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**CHATTANOOGA OFFICE COMPLEX RENOVATION,
DEMOLITION, AND/OR SALE
FINAL ENVIRONMENTAL ASSESSMENT
Hamilton County, Tennessee**

Prepared by:
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Symbols, Acronyms, and Abbreviations

AADT	Average Annual Daily Traffic
APE	Area of Potential Effects
BMPs	Best Management Practices
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO₂	Carbon Dioxide
COC	Chattanooga Office Complex
dB	Decibels
dBA	A-weighted Decibel
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act of 1973
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
GSA	General Services Administration
GHG	Greenhouse Gases
IPaC	Information for Planning and Consultation
L_{max}	Maximum Level of a Noise Source
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO₂	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
O₃	Ozone
Pb	Lead
PM	Particulate Matter
PPV	Peak Particle Velocity
RCRA	Resource Conservation and Recovery Act
SHPO	State Historic Preservation Officer
SO₂	Sulfur Dioxide
SSSP	Site-Specific Safety Plan
SWPPP	Stormwater Pollution Protection Plan
TDEC	Tennessee Department of Environment and Conservation
TVA	Tennessee Valley Authority
USFWS	United States Fish and Wildlife Service

CHAPTER 1 – PURPOSE AND NEED FOR ACTION

1.1 Background

The Tennessee Valley Authority's (TVA) Chattanooga Office Complex (COC; Project Area) opened in 1985 and contains more than 1,480,000 gross square feet of office space historically housing more than 3,500 TVA employees. The COC campus consists of four buildings that are physically and operationally connected (Signal Place, Lookout Place, Blue Ridge, and Missionary Ridge), and a fifth, initially separate building (Monteagle Place) which now has several operational connections to other COC buildings (Figure 1). The COC occupies approximately 9.3 acres in the Chattanooga Central Business Zone.

Since the onset of the COVID pandemic in Spring 2020, a substantial percentage of TVA COC office employees have worked in a hybrid work environment. This has led to the COC (which was already underutilized before the pandemic) being significantly underutilized. Like many private companies and other government organizations, TVA is proactively evaluating the future of office occupancy. The successful hybrid work undertaken by TVA employees has created a unique opportunity to re-evaluate how and where TVA employees work and enables TVA to consider whether the COC footprint can be put to a higher and better use for the Chattanooga region. TVA is committed to contributing to the vitality of downtown Chattanooga and TVA's future office space will be focused on delivering a modern, sustainable, and innovative workspace that meets the needs of its workforce.

As such, TVA is evaluating options for fully or partially renovating, demolishing, and/or the sale (including transfer) (collectively referred to herein as disposal) of the COC, which is too large for TVA's current or projected future needs. Consistent with its mission and strategic priorities, disposal of the COC and redevelopment could address TVA's changed business needs, improve efficiency, reduce expenses, improve employee recruitment and retention, and offer economic development opportunities. TVA anticipates that, following the potential disposal of the COC, any new office space would have a reduced footprint that meets TVA's current and future business needs.

The COC has also been recently selected by the General Services Administration (GSA) as one of the sites under consideration for a new Federal courthouse in downtown Chattanooga. Although a final selection has not yet been made, the proposed action includes alternatives that would meet GSA's construction schedule and needs, which currently call for a clean and construction-ready site in 2026 (Alternatives 2, 3 and 4). However, the alternatives being evaluated by TVA do not limit potential uses to the Federal courthouse. Based on current zoning requirements, reasonable possibilities of how the site could be developed following disposal include, but are not limited to, Federal courthouse, hotel, rental apartments, condominiums, ground floor retail, convention center expansion, and/or office space. TVA cannot reasonably foresee how the site would be developed following disposal of the COC; therefore, evaluation of potential future uses is beyond the scope of this evaluation.

In July 2023, TVA issued a request for proposal for replacement office space in the downtown Chattanooga area in the event TVA makes the decision to dispose of all or part of the COC. Any replacement office would be evaluated separately under applicable environmental laws and regulations and is outside the scope of this Environmental Assessment (EA).

1.2 Purpose and Need

The purpose of the proposed action is to align TVA's downtown Chattanooga office footprint with its current and projected future space needs. The current COC no longer meets TVA's needs and, therefore, the need for action is to better align TVA's strategic priorities to support and benefit the communities that TVA serves and eliminate underutilized space and related unnecessary expenses.

1.3 Decision to be Made

The primary decision to be made by TVA is to align TVA's downtown Chattanooga office footprint with its current and projected future space needs, with the following alternatives under consideration: (i) retaining ownership of and remaining at the COC (no action); (ii) demolishing the buildings and disposing of the land; (iii) disposing of the buildings and land as-is; or (iv) a combination of partial building retention and renovation.

This EA was prepared to inform TVA decision makers and the public about the environmental consequences of implementing the proposed action and alternatives. TVA will use this EA to support the decision-making process and to determine whether an Environmental Impact Statement (EIS) should be prepared or whether a Finding of No Significant Impact (FONSI) may be issued.

1.4 Related Environmental Reviews

TVA identified the following environmental reviews that are related to the proposed action. The contents of these related reviews help describe the Project Area and are incorporated by reference as appropriate.

Chattanooga Office Complex Environmental Assessment (TVA 1979). This EA describes the rationale for consolidating TVA office space from 21 buildings in Chattanooga into an energy-efficient and handicapped-accessible building.

Chattanooga Office Space Alternatives Environmental Assessment (TVA 2007). TVA's Chattanooga Office Space Alternatives EA describes the rationale for the lease or purchase of 600,000 square feet of office space in the Chattanooga, Tennessee, area.

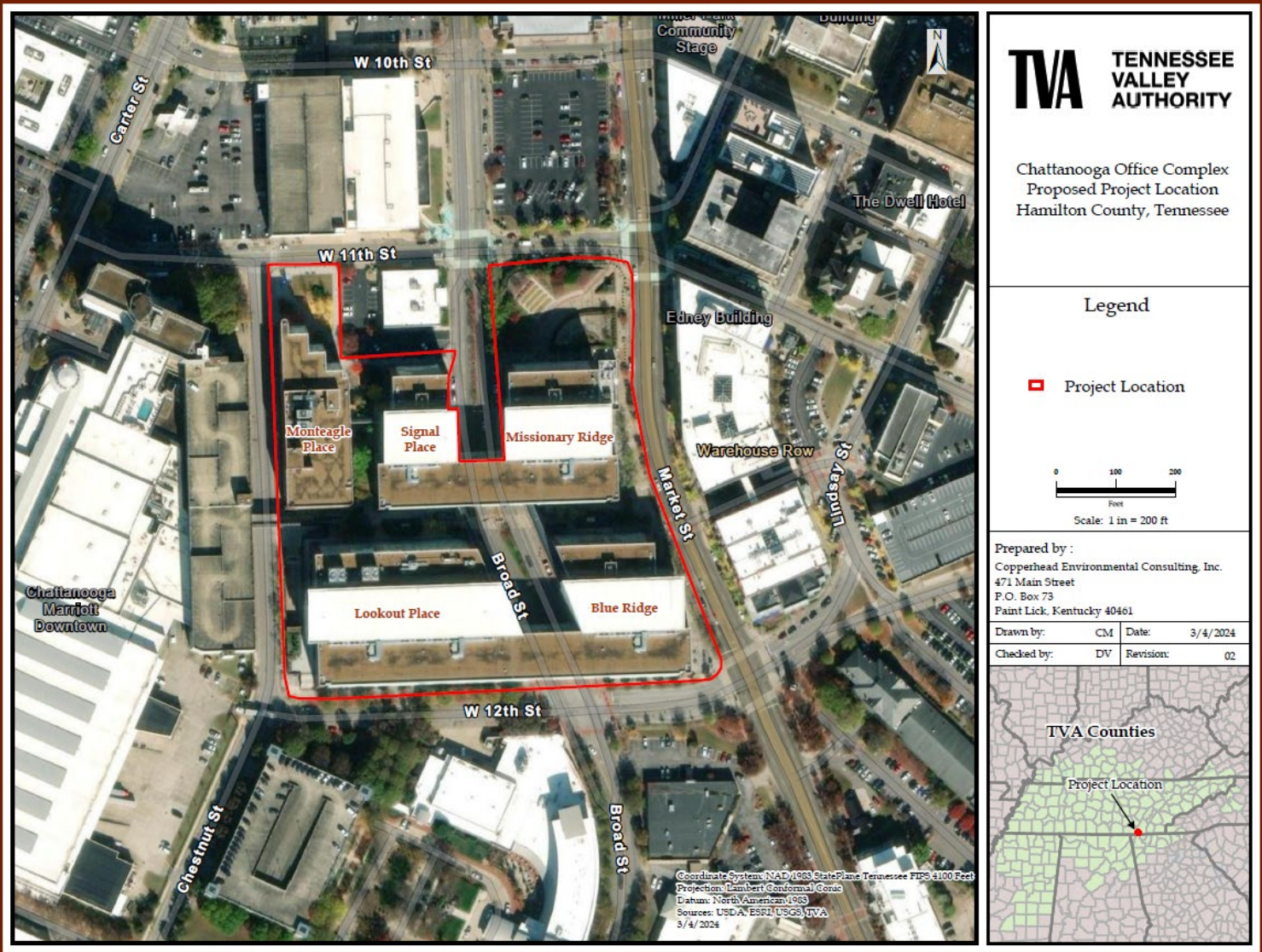


Figure 1. Project Location.

1.5 Scope of the Environmental Assessment

TVA is considering how to better align its downtown Chattanooga office footprint with its current and projected future space needs. This EA analyzes several options for the current COC that address the purpose and need for action, including retention, renovation, demolition, disposal, and/or a mix thereof.

TVA prepared this EA to comply with NEPA, regulations of the Council on Environmental Quality (CEQ) at 40 Code of Federal Regulations (CFR) part 1500 (as amended in 2020 and 2022), and TVA's regulations for implementing NEPA at 18 CFR part 1318. TVA reviewed the proposed action and identified the following issues to be evaluated in detail in the EA:

- Air Quality
- Land Use
- Geology and Soils
- Greenhouse Gases and Climate Change
- Noise and Vibration
- Transportation
- Visual Resources
- Utilities and Service Systems
- Socioeconomics and Environmental Justice
- Public Health and Safety
- Wildlife
- Threatened and Endangered Species
- Cultural Resources
- Managed and Natural Areas
- Recreational Resources
- Solid and Hazardous Waste
- Surface Water Quality

The following resources were considered but ultimately dismissed from further analysis in the EA:

- Aquatic Ecology: The COC is in an urban setting and no aquatic features are mapped within or near the COC. The alternatives are not expected to alter hydrology, fluvial geomorphology, or aquatic biology and therefore impacts on aquatic ecology require no further evaluation. Impacts on surface water quality from stormwater runoff are discussed in Section 3.17.
- Botany: No natural vegetation occurs within or near the COC. There is no potential for rare plant species or their habitat and therefore impacts on botany require no further evaluation.

- **Floodplains:** The proposed alternatives would not directly or indirectly impact floodplains and their natural and beneficial values. TVA Flood Risk also reviewed the COC footprint in depth and determined that all alternatives would be consistent with Executive Order (EO) 13690, the Federal Flood Risk Management Standard. Therefore, impacts on floodplains require no further evaluation.
- **Groundwater:** Each building in the COC has a stormwater pump and a sewage pump, neither of which are connected to groundwater. The geothermal heat exchanger described in the 1979 EA (TVA 1979) was never constructed, so the COC is not hydrologically connected to groundwater. In addition, demolition and renovation would not require any additional subsurface excavation or disturbance beyond what was done during construction in the 1980s. Therefore, impacts on groundwater require no further evaluation.
- **Surface Water Features:** The COC is located within the Lower Tennessee River (Nickajack Reservoir) watershed (8-digit Hydrologic Unit Code: 06020001). A 2023 desktop review indicated no aquatic features nor National Wetland Inventory features mapped within or near the COC. Therefore, impacts on surface water features require no further evaluation.
- **Wetlands:** There are no National Wetland Inventory features mapped within or near the COC and there is no potential for hydric soil, wetland hydrology, or hydrophytic vegetation in combination in the project area. Therefore, impacts on wetlands require no further evaluation.

1.6 Public and Agency Involvement

The draft EA was made available for a 30-day public review period, starting on March 12, 2024. The availability of the draft EA was announced in a TVA media release and a notification and request for comments in the Chattanooga Times Free Press. TVA shared the public meeting and EA notifications with the Patten Towers property manager (along with a request to distribute the notifications to Patten Towers residents). The draft EA was posted on TVA's website. TVA also hosted an in-person open house from 5-7 p.m. on March 26, 2024, at Miller Plaza, 850 Market St, Chattanooga. Appendix C contains the comments received on the draft EA and TVA's responses to the comments. This EA has been revised, where appropriate, in response to the comments received.

To address potential adverse effects to cultural resources, TVA consulted with the Tennessee Historical Commission and 13 federally recognized tribes in compliance with Section 106 of the National Historic Preservation Act. Additional detail is provided in Section 3.13.

Several activities associated with the action alternatives, including building demolition, were addressed in TVA's programmatic consultation with the United States Fish and Wildlife Service (USFWS) on routine actions and federally listed bats in accordance with the Endangered Species Act (ESA) Section 7(a)(2), which was completed in April 2018 and updated in May 2023. For those activities with potential to affect bats, TVA committed to implementing specific conservation measures. These activities and associated conservation measures are identified in the TVA Bat Strategy Project Screening Form (Appendix B).

1.7 Necessary Permits or Licenses

The following permits or licenses would be obtained prior to demolition and/or renovation activities:

1.7.1 City of Chattanooga Building Permit

The City of Chattanooga requires a separate building permit for each individual building or structure which is obtained from the Land Development Office. A building permit is required for any new, alteration, addition, or repair to any structure.

1.7.2 Demolition Permit

A demolition permit is required prior to demolition or renovation activities. TVA, the subsequent owner, or its designee would be required to submit a notice of demolition to the Chattanooga-Hamilton County Air Pollution Control Bureau. This form would need to be submitted at least 10 business days prior to beginning work and would need to be approved by the coordinator. If any asbestos-containing material or facility components that contain asbestos need to be removed, an additional permit may be required. Prior to demolition, additional coordination with Hamilton County may be needed to address potential air quality concerns.

1.7.3 City of Chattanooga Department of Public Works

Because the property is connected to a sewer line, TVA, the subsequent owner, or its designee would need to contact the City of Chattanooga Department of Public Works for a sewer line cap inspection should the line need to be capped.

1.7.4 City of Chattanooga Land Disturbing Permit

The City of Chattanooga requires a land disturbing activity permit for all land disturbing activities and is issued by the City of Chattanooga Land Development Office. For this permit, any project that consists of total land disturbance equal to or greater than one acre requires erosion and sediment controls to be in place such that land disturbing activities manage erosion or sediment into the streets, storm drain systems, and streams. A stormwater management plan needs to be in place such that permanent stormwater runoff meets water quality performance standards specified in the City of Chattanooga Rainwater Management Guide.

1.7.5 TDEC National Pollutant Discharge Elimination System General Permit

The Tennessee Department of Environment and Conservation (TDEC) requires a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Construction Activities for sites involving clearing, grading, or excavation that result in an area of disturbance of one or more acres.

CHAPTER 2 - ALTERNATIVES

This chapter describes the alternatives that TVA has considered for the COC Disposal Project. Some of the alternatives considered are not further analyzed in this EA because they do not meet the purpose and need of the project.

2.1 Description of Alternatives

During internal scoping, a total of seven alternatives were initially identified. Three alternatives are evaluated in detail in this EA along with the No Action Alternative. Each alternative, including those considered but dismissed from further analysis, is described below.

2.1.1 Alternative 1 – The No Action Alternative

This alternative would involve TVA retaining ownership of and remaining at the COC. TVA would continue to maintain the facilities and utilize the 1.48 million square feet of space. This alternative does not meet the purpose and need of the proposed action but represents current conditions against which the proposed action alternatives will be evaluated.

2.1.2 Alternative 2 – Demolish Buildings and Dispose of Land

This alternative would involve TVA demolishing the COC, either in stages or all at once, and disposing of the COC land¹. The method of demolition would be mechanical demolition with the exact means and methods to be determined by the demolition contractor. Demolition of the structures would require the strategic closure of one or more of the adjacent roadways (Chestnut Street, Market Street, Broad Street, and West 12th Street). The buildings would be demolished to the basement elevation, estimated to be between 20 to 25 feet below street elevation. This may include removal and disposal of all existing structures, including basements, sub-basements, and foundations.

The demolition process is anticipated to last approximately 10 months (and require approximately 96 workers) total for all buildings. During the demolition phase, there would be approximately 19,500 truck trips to deliver demolition materials to a permitted waste management facility/landfill designated to receive demolition and construction waste. If demolition is done in stages, the timeline would not be consecutive, but the impacts would be substantially similar. Once the demolition is complete, TVA would dispose of the vacant land in accordance with TVA's disposal authorities, which could include a public auction or transfer to the GSA.

2.1.3 Alternative 3 – Dispose of Buildings and Land

This alternative would involve TVA disposing of the COC land and buildings “as-is, where-is” by any means permissible within applicable disposal authorities available to TVA, which could include, but are not limited to, public auction or transfer to the GSA. Once disposed, it is possible that the new owner could demolish and construct new buildings, renovate the existing buildings, or use the existing buildings as-is.

2.1.4 Alternative 4 – Partial Retention and Renovation

To support modern employee needs, this alternative would involve a mix of retention, renovation and modernization, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof).

¹ Throughout this EA, the term “land” includes all applicable land rights.

There are four options considered under this alternative, which are described below. Depending on the option selected, demolition and renovation would take a total of 10 to 12 months and require approximately 128 to 174 workers. Demolitions and renovation may be done in stages, in which case the timeline may not be consecutive, but the impacts would be substantially similar. The number of truck trips would also vary but would be lower than that needed for full demolition under Alternative 2. Because each option considers a mix of retention and disposal, TVA would need to separate and reconnect utilities where those systems are interconnected across buildings. Table 2-1 displays a summary of each option in Alternative 4.

Table 2-1. Summary of Options in Alternative 4.

Building	Alternative 4a	Alternative 4b	Alternative 4c	Alternative 4d
Signal Place	Dispose	Renovate and modernize	Renovate and modernize	Dispose (may include demolition)
Lookout Place	Dispose	Renovate and modernize	Dispose (may include demolition)	Renovate and modernize
Blue Ridge	Dispose	Dispose (may include demolition)	Dispose (may include demolition)	Dispose (may include demolition)
Missionary Ridge	Dispose	Dispose (may include demolition)	Dispose (may include demolition)	Dispose (may include demolition)
Monteagle Place	Renovate and modernize	Renovate and modernize	Renovate and modernize	Dispose (may include demolition)

2.1.4.1 Alternative 4(a)

TVA would dispose of Signal Place, Lookout Place, Blue Ridge, and Missionary Ridge through the means described in Alternative 3 and renovate and modernize Monteagle Place (approximately 150,000 gross square feet) for the purpose of consolidating and housing operational infrastructure and functions that are either already located in Monteagle Place or dispersed throughout the COC campus. See Figure 2 for an overview of Alternative 4a.

2.1.4.2 Alternative 4(b)

TVA would renovate and modernize Lookout Place, Monteagle Place, and Signal Place (approximately 863,000 gross square feet). Renovation would include construction of the necessary underlying infrastructure. If this option were exercised, TVA would dispose of the remaining buildings (Blue Ridge and Missionary Ridge) through the means described in Alternative 2 and/or 3. See Figure 3 for an overview of Alternative 4b.

2.1.4.3 Alternative 4(c)

TVA would renovate and modernize Monteagle Place and Signal Place (approximately 355,000 gross square feet). Renovation would include construction of the necessary underlying infrastructure. If this option were exercised, TVA would dispose of the remaining buildings (Blue Ridge, Lookout Place, and Missionary Ridge) through the means described in Alternative 2 and/or 3. See Figure 4 for an overview of Alternative 4c.

2.1.4.4 Alternative 4(d)

TVA would renovate and modernize Lookout Place (approximately 508,000 gross square feet). Renovation would include construction of the necessary underlying infrastructure. If this option were exercised, TVA would dispose of the remaining buildings (Blue Ridge, Missionary Ridge, Monteagle Place, and Signal Place) through the means described in Alternative 2 and/or 3. See Figure 5 for an overview of Alternative 4d.

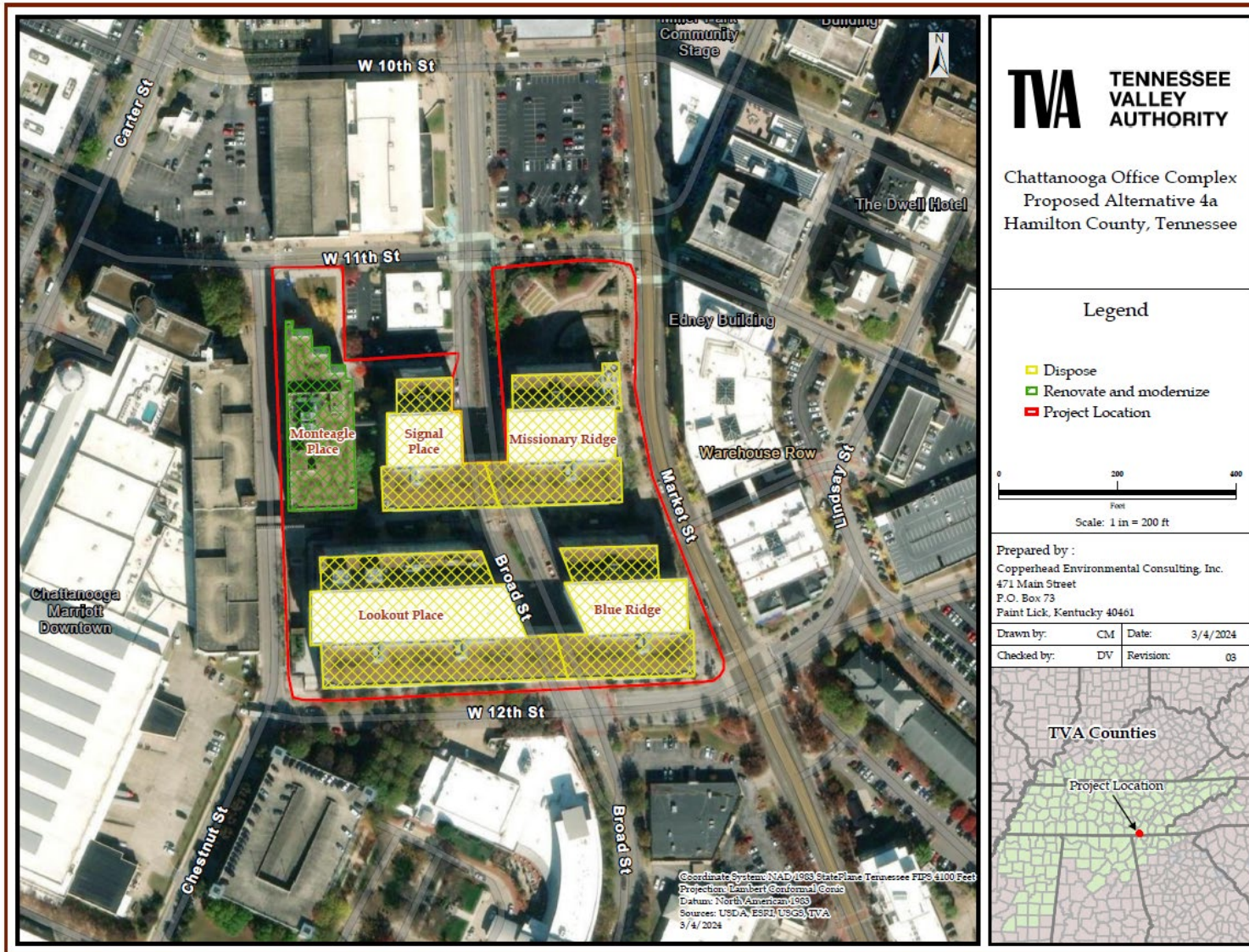


Figure 2. Alternative 4a.

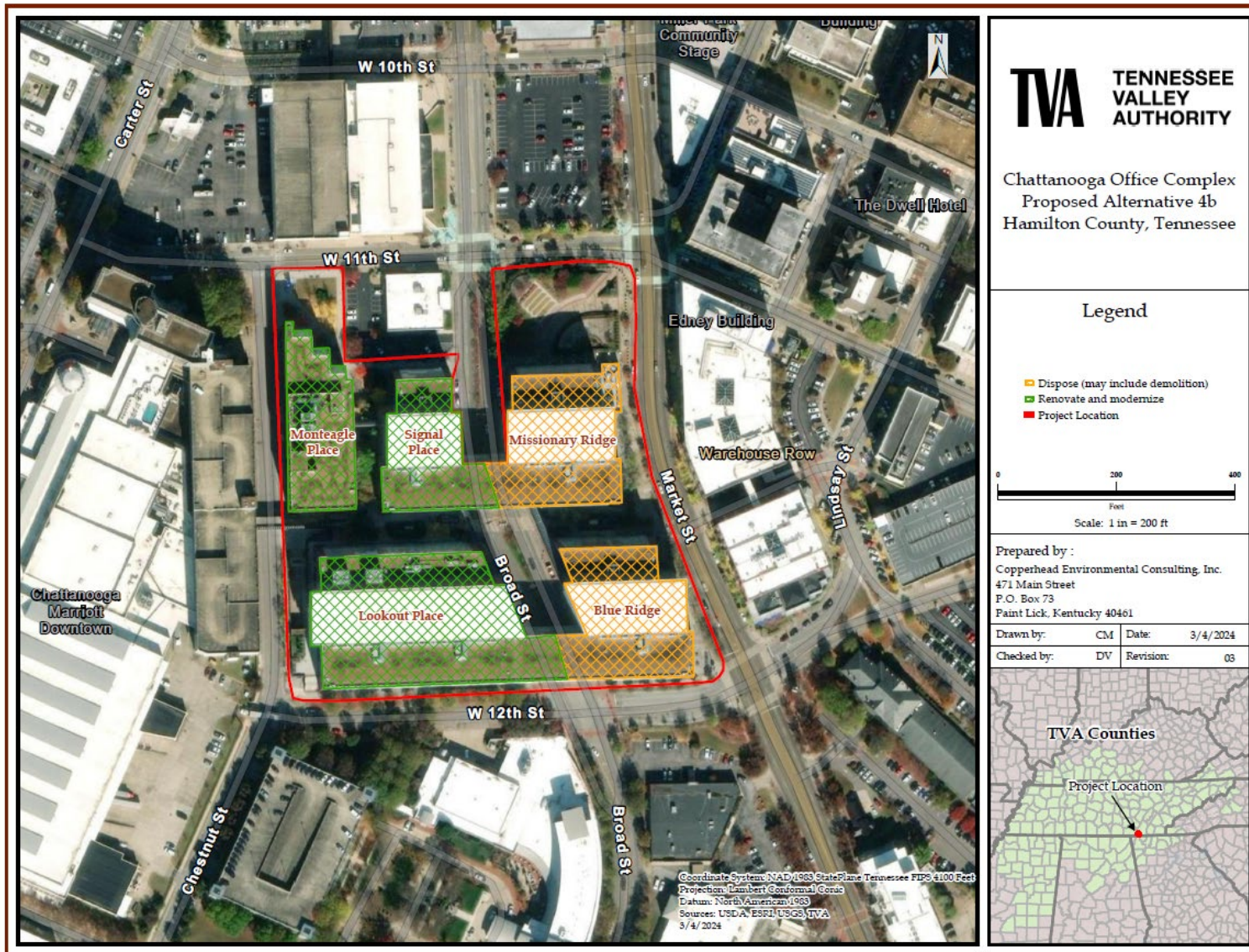


Figure 3. Alternative 4b.

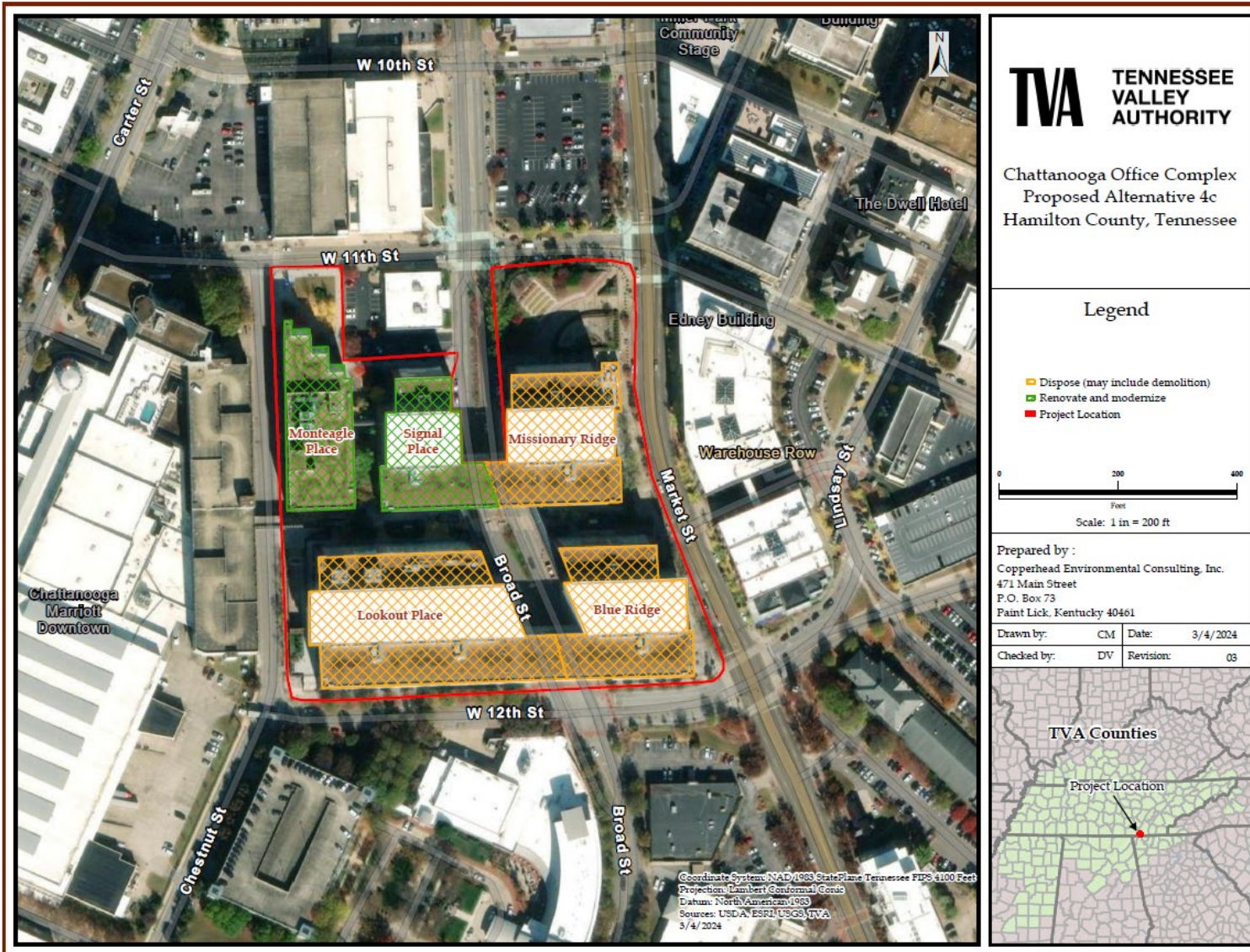


Figure 4. Alternative 4c.

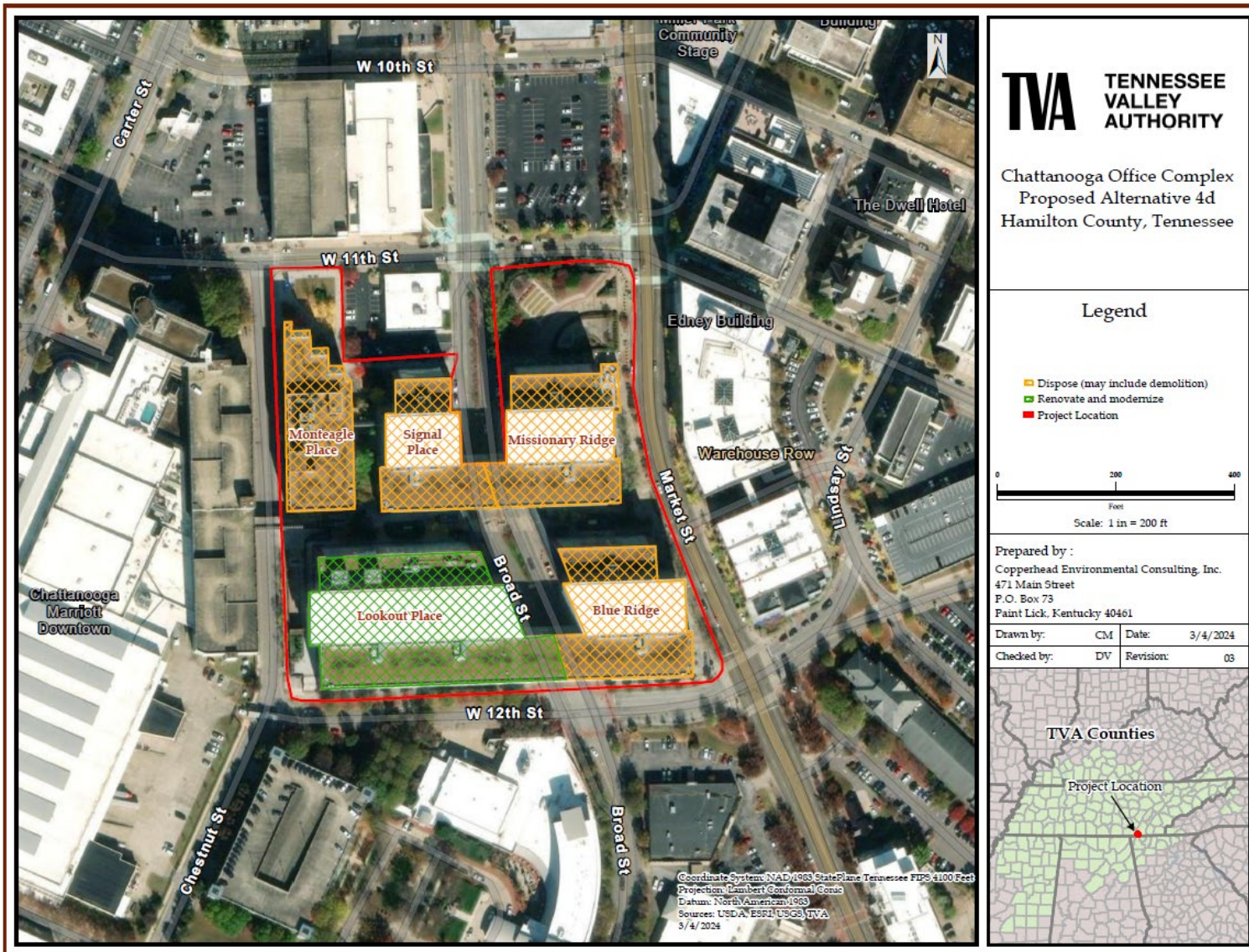


Figure 5. Alternative 4d.

2.1.5 Alternatives Considered but Eliminated from Further Discussion

Three additional alternatives were considered but eliminated from detailed consideration:

- Alternative 5 would involve TVA moving out of the COC campus, demolishing the buildings as described in Alternative 2 and then constructing a new building somewhere on the site to meet its future needs.
- Under Alternative 6, TVA would dispose of the COC as described in Alternative 3 and lease back a portion of the existing complex after it has been fully renovated.
- Under Alternative 7, TVA would retain and renovate Missionary Ridge and Blue Ridge (617,000 gross square feet). The remaining buildings (Lookout Place, Monteagle Place, and Signal Place) would be disposed of through the means described in Alternatives 2 and/or 3.

These three alternatives were dismissed because they would leave TVA employees without access to usable collaboration space for a significant time during construction periods. Additionally, it was determined that Alternatives 6 and 7 were technically unfeasible due to severability issues with building utilities and systems. Thus, these alternatives were not retained for analysis.

2.2 Comparison of Alternatives

Impacts evaluated may be beneficial or adverse and may apply to the full range of natural, aesthetic, historic, cultural, and socioeconomic resources within and around the Project Area. Because TVA cannot reasonably predict how the COC or land would be used after disposal, impacts associated with specific future land uses are not evaluated. Impact severity is dependent upon their relative magnitude, intensity, and resource sensitivity. In this document, four descriptors are used to characterize the level of impacts in a manner that is consistent with TVA's current practice. In order of degree of impact, the descriptors are as follows:

- No Impact (or "absent") – Resource not present or, if present, not affected by Project alternatives under consideration.
- Minor – Environmental effects are not detectable or are so minor that they would not noticeably alter any important attribute of the resource.
- Moderate – Environmental effects are sufficient to alter noticeably, but not to destabilize, important attributes of the resource.
- Large – Environmental effects are clearly noticeable and are sufficient to destabilize important attributes of the resource.

A comparison of the environmental consequences associated with each alternative is presented in Table 2-2.

Table 2-2. Summary and Comparison of Alternatives by Resource Areas

Resource Area	No Action Alternative	Alternative 2	Alternative 3	Alternative 4
Air Quality	No Impacts	Minor adverse impacts due to a temporary increase in airborne soil and dust and temporary increase in vehicle emissions associated with demolition activities	No impacts	Minor adverse impacts due to a temporary increase in airborne soil and dust and temporary increase in vehicle emissions associated with partial demolition or remodeling activities
Land Use	No Impacts	No impacts	No impacts	No Impacts
Geology and Soils	No Impacts	Minor adverse impacts with implementation of Soil Management Plan	No Impacts	Minor adverse impacts with implementation of Soil Management Plan
Greenhouse Gases and Climate Change	No Impacts on climate change; possible long-term increase in energy consumption for heating and cooling the COC	Minor adverse impacts due to increase in emissions associated with demolition	No Impacts	No impacts from disposal as-is; short-term minor adverse impacts during renovation
Noise and Vibration	No Impacts	Temporary minor to moderate adverse noise impacts during demolition associated with equipment; temporary minor adverse impacts from vibration	No Impacts	Temporary minor adverse noise and vibration impacts during partial demolition and remodeling which will be confined to the interior of buildings and likely use less equipment than full demolition under Alternative 2

Chattanooga Office Complex Renovation, Demolition, and/or Sale

Resource Area	No Action Alternative	Alternative 2	Alternative 3	Alternative 4
Transportation	No Impacts	Moderate adverse impacts during demolition due to increase in truck traffic and altered traffic patterns	No impacts because TVA employees would commute to a new office site, representing a continuation of current commuting traffic trends	Moderate adverse impacts during demolition due to increase in truck traffic and altered traffic patterns; minor adverse impacts from renovation
Visual Resources	No Impacts	Minor short-term adverse impacts during demolition	No impacts	No impacts from disposal; minor short-term adverse impacts during demolition
Utilities and Service Systems	No Impacts	No Impacts	No Impacts	Minor temporary impacts during separation and reconnection of utilities and services during partial demolition, renovation, and/or disposal
Socioeconomics and Environmental Justice	No impacts	Minor beneficial impacts from hiring construction workers; no disproportionate impacts on disadvantaged communities; benefits if COC site is more fully utilized	No disproportionate impacts on disadvantaged communities; benefits if COC site is more fully utilized	Minor beneficial impacts from hiring construction workers; no disproportionate impacts on disadvantaged communities; benefits if COC site is more fully utilized
Public Health and Safety	No Impacts	Minor, short-term adverse impacts associated with demolition; coordination with appropriate state and federal agencies would minimize impacts	No impacts	Minor, short-term adverse impacts associated with demolition and/or remodeling; coordination with appropriate state and federal agencies would minimize impacts
Wildlife	No Impacts	Minor, short-term direct adverse impacts during demolition	No Impacts	Minor, short-term direct adverse effects during demolition and remodeling

Resource Area	No Action Alternative	Alternative 2	Alternative 3	Alternative 4
Threatened and Endangered Species	No Impacts	May affect but would not likely adversely affect gray bat, Indiana bat, northern long-eared bat. Would not jeopardize the continued existence of the tricolored bat; no impacts on other species	No Impacts	May affect but would not likely adversely affect gray bat, Indiana bat, northern long-eared bat. Would not jeopardize the continued existence of the tricolored bat; no impacts on other species
Cultural Resources	No Effects	No Effects	No Effects	No Effects
Managed and Natural Areas	No Impacts	Minor, short-term adverse impacts associated with demolition activities and resulting dust, debris, and traffic	No Impacts	Minor, short-term adverse impacts associated with demolition and/or remodeling and resulting dust, debris, and traffic
Recreational Resources	No Impacts	Minor to moderate short-term adverse impacts associated with demolition activities and resulting dust, debris, and traffic	No Impacts	Minor to moderate short-term adverse impacts associated with demolition activities and resulting dust, debris, and traffic
Solid and Hazardous Waste	No Impacts	Minor, short-term adverse impacts associated with generation of construction and demolition debris	No Impacts	Minor, short-term adverse impacts associated with generation of construction and demolition debris
Surface Water Quality	No Impacts	Minor, temporary adverse impacts with implementation of BMPs	No Impacts	Minor, temporary adverse impacts with implementation of BMPs

2.3 Summary of TVA Commitments and Proposed Mitigation Measures

TVA would acquire all applicable permits prior to the start of Project construction (see Section 1.6). Therefore, TVA would implement all permit-related mitigation measures and BMPs during Project construction to minimize impacts to the environment. TVA would also implement the following best management practices and mitigation measures to ensure that adverse impacts to environmental resources listed above are avoided, minimized, or mitigated.

2.3.1 Best Management Practices and Routine Measures

2.3.1.1 Noise

- Demolition, construction, and/or external renovation would take place in accordance with the City of Chattanooga's noise ordinance, unless otherwise authorized by the City.

2.3.1.2 Solid and Hazardous Waste

- TDEC Underground Storage Tank System Closure Assessment Guidelines would be followed for removal of underground storage tanks located on site.
- The contractor would obtain TVA permits for excavation and drilling/chipping of concrete, as applicable.

2.3.1.3 Public Health and Safety

- Demolition and renovation would comply with Occupational Safety and Health administration (OSHA) Lead in Construction Standard 29 CFR 1926.62.
- The contractor would comply with TVA's Safe Work Requirements Manual and implement a project-specific safety plan for any demolition, renovation, and/or construction activities.
- The contractor would dispose of recyclable and non-recyclable waste generated during demolition or renovation at permitted facilities.
- The contractor would comply with TVA's Safety Manual for Lead, Silica, Respiratory Protection, Hazard Communication and Rigging.

2.3.1.4 Soils

- The contractor would implement a Fugitive Dust Control Plan that addresses mitigation of construction, demolition, loading and unloading, and mechanical/manual breaking/sawing of debris, as applicable.
- Wet suppression would be used during demolition, renovation, and/or construction to control dust and other emissions.
- Prior to demolition, renovation, and/or construction activities, the contractor would obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of stormwater from site activities and prepare a Storm Water Pollution Prevention Plan (SWPPP).
- The contractor would implement a Soil Management Plan to address soil displacement and disposal as applicable.

2.3.1.5 Utilities

- During demolition, interruptions to utility lines (e.g., electrical, sewer) would be avoided or minimized to the extent possible to avoid unplanned utility outages. Should utility severance require any temporary outages or interruptions, TVA would coordinate with the applicable utility provider(s) to minimize planned disruptions.

2.3.2 Mitigation Measures

2.3.2.1 *Solid and Hazardous Waste*

- A regulated materials assessment would be performed prior to renovation or demolition to determine the presence of asbestos-containing materials and other materials of potential concern. If found, they would be disposed of in accordance with federal, state, and local regulations.

2.3.2.2 *Wildlife and Threatened and Endangered Species*

- TVA would survey any unmaintained buildings (i.e., buildings not maintained or used) at least one month prior to demolition operations for wildlife that may be present.
- TVA would implement conservation measures identified in TVA's programmatic consultation with the USFWS on routine actions and federally listed bats in accordance with the Endangered Species Act (ESA) Section 7(a)(2), originally signed in April 2018 and updated in May 2023 (USFWS 2018, 2023a). Relevant conservation measures that would be implemented as part of the approved project are listed in the bat strategy form. The bat strategy form is included as Appendix B.

2.3.2.3 *Transportation*

- The contractor would develop and implement a traffic management plan in coordination with the City of Chattanooga.

CHAPTER 3 – AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the existing environmental, social, and economic conditions of the Project Area and the surrounding areas as well as the anticipated potential effects of implementing the No Action Alternative and the Action Alternatives (i.e., Alternatives 2, 3, and 4) for each resource. The No Action Alternative is analyzed in the EA to establish a baseline for analyzing the environmental impacts of the Action Alternatives in accordance with NEPA regulations.

Unless otherwise noted, the geographic area of analysis for each resource includes the 9.3-acre COC.

Short-term effects are those that would occur during demolition or renovation. Long-term effects are those associated with post-demolition and post-renovation activities. Because TVA cannot reasonably predict how the COC or land would be used after disposal, impacts associated with specific future land uses are not evaluated.

3.1 Air Quality

The U.S. Environmental Protection Agency (EPA) regulates pollutants and airborne emissions in the United States. The Clean Air Act of 1970 (CAA) (42 U.S.C. § 7401 et seq.) authorizes the EPA to establish National Ambient Air Quality Standards (NAAQS) for six criteria pollutants to protect the environment and the public. The criterial pollutants are carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM_{2.5} and PM₁₀), and sulfur dioxide (SO₂). If a geographic area (e.g., city, county) exceeds the NAAQS, it is considered a non-attainment area for the respective pollutant(s).

As required by the EPA, each state must develop a State Implementation Plan which identifies the NAAQS attainment status for each pollutant. In Tennessee, Chattanooga is in attainment for all criteria pollutants (USEPA 2023a).

3.1.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. Because there would be no demolition or construction activities and no changes in emissions from COC operation or employee commuting, implementation of the No Action Alternative would not result in new direct or indirect impacts on air quality. Continued operation of the COC would not contribute to the non-attainment of any NAAQS.

3.1.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition would result in a temporary increase in airborne soil and dust. Adverse effects associated with demolition debris would be minor because TVA would require best management practices (BMPs) including implementing a Fugitive Dust Control Plan to control dust and other emissions. Emissions from vehicles and equipment associated with demolition would have a temporary, minor effect on air quality, but the anticipated number of project-related vehicles (an average of 260 daily during demolition) is not anticipated to contribute to a decrease in air quality or non-attainment of any NAAQS.

3.1.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. TVA employees would commute to a new office site, representing a continuation of current emissions trends from their vehicles. Because no demolition or renovation would occur, there would be no change in air quality over the short term.

3.1.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts from demolition would be similar to those under Alternative 2, except that only a portion of the COC would be demolished, resulting in fewer adverse impacts on air quality. As under Alternative 2, these impacts would be minimized by implementing BMPs and are not anticipated to contribute to non-attainment of NAAQS. Impacts from remodeling buildings would be less than those from demolition because there would be less debris. Over the long term, the renovated, modern facility is expected to use less energy and produce fewer emissions than in its current condition. Any “as-is” disposal of existing buildings would not result in an impact on air quality.

3.2 Land Use

The COC occupies approximately 9.3 acres and has been occupied by TVA since 1985. It is bounded by Market Street to the East, West 12th Street to the south, Chestnut Street to the west, and 11th Street to the north. The COC is bisected by Broad Street which divides Monteagle Place, Signal Place, and Lookout Place from Missionary Ridge and Blue Ridge. It is located within the downtown commercial use (D-CX-12) zone.

The sites surrounding the COC are highly developed and zoned as U-IX (Urban industrial use), U-SH (Urban Shopfront Mixed use), and D-CIV (Downtown core Civic).

3.2.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no change in land use and therefore no impacts on land use.

3.2.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. TVA’s contractor would obtain all required permits for demolition, ensuring consistency with land use and associated regulations. Disposal would be consistent with applicable land use laws and regulations. TVA cannot reasonably predict how the COC land would be used after disposal, but any future uses would need to be compliant with applicable City zoning and land use regulations.

3.2.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. As under Alternative 2, any future uses would need to be compliant with applicable City zoning and land use regulations.

3.2.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). All actions would be consistent with applicable land use laws or regulations. TVA cannot reasonably predict how the COC land would be

used after disposal, but any future uses would need to be compliant with applicable City zoning and land use regulations.

3.3 Geology and Soils

The COC is in the Ridge and Valley Level III Ecoregion and the Southern Limestone/Dolomite Valleys and Low Rolling Hills Level IV Ecoregion (Griffith et al. 2023). The geology and soils of this low-lying area are mostly made up of limestone and cherty dolomite rock formations with soils predominantly being Paleudults (Fullerton, Dewey, Decatur, Bodine, and Waynesboro series) (Griffith et al. 1997). These soils are characterized by thick subsoil layers and heavy leaching and are mostly utilized for agricultural cropland and forests (Morris 2017).

The soils within the Project Area are mapped as Urban soils (USDA NRCS 2023, USDA Soil Conservation Service 1982). Urban soils are at least 85 percent covered by urban buildings, streets, or other man-made structures. They are characterized by either unidentifiable soils or by soils that have been significantly disturbed by the installation of utilities and the excavation and construction of urban structures. They can also consist of other soils or man-made materials imported from other locations (USDA NRCS 2023).

During construction of the COC, on-site soils were disturbed and the land was excavated to a depth of approximately 20 to 25 feet below ground level for the building basements and foundations.

3.3.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no change in geology or soil conditions and therefore no impacts on geological or soil resources.

3.3.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. The buildings would be demolished down to the basement elevation, approximately 20 to 25 feet below ground level. This may include removal and disposal of all existing structures, including basements, sub-basements, and foundations. As a result, there would be no additional disturbance beyond that associated with the original COC construction in the 1980s. Potential adverse impacts associated with soil displacement and disposal would be minimized by implementing a Soil Management Plan. For these reasons, there would be minor impacts on geology and soils.

3.3.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. There would be no change to the soils or geology of the COC and therefore no impacts.

3.3.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Retention and disposal would not result in adverse impacts on soils or geology because there would be no change in their condition. Renovation and demolition would result in minor adverse impacts as described under Alternative 2.

3.4 Greenhouse Gases and Climate Change

Climate change “refers to changes in global or regional climate patterns attributed largely to human-caused increased levels of atmospheric greenhouse gases” (USEPA 2023b).

Human-produced greenhouse gases are the most significant driver of climate change and carbon dioxide (CO₂) is responsible for three quarters of global greenhouse gas emissions (USEPA 2023c).

CO₂-producing activities associated with the proposed COC project vary by alternative, but include heating and cooling the COC buildings, vehicle travel to and from the COC, and renovation and demolition fossil fuel powered equipment such as bulldozers, cranes, loaders, haulers, trucks, and generators.

In January 2023, the CEQ issued interim guidance to assist federal agencies in analyzing greenhouse gases (GHG) and climate change effects under NEPA. The guidance recommends that agencies quantify GHG emissions when possible, and if data are not available, to include a qualitative analysis in the NEPA document. The guidance also instructs agencies to consider: (1) the potential effects of a proposed action on climate change, including by assessing both GHG emissions and reductions from the proposed action; and (2) the effects of climate change on a proposed action and its environmental impacts (CEQ 2023).

3.4.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would continue to be GHG emissions from operation of the COC, but there would be no demolition or construction activities and their associated GHG emissions. As such, the No Action Alternative would not contribute to climate change. Over the long term, the effects of climate change including warmer temperatures could result in a minor increase in energy consumption for heating and cooling the COC.

3.4.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition equipment and vehicles for workers commuting to and from the site would emit GHGs during that phase of the project. The amount of GHG emissions associated with the equipment and vehicles is anticipated to be minor compared to local and regional emissions. GHGs would also be minimized by adhering to practices including proper maintenance of demolition equipment. No impacts on or from climate change are anticipated from demolition and disposal.

3.4.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. Because no demolition or renovation would occur, there would be no change in GHGs and no impact on or from climate change.

3.4.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on, and from, climate change would be similar to those two alternatives except that renovating existing buildings would result in a short-term increase and long-term reduction in GHGs: equipment used during renovation would emit a minor amount of GHGs in comparison to local and regional emissions, and the

building(s) would be made more energy efficient, resulting in a long-term decrease in GHGs during operation.

3.5 Noise and Vibration

Noise is defined as unwanted or unwelcome sound judged to be unpleasant, loud, or disruptive. For the purposes of this document, this definition is focused on sound added to the natural acoustic environment of an area caused by human activities. The level of disturbance or unpleasantness can be variable and subjective, but the intensity or loudness of a sound is measured on a logarithmic scale in units called decibels (dB). Because of inherent subjectivity, we adjust dB using an “A-weighted decibel” (dBA), which weights high-pitched and low-pitched sounds to approximate the average person’s hearing level. A noise level change of 3 dBA or less is barely perceptible to average human hearing while a 5 dBA change is clearly noticeable, and a 10 dBA change is considered doubling or halving loudness.

The typical noise level for urban areas is approximately 70 dBA and can temporarily reach up to 120 dBA due to sirens and other loud vehicles (USEPA 1971). The COC and surrounding parcels are zoned as “Downtown Core/Urban” in an area comprised of storefronts, industrial, and civic buildings. The noise environment is characterized by road traffic, commercial activities, construction equipment, and other noises typical of an urban setting. The nearest sensitive receptors are the downtown branch of the Chattanooga Public Library (north of West 11th Street) and apartments on upper-level floors of Warehouse Row, which is a mixed-use development (east of Market Street). The USEPA recommends a 24-hour average noise exposure limit of 55dBA to protect against adverse effects on health and welfare in residential areas (US EPA 1974).

The City of Chattanooga municipal ordinance addresses noise (Chattanooga, TN Code of Ordinances- Article III 2016).

Construction activities from vehicle traffic and construction equipment create sounds referred to as construction noise (for the COC project, this also includes noise during demolition and renovation). The level of construction noise is never constant. Therefore, it is necessary to use a standardized descriptor to describe the varying construction noise levels. Here we use the maximum level of a noise source (L_{max}), which is defined as the highest root mean squared sound pressure level within a measuring period. The Federal Highway Administration has developed a table for L_{max} values for various pieces of construction equipment. For traffic-related noise, the Federal Highway Administration has set a threshold of 67 dBA as the sound level at which noise abatement should be considered. Equipment likely to be utilized for demolition and renovation are presented in Table 3-1.

Table 3-2. Average Noise Levels from Construction Equipment

Construction Equipment	Average Measured Lmax @ 50 feet (dBA, slow)
Auger Drill Rig	84
Backhoe	78
Concrete Mixer Truck	79
Concrete Pump Truck	81
Crane	81
Dozer	82
Drill Rig Truck	79
Dump Truck	76
Excavator	81
Flat Bed Truck	74
Front End Loader	79
Jackhammer	89
Pickup Truck	75
Vibratory Concrete Mixer	80

Source: Federal Highway Administration 2017

Vibration is defined as an oscillation stemming from the motion of a mechanical system. According to the Federal Transit Administration, people are more likely to perceive ground-borne vibration when they are indoors. Signs of vibration may include rattling of windows or household items. Outdoors, where the effects of a shaking building are not experienced, ground-borne vibration is almost never considered to be a problem (FTA 2018).

Vibration is measured in peak particle velocity (PPV), which is the maximum instantaneous positive or negative peak of the vibration signal. PPV is often used in monitoring construction vibration as it relates to stresses on buildings. Buildings extremely susceptible to vibration damage are at risk of such damage when the PPV exceeds 0.12 inches per second (FTA 2018). Table 3-2 displays vibration source levels for typical construction equipment likely to be used during demolition or renovation.

Table 3-3. Vibration Source Levels from Construction Equipment

Construction Equipment	Peak Particle Velocity (inches per second) at 25 Feet	Peak Particle Velocity (inches per second) at 50 Feet
Clam Shovel Drop	0.202	0.071
Hydromill (in soil)	0.008	0.003
Hydromill (in rock)	0.017	0.006
Hoe Ram	0.089	0.032
Large Bulldozer	0.089	0.032
Loaded Truck	0.076	0.027
Jackhammer	0.035	0.012
Small Bulldozer	0.003	0.001

Source: Adapted from FTA 2018.

3.5.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. As a result, there would be no changes in noise or vibration levels in the Project Area and no adverse impacts on sensitive receptors.

3.5.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition equipment would result in a temporary adverse effect on noise and vibration levels. As shown in Table 3-1, maximum noise levels could be up to 89 dBA at 50 feet. Demolition noise would attenuate to urban background levels (70 dBA) at approximately 445 feet or 0.08 miles. As such, the temporary increase in noise levels would be noticeable near the COC, including sensitive receptors such as residents of Warehouse Row and visitors at the Chattanooga Public Library. Demolition noise would be more noticeable to outdoor receptors than those indoors, as the USEPA identifies noise levels indoors as typically being 15dB less than levels outdoors due to attenuation from the building structure (USEPA 1974). Impacts would be minimized by adhering to the City of Chattanooga's noise ordinance. Depending on the schedule requirements, demolition activities may occur outside the standard hours set by the City of Chattanooga and TVA would obtain the necessary authorizations from the City. For these reasons, short-term adverse noise impacts would be moderate in intensity for outdoor sensitive receptors and minor for indoor sensitive receptors.

Vibration impacts would be temporary and minor in intensity, as the COC is approximately 50 feet from the nearest neighboring building and vibration levels at that distance would be less than the threshold for possible harm to buildings that are extremely susceptible to vibration damage.

3.5.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an "as-is, where-is" state. Because no demolition or renovation would occur, there would be no change in noise or vibration conditions and no impact on sensitive receptors.

3.5.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Because Alternative 4 includes only partial demolition, related impacts on noise and vibration would be less in intensity and duration than those under Alternative 2. Noise associated with remodeling activities would largely be contained to the interiors of buildings and would therefore be less noticeable to nearby noise receptors. Vibration impacts during renovation would likely be less than those during demolition, as work would generally require less intensive construction equipment.

3.6 Transportation

The COC is bounded by Market Street to the East, West 12th Street to the south, Chestnut Street to the west, and 11th Street to the north. The COC is bisected by Broad Street which divides Monteagle Place, Signal Place, and Lookout Place from Missionary Ridge and Blue Ridge. Primary routes servicing commuter traffic to the COC include Interstate 124 and Interstate 24, both of which can be accessed via Broad Street, Chestnut Street, Market Street, and W. Martin Luther King Jr. Boulevard. Table 3-3 displays the average annual daily traffic (AADT) of roads nearest the COC. Some roads have more than one traffic counter and, therefore, more than one AADT value.

Table 3-4. Annual Average Daily Traffic Near the COC

Road	Annual Average Daily Traffic ¹
11 th Street	1,359 to 1,783
Broad Street	6,039
Houston Street	2,282
10 th Street	1,369 to 2,019

Source: Tennessee Department of Transportation 2022

¹ Multiple values are presented where there is more than one traffic counter near the COC

3.6.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities and no changes in commuter traffic patterns. As a result, there would be no impacts on transportation.

3.6.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. TVA employees would commute to a new office site, representing a continuation of current commuting traffic trends. Demolition of the structures would require the strategic closure of one or more of the adjacent roadways: Chestnut Street, Market Street, Broad Street, and/or West 12th Street. This would temporarily alter traffic patterns in this part of downtown Chattanooga. Impacts from a closure would be greatest if Broad Street is temporarily closed because this road has the highest AADT. Demolition would introduce contractor commute traffic and truck traffic. The number of demolition contractor vehicles traveling to and from the COC each day could create congestion during certain times. Over the 10 months of demolition, there would be an estimated 19,500 truckloads to haul material on and off the site. This equates to an average of 75 truck trips each weekday. There would likely be more truck trips during certain times and fewer trips after the bulk of the demolition material has been removed and the site is prepared for disposal. During off-peak hours, these truck trips would have a minor impact on congestion and delays on nearby roads. During periods of peak demolition activity that coincide with rush hour, or if Broad Street or other roads are temporarily closed, impacts would be moderate. The contractor would implement a traffic management plan to minimize truck- and construction equipment-related disruptions on roads near the COC.

3.6.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. There would be no impacts related to road closures or detours. TVA employees would commute to a new office site, representing a continuation of current commuting traffic trends.

3.6.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). TVA anticipates that the number of TVA employees commuting to the COC would remain relatively unchanged. Accordingly, there would be no new impacts on transportation from TVA employee commutes. The nature and type of impacts from demolition would be similar to those described under Alternative 2, except that demolition would occur on only a portion of the COC and there would be fewer associated truck trips, congestion, and delays. Possible road closures (e.g., Broad Street) would likely occur over a shorter period of time but would still represent a moderate adverse impact due to disruptions in downtown traffic. Transportation impacts from disposal without demolition would be the same as those under Alternative 3. Renovation of some buildings

would temporarily introduce additional traffic to local roads, but the increase is anticipated to be minor because the number of workers and truckloads would likely be less than that needed for demolition.

3.7 Visual Resources

This assessment provides a review of the visual attributes of existing scenery, along with the anticipated impacts resulting from implementation of the alternatives. The classification criteria used in this analysis are adapted from a scenic management system developed by the US Forest Service and integrated with planning methods used by TVA. The classification process is also based on the methodology and descriptions adapted from Landscape Aesthetics, A Handbook for Scenery Management, Agriculture Handbook Number 701 (US Forest Service 1995).

Scenic resources and impacts within a landscape are evaluated based on several factors that include scenic attractiveness, integrity, and visibility. Scenic attractiveness is a measure of scenic quality based on human perceptions of intrinsic beauty as expressed in the forms, colors, textures, and visual composition of each landscape. Scenic integrity is a measure of scenic importance based on the degree of visual unity and wholeness of the natural landscape character. The varied combinations of natural features and human alterations both shape landscape character and help define their scenic importance. The subjective perceptions of a landscape's aesthetic quality and sense of place are dependent on where and how it is viewed. For this analysis, the affected environment is the Project Area, as well as the physical and natural features of the surrounding properties.

The Project Area has been converted to developed use and offers a moderate degree of scenic attractiveness and integrity. The COC is designed in the style of brutalist architecture, characterized by its utilitarian and functional design that features geometric shapes and places an emphasis on materials, specifically exposed concrete. The Hamilton County Justice Building and the Chattanooga Public Library are two other examples of brutalist architecture in Chattanooga. While the COC was not deemed eligible for listing on the National Register of Historic Places (NRHP) because it lacks architectural detail of note (New South Associates 2023), its architectural style contributes to the overall aesthetic of the city center district.

The COC is in the city center district which features modern and historic mixed-use and commercial buildings, restaurants and bars, hotels, the Chattanooga Convention Center, the downtown branch of the Chattanooga Public Library, and Warehouse Row (a mixed-use development on Market Street). Most of the surrounding properties are developed with a few interspersed, small parks and green spaces in front of buildings, such as the amphitheater in front of the COC. These surrounding properties exhibit low to moderate scenic attractiveness and integrity. These values are generally higher where the property has a unique architectural style or has been recently renovated (e.g., Warehouse Row), and lower where those aspects are absent (e.g., parking garages).

Typical of a mixed-use urban setting, there are no sensitive visual resources near the Project Area.

3.7.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and, as a result, there would be no changes to the scenic attractiveness, integrity, or visibility of the Project Area.

3.7.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition would alter the scenic attractiveness, integrity, and visibility of the Project Area, resulting in a minor adverse impact on visual resources.

3.7.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. Because the COC would not be altered prior to disposal, there would be no changes to the scenic attractiveness, integrity, or visibility of the Project Area.

3.7.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on the scenic attractiveness, integrity, and visibility of the Project Area would vary depending on which building exteriors are altered through renovation or demolition. Impacts would be minor under Alternatives 4b through 4d because only a portion of the COC buildings would undergo exterior changes or demolition. There would be no impact on visual resources under Alternative 4a because all buildings would be retained or disposed of as-is.

3.8 Utilities and Service Systems

The COC is served by a variety of utility providers and service systems, including the following:

- Electric and Phone – Electric Power Board of Chattanooga
- Water – Tennessee-American Water Company
- Sewer – City of Chattanooga, Waste Resources Division
- Gas – Chattanooga Gas
- Trash and Recycling – City of Chattanooga
- Cable and Internet – AT&T, EPB Lumen

3.8.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no changes to utilities and service systems and therefore no impacts.

3.8.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition would not affect future utility service availability and is not anticipated to adversely impact service systems because all demolition waste would be disposed of at permitted commercial facilities with adequate capacity to accommodate the waste. During demolition, interruptions to utility lines (e.g., electrical, sewer) would be avoided or minimized to the extent possible to avoid unplanned utility outages. Should utility severance require any temporary outages or interruptions, TVA would coordinate with the applicable utility provider(s) to minimize planned disruptions. In addition, waste would be disposed of in accordance with applicable laws and regulations (see Section 3.16, Solid and Hazardous Waste).

3.8.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. Because the COC would not be altered prior to disposal, there would be no changes to utilities and service systems and therefore no impacts.

3.8.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Demolition and renovation impacts would be similar to those under Alternative 2, except that they would generate less waste because only a portion of the buildings would be demolished or renovated. Continued use of some buildings by TVA would not overburden utility providers because there would be less square footage for heating, cooling, and other utilities and service systems.

Because the options under Alternative 4 involve retention of some buildings, TVA would need to separate and reconnect utilities where those systems are interconnected. While this process may require additional work, it is not anticipated to affect capacity or service of utilities because the geographic area of service would not change, and TVA’s utility use (e.g., electrical consumption, etc.) would likely decrease. There may be a short-term interruption in some utilities or services during this phase, the impacts of which would be minor because employees could work remotely. Future uses of disposed buildings cannot be reasonably predicted, but renovated buildings may result in a lower demand for utilities and service systems due to reduced energy consumption associated with modern building practices.

3.9 Socioeconomics and Environmental Justice

The Project Area is located within the City of Chattanooga in Hamilton County, Tennessee. Population and income estimates are derived from US Census data and provided in Table 3-4 below.

Table 3-5. Population and Income

Metric	Tennessee	Hamilton County	City of Chattanooga	Census Tract 31
Total Population	6,910,840	366,207	181,099	1,987
Median Household Income	\$65,254	\$76,219	\$64,340	\$74,755
Individuals Living Below Poverty	13.3%	11.3%	15.3%	12.6%
Minority Population	27.8%	30.4%	43.9%	21.4%

Source: US Census Bureau 2020

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) mandates federal agencies consider potentially disproportionate health or environmental impacts that their activities may have on minority or low-income populations. Executive Order 14096 (Revitalizing our Nation’s Commitment to Environmental Justice for All) builds upon and reinforces the federal government’s commitment to deliver environmental justice to all communities across America. TVA routinely evaluates the potential impacts of its actions on low-income and minority populations in environmental reviews.

According to a query of the CEQ's Climate and Economic Justice Screening Tool v1.0 (CEQ 2022), Census Tract 31, which includes the COC, does not qualify as a disadvantaged community in regard to environmental justice. However, several other Census Tracts in Chattanooga are considered disadvantaged communities. These include two adjacent Census Tracts: Census Tract 16, located approximately 0.1 miles west of the COC, meets environmental justice burden thresholds for health, energy, housing, legacy population, and transportation; and Census Tract 8, located approximately 1 mile north of the COC, meets environmental justice burdens for climate change, housing, and legacy population. A query of the USEPA's Environmental Justice Screening and Mapping Tool v2.2 (USEPA 2023d) using a 1-mile buffer around the COC corroborated the results of the CEQ screening tool.

As discussed in Section 1.1, a substantial percentage of TVA COC office employees have worked in a hybrid work environment since 2020. This has led to the COC being significantly underutilized.

Many TVA employees at the COC spend money at nearby businesses such as restaurants. Most TVA employees who commute via car also utilize private parking lots near the COC because the COC has limited on-site parking (a total of 26 parking spaces across all lots, pull-throughs, and docks).

3.9.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or renovation activities and, therefore, no anticipated changes would be expected with regards to socioeconomics and environmental justice.

3.9.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. TVA employees would work at a new office site, representing a continuation of current spending at local businesses.

Demolition would result in minor, short-term beneficial impacts on socioeconomics through the temporary use of construction workers. TVA anticipates requiring approximately 96 workers during the 10-month demolition phase. Workers local to Hamilton County and surrounding counties would not generate additional lodging taxes but may increase expenditures at local businesses. Beneficial impacts would extend to environmental justice if workers were hired from disadvantaged communities. Indirect effects would be minor and include spending by workers in the local economy.

Adverse impacts on nearby disadvantaged communities could include demolition noise and traffic disruptions. The USEPA has identified typical background noise levels of 70 dBA in urban settings (USEPA 1971). Demolition noise would attenuate to urban background levels at a distance of 0.08 miles. As a result, demolition noise would not affect residents in Census Tract 8 because it is 1 mile away from the COC, or the closest residences in Census Tract 16 which are approximately 0.2 miles from the COC.

Road closures or detours during demolition are not anticipated to affect Census Tract 8 because it is 1 mile away from the COC, on the opposite bank of the Tennessee River. West 12th Street is one connection between downtown and Census Tract 16; a closure or detour affecting this road could affect access to Census Tract 16. The impact would be temporary and minor because West 12th Street is one of multiple roads used to access

Census Tract 16 and because the contractor would implement a traffic management plan to minimize truck- and construction equipment-related disruptions on roads near the COC. Businesses along roads that are closed or used for construction traffic during demolition may experience temporary minor impacts due to limited access and the potential need for alternate entrances.

Although specific future uses of the COC site cannot be reasonably predicted, the COC is currently underutilized and future development that more fully utilizes the site would increase economic activity downtown. The degree of beneficial impacts (e.g., minor, moderate, large) would depend on the specific future use(s).

3.9.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. TVA employees would work at a new office site, representing a continuation of current spending at local businesses. Any future development that more fully utilizes the site would increase economic activity downtown.

3.9.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts from demolition and renovation would be similar to those under Alternative 2, except that additional workers would be required for renovation in addition to demolition. Worker estimates for the four options in Alternative 4 range from 128 to 174 people, providing an additional employment benefit and indirect benefits through spending at local businesses. Under each option, renovation would also provide additional short-term socioeconomic benefits from the purchase of building materials, construction supplies, and construction equipment.

Similar to Alternative 2, road closures and construction traffic during demolition or renovation may temporarily impact businesses through limited access and need for alternate entrances. Local retail businesses and restaurants would benefit most from options that could maximize the number of employees (TVA and otherwise) and/or visitors at the COC. As under Alternative 2, there would be benefits from any future development that more fully utilizes the site and increases downtown economic activity. The degree of beneficial impacts (e.g., minor, moderate, large) would depend on the specific future use(s).

3.10 Public Health and Safety

The mission of OSHA, a division of the US Department of Labor, is to ensure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education, and assistance. The State of Tennessee has an OSHA-approved plan under the Tennessee Occupational Safety and Health Administration which covers employees in the private sector and state and local government.

TVA implements a contractor safety program that ensures a safety management system is in place for contract employees to actively participate in hazard recognition and control. Contractors must submit a Site-Specific Safety Plan (SSSP) in accordance with TVA guidelines and are audited by TVA based on their execution of the SSSP and adherence to TVA safety expectations (TVA 2020a). TVA also expects employees to follow safety guidelines outlined in the TVA Safe Work Requirements Manual (TVA 2020b).

Some wastes generated by demolition and renovation activities can pose a health and safety hazard. Exposure to these wastes (e.g., asbestos-containing materials) can occur for persons working on or accessing (e.g., trespassing) a project site and persons working or living adjacent to a project site. Currently, solid, hazardous, and liquid wastes discharges, and air emissions are managed in accordance with applicable federal, state, and local laws and regulations and applicable permit requirements. Furthermore, waste reduction practices are employed, including recycling and waste minimization. TVA is committed to complying with applicable regulations, permitting, and monitoring requirements to protect public and occupational health and safety.

3.10.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or renovation activities, and therefore no impact on public health and safety.

3.10.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Worker activity under Alternative 2 would comply with federal and state safety regulations, including donning appropriate personal protective equipment, maintaining equipment in good working order, and providing adequate training for work performed, which minimizes safety risks. Any hazardous materials associated with the existing buildings and structures would be removed and discarded in accordance with applicable federal, state, and local requirements (see Section 3.16 for additional information).

During demolition, customary industrial safety standards as well as the establishment of appropriate BMPs and a project-specific safety plan would describe how job safety would be maintained during the project. These BMPs and site safety plans address the implementation of procedures to ensure that equipment guards, housekeeping, and personal protective equipment are in place; the establishment of programs and procedures for lockout, right-to-know, confined space, hearing conservation, forklift operations, excavations, grading and other activities; the performance of employee safety orientations and regular safety inspections; and the development of a plan of action for the correction of any identified hazards. It is TVA policy that all contractors have in place a site-specific health and safety plan prior to conducting construction activities on TVA property. Trained, experienced, and certified/accredited safety professionals would be onsite throughout the demolition or renovation of the COC. One safety professional would be on-site full time and dedicated to safety program implementation, monitoring, enforcement, reporting, and compliance.

The contractor would employ the following BMPs to be compliant with local, state, and federal regulations:

- Demolition, construction and/or external renovation would only occur between designated hours in accordance with the City's noise ordinance.
- A hazardous materials survey would be performed prior to demolition or renovation of the COC buildings to determine the presence of asbestos and lead containing materials. If found, they would be abated and disposed of in accordance with state and federal regulations.

- Demolition and renovation activities would comply with the OSHA Lead in Construction Standard 29 CFR 1926.62.
- Recyclable and non-recyclable waste generated during demolition or renovation would be disposed of at permitted facilities.
- Wet suppression would be used during demolition, renovation, and/or construction to control dust and other emissions.
- The contractor would comply with TVA's Safety Manual for Lead, Silica, Respiratory Protection, Hazard Communication, and Rigging.
- The contractor would comply with TVA's Safe Work Requirements Manual.
- Prior to demolition, renovation, and/or construction activities, a NPDES permit for discharges of stormwater from site activities would be obtained and a SWPPP prepared.

An increase in vehicle miles is a factor in injury and fatal traffic crash rates. Therefore, there would be a temporary minor adverse impact on public safety due to increased traffic in the COC vicinity during demolition. Trespassing and vandalism would not be a notable issue under this alternative because the site would be fenced and there would be little to attract unauthorized persons. As such, potential effects on public health and safety are not anticipated.

Overall, worker safety procedures, implementation of BMPs, and security measures would minimize potential health and safety risks. Therefore, impacts on public health and safety under Alternative 2 are expected to be minor and short term.

3.10.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an "as-is, where-is" state. There would be no impacts on public health or safety.

3.10.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on public health and safety from demolition or renovation would be similar to or less than those described under Alternative 2 and 3 because fewer structures would be affected. Overall, worker safety procedures, BMPs, and security measures would minimize potential health and safety risks. Therefore, impacts to public health and safety under Alternative 4 are expected to be minor and short term.

3.11 Wildlife

The COC is in downtown Chattanooga, Tennessee, and encompasses five buildings that are operationally connected across 9.3 acres with the only vegetation present being manicured landscaping including planted trees alongside streets and in courtyards.

While the COC is in sound condition, some wildlife are known to use human-made structures opportunistically. Common mammals, birds, and reptiles have been observed using parts of buildings abandoned or used infrequently by humans. Several species of

bats commonly found in this region, such as big brown bats and eastern red bats, may roost in abandoned, dark or quiet areas of these buildings (Harvey 1992). Although one bat was observed by TVA staff inside a COC building several years ago, it is likely that opportunistic entry is rare, and no other bats have been reported at the COC. Migratory birds may also roost in buildings or areas of buildings used infrequently. Birds that have been observed nesting or roosting in TVA fossil plant buildings and structures include American robin, barn swallow, barn owl, Carolina wren, mourning dove, northern mockingbird, osprey, and rock dove. No migratory bird nests have been observed on or in the COC building. Other mammals and reptiles that may opportunistically use human structures and have been observed in TVA buildings include Norway rats, eastern woodrats, black rat snake, eastern gray squirrel, house mouse, northern raccoon, and Virginia opossum.

Planted trees and small areas of mowed grass exist around the buildings in this urban landscape. Tree species include crepe myrtle, ginkgo, magnolia, red oak, willow oak, red maple, birch, and flowering dogwood. Several of the trees are still young. Species that may use or were observed using these courtyard areas or planted trees along the street for foraging and/or nesting include American robin, blue jay, house finch, house sparrow, mockingbird, mourning dove, and tufted titmouse (National Geographic 2002). Where there are cracks, crevices, or dying branches, there may be low to moderate quality foraging and roosting habitat for several common species of bat (see Figure 6). Some examples of common bat species likely found within this habitat include big brown and eastern red bat. However, the density of the urban development and the constant disturbance (noise vibrations) coming from traffic and other typical background activities make these trees unlikely for use for anything other than a temporary night roost for bats. Eastern chipmunk, northern raccoon, and Virginia opossum are other mammals that may be present within this habitat (Whitaker 1996). A squirrel nest was observed in a willow oak within the project area during field surveys on September 20, 2023. Due to the density of the urban development around the project area, reptiles and amphibians are unlikely to be found in the project area.

A review of the TVA Regional Natural Heritage database in September 2023 indicated that 11 caves are known within 3 miles of the project area, the closest of which is approximately 2.20 miles away. In addition, two colonial wading bird colonies have been documented within 3 miles of the project area, the closest of which is approximately 1.04 miles from the project area.

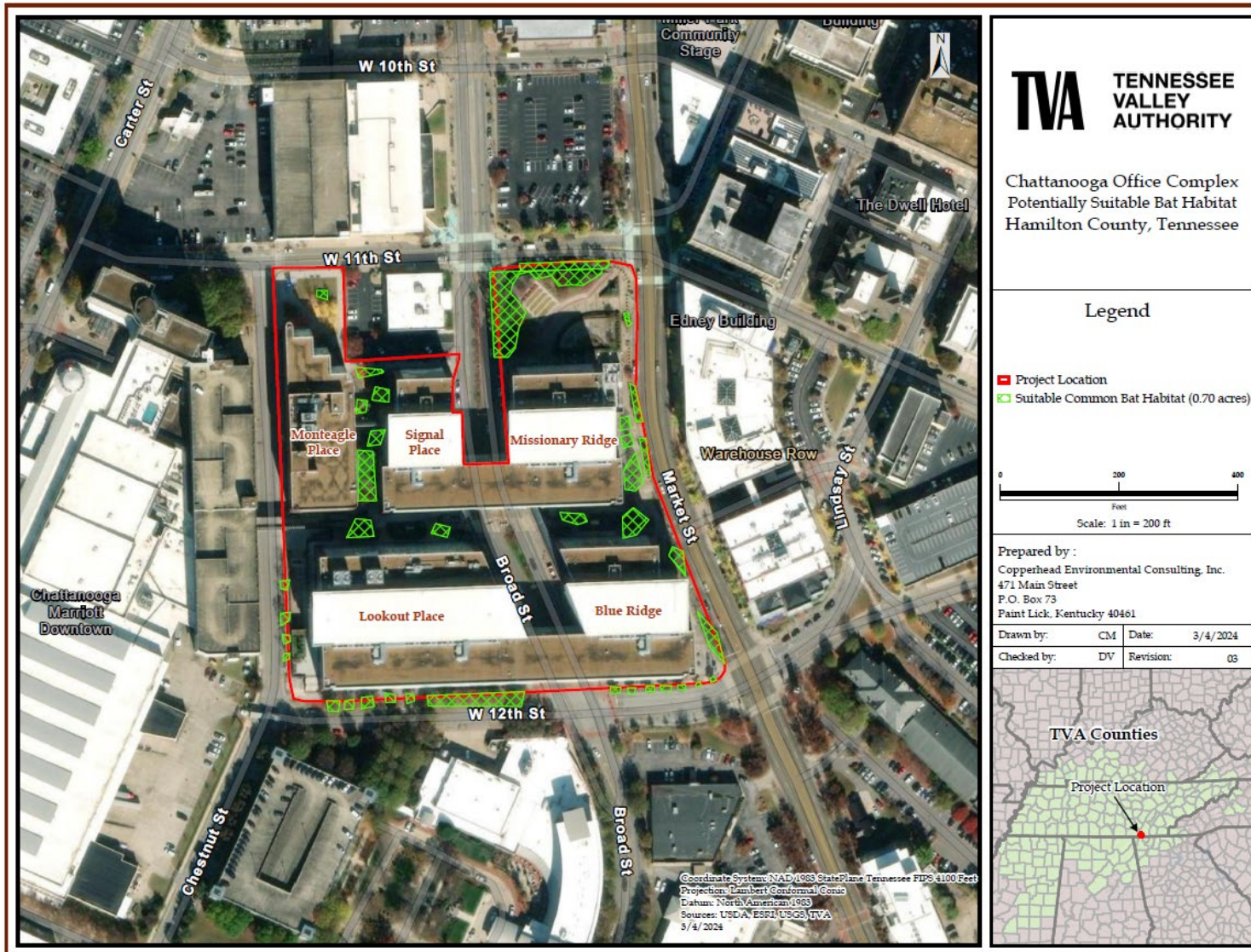


Figure 6. Potentially Suitable Common Bat Habitat.

A review of the USFWS Information for Planning and Consultation (IPaC) in September 2023 indicates 14 migratory bird species of concern have the potential to occur in the project area. These include bald eagle, black-billed cuckoo, bobolink, Canada warbler, cerulean warbler, chimney swift, eastern whip-poorwill, golden-winged warbler, Kentucky warbler, prairie warbler, prothonotary warbler, red-headed woodpecker, rusty blackbird, and wood thrush (USFWS 2023a). No habitat exists for any of these species of birds within the project area.

3.11.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and landscaped vegetation and buildings would continue to be maintained as they are currently. Urban wildlife that currently uses mowed grass and planted vegetation including trees would continue to opportunistically use the project area.

3.11.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. This alternative would result in disturbance and displacement of urban wildlife in the project footprint due to the permanent removal of some structures. Displaced wildlife may move into adjacent areas with similarly developed habitat common around the city. Direct effects of building demolition may occur to some individuals that may be immobile during the time of construction (i.e., juvenile animals or eggs). This could be the case if demolition activities took place during breeding/nesting seasons.

All buildings and trees with the potential to be demolished under Alternative 2 were observed and preliminarily assessed for potential use by wildlife during field surveys in September 2023. Only one nest was found in trees surrounding the COC (a squirrel nest). At the time of survey, the buildings are well-maintained and portions are still being actively used by TVA employees. If these buildings are left vacant and maintenance decreased such that wildlife openings are created (broken windows or doors, cracks in the exterior, etc.), they may be opportunistically used by protected wildlife (i.e., migratory birds or colonies of bats). Therefore, should buildings be left unmaintained, a survey of these buildings would be performed at least once per month prior to demolition to determine if they are being used by migratory birds or other protected wildlife. Should they be found, the timing of deconstruction/demolition actions would be modified as feasible to avoid nesting seasons of migratory birds observed in future surveys. If avoidance cannot occur, coordination with USDA-Wildlife Services (or other state and federal agencies as appropriate) would be required for guidance to ensure compliance under EO 13186 (Responsibilities of Federal Agencies to Protect Migratory Birds). If colonies of bats or other protected wildlife species are observed in buildings proposed for demolition, coordination with the appropriate state and federal agencies would occur in order to minimize impacts.

Migratory birds of conservation concern identified by the USFWS, except the chimney swift, require forested or prairie-like habitat for some or all or part of their life history. No suitable habitat for identified migratory birds of conservation concern exists in the project area. Bald eagle, black-billed cuckoo, bobolink, Canada warbler, cerulean warbler, chimney swift, eastern whip-poorwill, golden-winged warbler, Kentucky warbler, prairie warbler, prothonotary warbler, red-headed woodpecker, rusty blackbird, and wood thrush would not be impacted by the proposed actions.

The closest known caves are greater than 2 miles away. Due to the sufficient distance of proposed actions from these caves, they would not be impacted by the proposed actions.

In summary, due to the implementation of measures including a survey of unmaintained buildings and possible coordination with USDA-Wildlife Services (or other state and federal agencies as appropriate), impacts on wildlife would be minor.

3.11.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. Because no ground disturbance would occur, there would be no impacts on wildlife or their habitats. After disposal, it would be the responsibility of the new owner to comply with all state and federal laws regarding impacts to protected wildlife for future activities under their control.

3.11.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). The types of impacts on wildlife would be a combination of those as described under Alternative 2 and 3 depending on the option selected.

3.12 Threatened and Endangered Species

This section addresses threatened and endangered terrestrial wildlife species. There is no suitable habitat or potential for impacts on threatened and endangered aquatic or vegetation species, and they are not carried forward for detailed analysis.

A review of the TVA Natural Heritage Project Database in September 2023 identified records of three Tennessee state-listed terrestrial animal species (Tennessee cave salamander, Bachman’s sparrow, and osprey) and one federally listed species (northern long-eared bat) within 3 miles of the project footprint. One additional federally listed terrestrial animal species (gray bat), one federally protected species (bald eagle), and one federally proposed endangered species (tricolored bat) has been reported from Hamilton County, Tennessee (Table 3-5). Additionally, the federally endangered Indiana bat has been documented migrating through Hamilton County, Tennessee. A review of the USFWS IPaC website identified one candidate species (monarch butterfly) and one additional federally listed species (whooping crane) that have the potential to occur in the project area (USFWS 2023a). Thus, impacts to these species have also been evaluated.

Table 3-6. Federally and State-Listed Terrestrial Animal Species Located Within Hamilton County, Tennessee and Other Species of Concern Documented Within 3 Miles of the Project Footprint

Common Name	Scientific Name	Federal Status ¹	State Rank ^{1,2}
Amphibians			
Tennessee cave salamander	<i>Gyrinophilus palleucus</i>	--	T(S2)
Birds			
Bachman’s sparrow	<i>Peucaea aestivalis</i>	--	E(S1B)
Bald eagle ³	<i>Haliaeetus leucocephalus</i>	DL	D(S3)
Osprey	<i>Pandion haliaetus</i>	--	(S3)
Whooping crane ⁴	<i>Grus americana</i>	EXPN	(SX)
Invertebrates			
Monarch butterfly ⁵	<i>Danaus plexippus</i>	C	(S4)
Mammals			
Gray bat ⁴	<i>Myotis grisescens</i>	E	E(S2)
Indiana bat ⁴	<i>Myotis sodalis</i>	E	E(S1)
Northern long-eared bat	<i>Myotis septentrionalis</i>	T	T(S1S2)
Tricolored bat ⁴	<i>Perimyotis subflavus</i>	PE	T(S2S3)

Source: TVA Regional Natural Heritage Database and USFWS Information for Planning and Consultation (<https://ecos.fws.gov/ipac/>), extracted September 1, 2023.

¹ Status Codes: C = Candidate Species; D = Deemed in Need of Management; DL = Delisted; E = Endangered; EXPN = Experimental Population, Non-Essential; PE = Proposed Endangered; T = Threatened.

² State Ranks: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable; S4 = Apparently Secure; S#B = Rank of Breeding population; SX = Presumed Extirpated.

³ Species that has not been documented within three miles of the project area but has been documented within Hamilton County, Tennessee.

⁴ Species has not been documented within three miles of the project area or from Hamilton County, Tennessee; USFWS has determined this species may occur in the project footprint.

⁵ Historically this species has not been tracked by state or federal heritage programs; USFWS has determined that this species could occur within the project area.

Tennessee cave salamanders occur in and around streams and pools in caves. They are typically found in shallow, calm sections of subterranean streams but can also be found in other wet areas in the dark zones of caves (Niemiller et al. 2011). The closest record of the Tennessee cave salamander is from a cave approximately 2.25 miles away from the project footprint. Eleven caves are known within 3 miles of the project area, the closest of which is approximately 2.20 miles away. No caves occur in or adjacent to the project footprint.

Bald eagles are protected under the Bald and Golden Eagle Protection Act (USFWS 2013). This species is associated with larger mature trees capable of supporting its massive nests. These are usually found near larger waterways where the eagles forage (USFWS 2007). Six bald eagle nests have been documented in Hamilton County, the closest of which is approximately 10.47 miles away. Due to the distance away from known nests, proposed actions would not impact any bald eagle nests. No bald eagle habitat occurs in or adjacent to the project footprint.

Bachman's sparrows are small songbirds found in mature open pine woodland forests and are rare in Tennessee. Bachman's sparrow is only found in Tennessee during the spring/summer breeding season, and it will build nests on or near the ground under hanging vegetation (Dunning et al. 2020). A historical record from 1979 of a Bachman's sparrow is known approximately 1.61 miles from the project area. No Bachman's sparrow habitat occurs in or adjacent to the project footprint.

Osprey occupy riparian habitats alongside bodies of water such as rivers, lakes and reservoirs. They build nests of sticks on a variety of human-made structures (e.g., transmission line structures, lighting towers) near water (NatureServe 2023). One osprey nest is known within 3 miles of the project footprint. It is approximately 1.83 miles away from the proposed actions. Due to the distance away from known nests, proposed actions would not impact any osprey nests. No osprey habitat occurs in or adjacent to the project footprint.

The whooping crane is a large bird that once occurred throughout North America but has declined to three populations that breed in Canada and winter in coastal Texas. In the Eastern United States, a small captive-raised population breeds in Wisconsin and overwinters in Florida. The whooping crane is listed as Endangered in the Southwest (USFWS Region 2). Outside of this region (including Tennessee), the whooping crane is categorized as a non-essential experimental population. For the purposes of consultation, non-essential experimental populations are treated as species that are federally listed as threatened on National Wildlife Refuge and National Park land (requiring consultation under 7(a)(2) of the Endangered Species Act (ESA)) and as a proposed species on private land (which has no section 7(a)(2) requirements, but Federal agencies must not jeopardize their existence per Section 7(a)(4)). During migration, they may be found in coastal marshes, estuaries, agricultural fields, and other wetland habitats; however, sightings of whooping cranes in Tennessee are rare. No whooping crane habitat occurs in or adjacent to the project footprint.

The monarch butterfly is a highly migratory species, with eastern United States populations overwintering in Mexico. Monarch populations typically return to the eastern U.S. in April (Davis and Howard 2005). Summer breeding habitat requires milkweed plant species, on which adults exclusively lay eggs for larvae to develop and feed on. Adults will drink nectar from other blooming wildflowers when milkweeds are not in bloom (NatureServe 2023). All courtyard areas are limited to trees and grasses and do not provide host plants or a reliable source of flowering plants on which to feed. No monarch butterflies were observed during field reviews.

Gray bats roost in caves year-round and migrate between summer and winter roosts during spring and fall (Brady et al. 1982, Tuttle 1976a). Bats disperse over bodies of water at dusk where they forage for insects emerging from the surface of the water (Tuttle 1976b). Although they prefer caves, gray bats have been documented roosting in large numbers in buildings (Gunier and Elder 1971). Five records of gray bats are known from Hamilton County, the closest of which is approximately 10.78 miles away.

Indiana bats hibernate in caves in winter and use areas around them for swarming (mating) in the fall and staging in the spring, prior to migrating back to summer habitat. During the summer, Indiana bats roost under the exfoliating bark of dead snags and living trees in mature forests with an open understory and a nearby source of water (Pruitt and TeWinkel 2007, Kurta et al. 2002). Although less common, Indiana bats have also been documented

roosting in buildings (Butchkoski and Hassinger 2002). Indiana bats are known to change roost trees frequently throughout the season, while still maintaining site fidelity, returning to the same summer roosting areas in subsequent years (Pruitt and TeWinkel 2007). The closest known record of this species is from a bat tracked during migration to a roost tree used for one night in 2012, approximately 21.9 miles away.

The northern long-eared bat predominantly overwinters in large hibernacula such as caves, abandoned mines, and cave-like structures. During the fall and spring, they use entrances of caves and the surrounding forested areas for swarming and staging. In the summer, northern long-eared bats roost individually or in colonies beneath exfoliating bark or in crevices of both live and dead trees (typically greater than 3 inches in diameter). Roost selection by northern long-eared bat is similar to that of Indiana bat, however northern long-eared bats are thought to be more opportunistic in roost site selection. This species also roosts in abandoned buildings and under bridges. Northern long-eared bats emerge at dusk to forage below the canopy of mature forests on hillsides and roads, and occasionally over forest clearings and along riparian areas (USFWS 2014). The closest known record of this species is from 2011 in a cave approximately 2.25 miles away.

Tricolored bats hibernate in caves or man-made structures such as culverts or bridges (Fujita and Kunz 1984, Newman et al. 2021). During the summer, tricolored bats roost in clumps of tree foliage, often in oak and hickory trees (Veilleux et al. 2003, O’Keefe et al. 2009, Schaefer 2017, Thames 2020). Foraging studies of tricolored bats are lacking, but it is believed they typically forage near their roost trees in forested areas and riparian corridors. The nearest known tricolored bat record is in a cave approximately 2.24 miles away.

There are 11 caves known within 3 miles of the project actions, the closest of which is approximately 2.20 miles away. A negligible amount of foraging habitat for bat species exists in the project footprint in the form of planted landscaping trees. Two of the planted trees also have holes, cracks, or crevices (a Bradford pear and a young red oak), however, due to their location in a highly developed urban landscape, these trees are not considered suitable habitat for Indiana bats, northern long-eared bats, or tricolored bats, per 2023 USFWS guidelines (USFWS 2023b). Currently, buildings in the project footprint do not provide suitable roosting habitat for bats. However, suitable roosting habitat for these species may become available if buildings are left unoccupied and unmaintained such that openings form (e.g., broken windows, cracks in exterior) and wildlife is able to opportunistically enter the buildings.

3.12.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and landscaped vegetation and buildings would continue to be maintained as they are currently. No impacts on threatened and endangered species or their habitats would occur.

3.12.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Of the 10 state or federally listed species identified as having the potential to occur in the Project Area, no suitable habitat exists in the action area for six of them.

No caves occur in or adjacent to the project footprint. Due to the distance from the project footprint to known caves, the proposed project actions would not impact known caves or

habitat for Tennessee cave salamanders. Tennessee cave salamanders would not be impacted by the proposed actions under Alternative 2.

No bald eagle or osprey habitat occurs in or adjacent to the project footprint. No bald eagle or osprey nests occur within a mile of the proposed actions. Proposed actions under Alternative 2 would not impact bald eagles or ospreys and are in compliance with the National Bald Eagle Management Guidelines.

No suitable habitat exists in the action area for Bachman's sparrow or whooping crane. Neither of these species would be impacted by the proposed actions under Alternative 2.

All courtyard areas are limited to trees and grasses and do not provide host plants or a reliable source of flowering plants on which monarch butterflies may feed. No monarch butterflies were observed during field reviews. Monarch butterflies would not be impacted by the proposed actions under Alternative 2.

No caves for gray bat, Indiana bat, northern long-eared bat, or tricolored bat exist in the project footprint or would be impacted by the proposed actions under Alternative 2. Trees that could be removed may only provide a negligible amount of foraging habitat for these bats and do not provide suitable roosting habitat for Indiana bat, northern long-eared bat, or tricolored bat. Currently, buildings in the project footprint do not provide suitable roosting habitat for bats, however, suitable roosting habitat for these species may become available if buildings are left unoccupied and unmaintained such that openings form (e.g., broken windows, cracks in exterior) and wildlife is able to opportunistically enter the buildings. Therefore, should buildings be left unmaintained, a survey of these buildings would be performed at least one month prior to demolition to determine if they are being used by bats.

A number of activities associated with the proposed project, including building demolition, were addressed in TVA's programmatic consultation with the USFWS on routine actions and federally listed bats in accordance with ESA Section 7(a)(2) which was completed in April 2018 and updated in May 2023. For those activities with potential to affect bats, TVA committed to implementing specific conservation measures. These activities and associated conservation measures are identified in the TVA Bat Strategy Project Screening Form (Appendix B) and need to be reviewed/implemented as part of the proposed project. With adherence to identified conservation measures, survey requirements, and Section 7 ESA consultation requirements, proposed actions would not significantly impact gray bat, Indiana bat, northern long-eared bat, or tricolored bat.

3.12.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an "as-is, where-is" state. Because no ground disturbance would occur, there would be no impacts on threatened and endangered species or their habitats. After disposal, it would be the responsibility of the new owner to comply with all state and federal laws regarding impacts to threatened and endangered species and their habitats for future activities under their control.

3.12.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on threatened and endangered species would be a combination of those as described under Alternative 2 and 3 depending on the option selected.

3.13 Cultural Resources

Existing conditions for cultural resources are presented in the following discussion for the vicinity of the COC. The COC was constructed between 1980 and 1984 and therefore fails to meet the 50-year minimum threshold for buildings to be considered historic. In 2017, TVA evaluated the COC’s potential eligibility under Criteria Consideration G (“properties achieving significance within the past 50 years if they are of exceptional importance”). TVA found the COC did not satisfy Criteria Consideration G, and the State Historic Preservation Officer (SHPO) concurred.

New South Associates, Inc., performed a phase I cultural resources survey for Potomac-Hudson Engineering, Inc., (under contract with the GSA) in 2023 (Simpson et al. 2023). The survey included a desktop review of available information and documentation of existing historic architectural resources within one block (170 meters, or 558 feet). According to the survey, this study area overlaps with four historic districts. However, according to the Tennessee Historical Commission Online Viewer, the study area only overlaps three historic districts (Table 3-6). Four individual buildings within these districts fall within their study boundary and have at least some views of the COC (Table 3-7).

Table 3-7. NRHP-Listed Historic Districts Within One Block of the COC

Name	Listed Date	Criteria of Significance	Period(s) of Significance
Market and Main Streets	1992	A, C	1875-1899 1900-1942 1925-1949
Market Street Warehouse District	1984	A, C	1900-1924 1925-1949 1950-1974
Stone Fort Land Company	1999	A, C	1882-1933

Source: National Register of Historic Places 2023

Table 3-8. NRHP-eligible buildings within one block of, and within view of, the COC

Property Number	Name
HN-426	Volunteer Garage
HN-459	Patten Tower
HN-461	Southern Express Building
HN-467	Southern Railway Freight Depot

From 1979 to 1981, the University of Tennessee-Chattanooga completed archaeological background research and field investigations at the then-proposed COC site. Background research revealed the affected area is on the site of the Union Depot and Railyard, which opened in 1857 and was demolished in the 1970s following decades of diminishing use. The investigation included reconnaissance testing, which resulted in the identification of hundreds of cultural features related to the former railyard; the content of the features was dominated by the by-products of coal combustion from steam locomotives and small power plants supplying machine shops in the vicinity. The investigation also identified building foundations, track underlayment, and a historic drainage system. Following the reconnaissance, the university completed feature excavations with the goal of collecting as much data as possible prior to the start of COC construction. Based on the Simpson et al.

(2023) study, TVA finds that due to the prior archaeological excavations and COC construction there is no remaining archaeological potential at the site. TVA consulted with the Tennessee SHPO and Tribes; the SHPO concurred with this finding and none of the consulted tribes objected or identified resources of concern in the project footprint.

3.13.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no effects on historic properties.

3.13.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition of buildings is a type of action that has potential for effects on historic properties if any are present. Such historic properties could include the buildings to be demolished and any archaeological sites located in the ground beneath the buildings that could be affected by associated ground disturbance. As the COC is ineligible for the NRHP and there are no longer any intact archaeological deposits on the site, TVA finds that demolition would not affect any historic properties. TVA also evaluated whether disposal of the COC could result in effects on historic properties. If any historic property were present in the area of potential effect (APE), transfer of that property outside of federal control without legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance would constitute an adverse effect pursuant to 36 CFR Part 800.5(a)(2)(vii). However, TVA has determined there are no historic properties in the APE. Disposal may be followed by future development of the property. However, any such plans would be developed after TVA's disposal of the property and the scale, specific location, design, and appearance of any future buildings is not reasonably foreseeable and would be outside of TVA's control and responsibility. Therefore, TVA finds that the analysis must be limited to TVA actions that are reasonably foreseeable under Alternative 2. The potential effects of these actions are limited to the COC itself and the ground underneath it, and TVA has found that these actions would not affect historic properties. TVA consulted with the Tennessee SHPO and Tribes; the SHPO concurred with this finding and none of the consulted tribes objected or identified resources of concern in the project footprint.

3.13.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an "as-is, where-is" state. Disposal may be followed by future development of the property, which could include demolition of one or more of the buildings. However, any such plans would be developed after TVA's disposal of the property and the scale, specific location, design, and appearance of any future buildings and the scale of the demolition is not reasonably foreseeable and would be outside of TVA's control and responsibility. Therefore, TVA finds that the analysis must be limited to TVA actions that are reasonably foreseeable under Alternative 3. If any historic property were present in the APE, transfer of that property outside of federal control without legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance would constitute an adverse effect pursuant to 36 CFR Part 800.5(a)(2)(vii). However, as there are no historic properties in the APE, TVA finds that Alternative 3 would not affect any historic properties. TVA consulted with the Tennessee SHPO and Tribes; the SHPO concurred with this finding and none of the consulted tribes objected or identified resources of concern in the project footprint.

3.13.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e.,

demolition, as-is, or a combination thereof). Disposal may be followed by demolition of one or more of the buildings and by future development of the property. However, any such plans would be developed after TVA’s disposal of the property and the scale, specific location, design, and appearance of any future buildings is not reasonably foreseeable and would be outside of TVA’s control and responsibility. Therefore, TVA finds that the analysis must be limited to TVA actions that are reasonably foreseeable under Alternative 4. If any historic property were present in the APE, transfer of that property outside of federal control without legally enforceable restrictions or conditions to ensure long-term preservation of the property’s historic significance would constitute an adverse effect pursuant to 36 CFR Part 800.5(a)(2)(vii). However, TVA has found there are no historic properties in the APE. As the COC is ineligible for the NRHP, renovation has no potential to affect historic properties. Therefore, TVA finds that Alternative 4, including all options, would not affect historic properties. The SHPO concurred with this finding and none of the consulted tribes objected or identified resources of concern in the project footprint.

3.14 Managed and Natural Areas

Managed areas include lands held in public ownership that are managed by an entity (e.g., TVA, US Department of Agriculture, US Forest Service, State of Tennessee) to protect and maintain certain ecological and/or recreational features. Natural areas include ecologically significant sites; federal, state, or local park lands; national or state forests; wilderness areas; scenic areas; wildlife management areas; recreational areas; greenways; trails; Nationwide Rivers Inventory streams; and wild and scenic rivers. Ecologically significant sites are either tracts of privately owned land that are recognized by resource biologists as having significant environmental resources or identified tracts on TVA lands that are ecologically significant but not specifically managed by TVA’s Natural Areas program. A review of the TVA Natural Heritage Project database identified three managed and natural areas within 1 mile of the Project Area (Table 3-8 and Figure 7).

Table 3-9. Managed and Natural Areas Within 1 Mile of the COC

Natural Area	Acres	Distance from Project Area
MacLellan Island Audubon Society Wildlife Refuge	29	1.0 miles
Ross Landing City Park	20	0.9 miles
University of Tennessee Chattanooga Campus / Arboretum	338	0.3 miles

Source: TVA Natural Heritage Project Database

3.14.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and therefore no impacts on managed or natural areas.

3.14.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Potential impacts include noise, fugitive dust and debris, and traffic within a 1-mile radius of the COC. Demolition is not anticipated to restrict or delay access to managed or natural areas because these areas are accessible via multiple roads.

Noise impacts are not anticipated to adversely affect management of these areas or user experiences within them: as stated in Section 3.5, the typical noise level for urban areas is approximately 70 dBA and the highest noise level during demolition would be approximately 89 dBA at a distance of 50 feet. Demolition noise would attenuate to background levels at

approximately 445 feet or 0.08 miles. Because the nearest resource (University of Tennessee-Chattanooga campus and arboretum) is approximately 0.3 miles from the COC, demolition noise would not be noticeable.

Wind-carried dust has potential to affect managed or natural areas, but with implementation of mitigation measures and BMPs in Section 2.3, impacts on managed and natural areas would be minor and temporary.

3.14.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. Because no ground disturbance would occur, there would be no impacts on managed or natural areas.

3.14.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on managed and natural areas would be a combination of those as described under Alternative 2 and 3 depending on the option selected.

3.15 Recreational Resources

As shown in Table 3-9 and Figure 7, there are multiple recreational resources within 1 mile of the COC including city parks, the Chattanooga Riverwalk, and a boat ramp. The parks are popular for walking, running, and general recreation for visitors and residents alike (City of Chattanooga 2023).

Table 3-10. Recreational Resources Within 1 Mile of the COC

Recreational Resource	Distance from COC
AT&T Stadium	0.8 miles north
Boynton Park	0.8 miles north-northwest
Boynton Park	0.8 miles northwest
Chattanooga National Cemetery	1 mile southeast
Confederate Cemetery	0.8 miles northeast
Finley Stadium	0.5 miles southwest
Fort Negley Park	0.6 miles southeast
Fountain Square	0.5 miles north
Jefferson Park	1 mile south-southeast
Maclellan Island	1 mile north-northeast
Main Terrain Art Park	0.4 miles south-southwest
Miller Park	0.2 miles northeast
Phillips Park	0.3 miles northeast
Shelia M. Jennings Westside Park	0.4 miles west
Tennessee Riverwalk	Multiple locations within 1 mile
TVA Boat Ramp	0.8 miles northwest
Water Tower Park	0.7 miles south
Whiteside Park	0.7 miles east-southeast

Source: TVA Natural Heritage Project Database

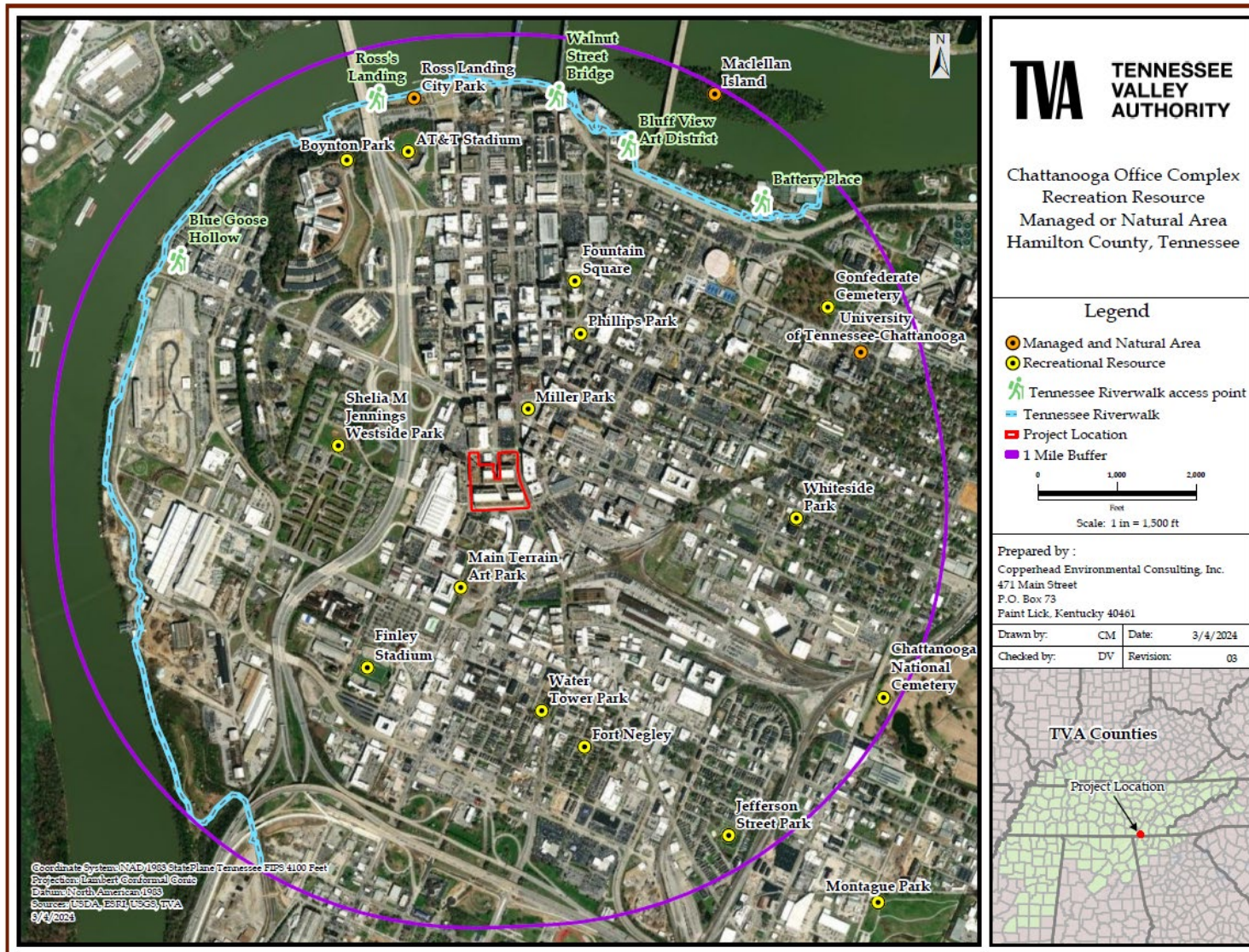


Figure 7. Recreational Resources and Managed and Natural Areas within 1 Mile of the COC.

The Chattanooga Riverwalk is a recreational resource that features a 16.1-mile paved trail system for recreational users and tourists along the southern bank of the Tennessee River. The Chattanooga Riverwalk allows users to visit local recreation sites, shops, restaurants, and other locations in downtown Chattanooga, and is primarily used for biking, walking, running, and dog walking. The Chattanooga Riverwalk also accesses portions of the Tennessee River used for recreational water use, including one TVA boat ramp, located 0.8 miles northwest of the project area. The Riverwalk also includes multiple bike and foot access points along the river, as well as one bike access located just north of the project area (Chattanooga Tourism Company 2023).

3.15.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and therefore no impacts on recreational resources.

3.15.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Potential impacts include noise, fugitive dust and debris, and traffic within a 1-mile radius of the COC. Demolition would have a minor effect on transportation to and from recreation resources that lie on Chestnut Street, Market Street, Broad Street, and West 12th Street, including the TVA boat ramp, Tennessee River Walk, and City of Chattanooga parks such as the Main Terrain Art Park and Shelia M. Jennings Westside Park. Transportation-related impacts would include delays accessing these resources, though the impacts would be minor because these resources are accessible from multiple roads. Noise impacts are not anticipated to adversely affect management of recreational resources or activities within them because demolition noise would attenuate to background levels at a distance of 0.08 miles and the nearest recreational resource is approximately 0.2 miles from the COC. Wind-carried dust has potential to affect recreational resources, but with implementation of mitigation measures and BMPs in Section 2.3, impacts would be minor and temporary.

3.15.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC in an “as-is, where-is” state. Because no ground disturbance would occur, there would be no impacts on recreational resources.

3.15.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on recreational resources would be a combination of those as described under Alternative 2 and 3 depending on the option selected.

3.16 Solid and Hazardous Waste

Solid waste is defined by the 1976 Resource Conservation and Recovery Act (RCRA) as garbage or refuse, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, resulting from industrial, commercial, mining, and agricultural operations, and from community activities. Solid waste generated includes office and workplace waste such as mixed paper products, packaging, cardboard, plastics (water bottles), glass waste, coffee cups, printer cartridges, light bulbs, electronic waste (computers, printers, and smart phones), and food waste/scraps.

Hazardous waste is solid waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment. Known hazardous materials present within the COC include:

- Active Underground Storage Tanks: 15,000 gallons of diesel fuel (approximate based on use; total capacity is 18,000 gallons) Diesel Fuel Day Tanks: 1,000 gallons of diesel fuel
- Refrigerant: 4,000 pounds (in chillers and inventory)
- Lubricating Oil: 50 gallons (in chillers and various equipment)
- Hydraulic Fluid: 50 gallons (in lifts, hydraulic elevator and legacy transformers)
- Batteries: 168 (unsealed lead acid, battery backup for generators)
- Universal Waste: 1,000 fluorescent bulbs (approximate number in use at the Missionary Ridge building)

A Phase I Environmental Site Assessment (Barge Design Solutions 2024) identified the following recognized environmental conditions (RECs) affecting on-site soils:

- Contaminants associated with the historic site use as a railyard;
- Historic use of fill along the railroad bed consisting of lead-bearing foundry sands;
- Possible soil/vapor impacts from chlorinated solvents from the former onsite and/or nearby drycleaners;
- Possible soil/vapor impacts from the former onsite and/or nearby gas stations.

The Phase I ESA disclosed that a 2022 lead paint survey found small amounts of lead paint in Mechanical Room S301 on a pipe flange and bottom plate of a fire pump assembly and that the lead paint has since been removed. There is no evidence of polychlorinated biphenyls (PCB)-containing transformers on-site. Some fluorescent lights with ballasts are on site, although most have been replaced with LED lighting (Barge Design Solutions 2024).

TVA is aware that there is some asbestos present. As noted in the Phase I ESA, TVA made a concerted effort to not use asbestos containing material (ACM) during the construction of the COC. A previous ACM survey discovered a small amount of ACM in a thermal system pipe wrap, which was abated. To identify the location and condition of other potentially harmful substances, a regulated material assessment would be conducted prior to demolition. Regulated materials, if present, would be removed prior to demolition and disposed of at the appropriate permitted facility in accordance with federal, state, and local regulations.

3.16.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and therefore no direct or indirect impacts on solid and hazardous waste.

3.16.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. There would be moderate short-term adverse impacts on solid and hazardous waste from the demolition and removal of approximately 140,000 to 280,000 tons of demolition debris, and the generation of associated waste products.

TVA would manage all solid wastes in accordance with applicable federal, state, and local laws and regulations and TVA BMPs. These wastes would be temporarily stored in properly managed storage areas on-site. Demolition and construction wastes would be hauled by truck to a permitted waste management facility/landfill designated to receive demolition and construction wastes.

Impacts from RECs that were identified during the Phase I ESA would be addressed prior to soil removal. Subsurface soils would be analyzed, and appropriate actions would be taken in accordance with federal and state regulations. TDEC Underground Storage Tank System Closure Assessment Guidelines would be followed for removal of underground storage tanks located on site.

Any asbestos-containing materials located in the buildings would be managed in permitted facilities/landfills. As discussed above, only a minimal amount of asbestos-containing materials are anticipated to be in the current buildings. Hazardous waste would be hauled to a permitted waste management facility designated to receive such waste. Waste would be hauled by truck to offsite landfills or recycling facilities.

Brick, block, and concrete demolition debris not contaminated by asbestos or other hazardous materials would be used as clean fill onsite. The contractor would obtain TVA permits for excavation and drilling/chipping of concrete, as applicable.

Site restoration would require the transport of borrow material from a previously developed or permitted borrow site, resulting in an increase in truck traffic to and from the COC intermittently during the demolition process.

Overall, solid and hazardous waste disposal would have a minor, long-term adverse impact on landfill capacity.

3.16.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC land and buildings “as is-where is”. Disposal of the COC to a non-federal entity may require TVA to certify that the property no longer requires a response action for remediation of on-site RECs that were identified during the Phase I ESA.

3.16.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). Impacts on solid and hazardous waste would be similar to those discussed in Alternative 2, except smaller in scale as only some of the buildings in the COC campus would be demolished.

3.17 Surface Water Quality

The Lower Tennessee River (Nickajack Reservoir) is listed on the Tennessee Department of Environment and Conservation 303(d) list for Dioxin and PCBs from contaminated

sediments (TDEC 2022). The surface water streams would be expected to be designated for domestic water supply, industrial water supply, fish and aquatic life, recreation, livestock watering and wildlife, irrigation, and navigation (TDEC 2019). Stormwater runoff from the COC discharges into the Lower Tennessee River (Nickajack Reservoir) through a municipal stormwater sewer system operated and maintained by the City of Chattanooga.

3.17.1 Alternative 1

Under the No Action Alternative, TVA would continue to operate the 1,480,000 square foot COC. There would be no demolition or construction activities, and therefore no direct or indirect impacts on surface water quality.

3.17.2 Alternative 2

Under Alternative 2, TVA would demolish the COC and dispose of the vacant land. Demolition has the potential to affect surface water quality due to stormwater runoff. A state and/or MS4 construction stormwater permit would be required for demolition of the COC. This permit requires the development and implementation of a BMP plan. Development of the BMP plan would use “A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Construction and Maintenance Activities” as a reference for applicable practices and controls to minimize adverse impacts (TVA 2021). A City of Chattanooga Land Disturbance and/or Stormwater permit would be needed per City of Chattanooga Municipal Codes and Ordinances, and demolition would comply with the City of Chattanooga Code of Ordinances Chapter 31 – Sewers, Mains and Drainage. Potential impacts on surface water quality would be mitigated through implementation of standard BMPs for erosion and sediment control, proper containment/treatment/disposal of wastewaters, stormwater runoff, wastes, and potential pollutants. With implementation of BMPs, impacts on surface water quality would be minor and temporary.

3.17.3 Alternative 3

Under Alternative 3, TVA would dispose of the COC land and buildings “as is-where is”. There would be no site disturbance and therefore no direct or indirect impacts on surface water quality.

3.17.4 Alternative 4

Under Alternative 4, TVA would implement a mix of retention, renovation, and disposal of selected buildings and land through the means described in Alternatives 2 or 3 (i.e., demolition, as-is, or a combination thereof). With implementation of BMPs, impacts on surface water quality from partial renovation or demolition would be minor and temporary – similar to those discussed in Alternative 2, except smaller in scale as only some of the buildings in the COC campus would be demolished.

3.18 Cumulative Impacts

CEQ regulations for implementing NEPA define cumulative effects as “...effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” (40 CFR § 1508.1(g)(3)).

Unless otherwise stated, the geographic scope of analysis for cumulative effects includes the Project Area and a 1-mile buffer. This is the area in which indirect and cumulative effects are expected to occur. Land uses within the 1-mile buffer are mostly within the city

center, including a mix of commercial, industrial, and residential properties, parks, and managed and natural areas.

Past, present, and reasonably foreseeable future actions identified within the geographic scope of analysis include, but are not limited to, the following:

- The COC has been selected by the GSA as one of the sites under consideration for a new Federal courthouse in downtown Chattanooga.
- A continuation of the trend of converting abandoned or underutilized urban buildings to a mix of commercial and residential uses.
- Possible “Reimagining Broad Street” project. Design concepts could include a promenade, wider sidewalks, and altering the number of traffic lanes and placement of bicycle lanes. While the City and its contractor have solicited public input on the proposed project, no formal design has been chosen and no construction date has been chosen.
- No specific road construction or maintenance projects were identified within the geographic scope of analysis, but it is reasonable to assume that local roadways will continue to require maintenance.

As shown in Table 3-10, cumulative effects associated with the Proposed Action in combination with the above identified actions would be insignificant.

Table 3-11. Cumulative Effects

Resource Area	Cumulative Effects
Air Quality	Minor adverse cumulative effects on air quality conditions in Hamilton County.
Land Use	No cumulative effects.
Geology and Soils	Minor adverse cumulative effects due to implementation of Soil Management Plan.
Greenhouse Gases and Climate Change	Minor adverse cumulative effects on and from climate change.
Noise and Vibration	Minor to moderate temporary cumulative effects from contribution of demolition and/or renovation noise and vibration to the urban soundscape.
Transportation	Moderate adverse cumulative effects on traffic flow from temporary closure and traffic volume from demolition worker commutes and truck trips to deliver materials to and from the Project Area.
Visual Resources	Minor adverse cumulative effects from demolition; no cumulative effects from retention.
Utilities and Service Systems	No adverse cumulative effects from continued use or separation and reconnection of utilities and service systems.
Socioeconomics and Environmental Justice	Minor, short-term beneficial contribution to cumulative effects related to employment during renovation or demolition. Increase in economic activity downtown if future owner more fully utilizes COC site.
Public Health and Safety	No indirect effects and, therefore, no cumulative effects.

Resource Area	Cumulative Effects
Wildlife	Minor adverse cumulative effects from loss of common wildlife habitat or mortality during demolition.
Threatened and Endangered Species	Minor adverse cumulative effects from demolition's contribution to broader trend of loss of foraging habitat.
Cultural Resources	No cumulative adverse effects to significant archaeological or historic resources.
Managed and Natural Areas	Minor cumulative effects from increased construction-related traffic and possible road closure(s) during demolition.
Recreational Resources	Minor cumulative effects from increased construction-related traffic and possible road closure(s) during demolition.
Solid & Hazardous Waste	Minor cumulative effects because waste would be handled in accordance with law, regulation, and policy; and would be disposed of at permitted commercial facilities with adequate capacity.
Surface Water Quality	Minor cumulative adverse effects with implementation of erosion and sediment control BMPs; and proper containment/treatment/disposal of wastewaters, stormwater runoff, wastes, and potential pollutants.

3.19 Unavoidable Adverse Environmental Impacts

Unavoidable adverse impacts would vary by alternative. Under Alternative 1, there would be no unavoidable adverse impacts because there would be no changes to the COC. Under Alternative 2, demolition would result in permanent changes to the appearance of the Project Area and would introduce noise, dust, and traffic, the impacts of which would be minimized, but not fully avoided. Unavoidable adverse impacts under Alternative 3 would be limited to any changes the future owner may undertake, the specifics of which are not reasonably foreseeable. Under Alternative 4, unavoidable adverse impacts would be similar to those under Alternative 2.

3.20 Relationship of Short-Term Uses and Long-Term Productivity

NEPA requires a discussion of the relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity. This EA analyzes the potential environmental effects of retaining, renovating, demolishing, and/or disposing of the COC. Short-term uses are those during the up-to-12-month demolition and renovation period. Long-term productivity is associated with post-demolition and post-renovation activities. Because TVA's use of the COC would continue under Alternative 1, retention would not change short-term uses or long-term productivity. In contrast, renovation and demolition would include changes to existing buildings or conversion to vacant land, requiring short-term uses of the land, contract workers, construction material, roadways, and emissions from transportation vehicles, as well as increased noise and vibration from construction equipment use. Disposal would not require any short-term uses, and long-term productivity is unknown because specific future uses are not reasonably foreseeable.

3.21 Irreversible and Irrecoverable Commitments of Resources

A commitment of a resource is "irreversible" when the primary or secondary effects from its use limit future options for its use. An irretrievable commitment refers to the use or consumption of a resource that is neither renewable nor recoverable for use by future generations.

Demolition and renovation would result in the irreversible commitment of landfill space, certain fuels, energy, and construction materials. As discussed in Chapter 3, these impacts would be minor in intensity.

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Education: B.S., Biology; M.S. Biology
Project Role: Geology and Soils
Experience: 4 years of experience with environmental field studies and reporting

Name: **Piper Roby (Copperhead Environmental Consulting, Inc.)**
Education: B.A., Biology; M.S., Biology; PhD, Animal Sciences
Project Role: Technical Editor
Experience: 22 years of experience with ecological reporting and editing.

Name: **Will Seiter (Copperhead Environmental Consulting, Inc.)**
Education: B.S., Wildlife Management
Project Role: Land Use, Transportation
Experience: 6 years of experience with environmental field studies and reporting

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APPENDIX A – CONSULTATION AND COORDINATION

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

2024-01-25 11:27:00 CST

James Osborne
Tennessee Valley Authority
jwosborn@tva.gov

RE: Tennessee Valley Authority (TVA), Divestiture of Chattanooga Office Complex (COC), TVA Tracking Number- 77833965235, Project#: SHPO0004378, Chattanooga, Hamilton County, TN

Dear James Osborne:

In response to your request, we have reviewed the cultural resources survey report and accompanying documentation submitted by you regarding the above-referenced undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Considering the information provided, we concur that no historic properties eligible for listing in the National Register of Historic Places will be affected by this undertaking. If project plans are changed or archaeological remains are discovered during project construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. Please provide your Project # when submitting any additional information regarding this undertaking. Questions or comments may be directed to Kelley Reid, who drafted this response, at Kelley.Reid@tn.gov, +16157701099.

Sincerely,

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

Ref:MSG12013967_ywCMc2HOJlo4F1cygr

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APPENDIX B – BAT STRATEGY PROJECT SCREENING FORM

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Project Review Form - TVA Bat Strategy (06/2019)

This form should **only** be completed if project includes activities in Tables 2 or 3 (STEP 2 below). This form is not required if project activities are limited to Table 1 (STEP 2) or otherwise determined to have no effect on federally listed bats. If so, include the following statement in your environmental compliance document (e.g., add as a comment in the project CEC): "Project activities limited to Bat Strategy Table 1 or otherwise determined to have no effect on federally listed bats. Bat Strategy Project Review Form NOT required." This form is to assist in determining required conservation measures per TVA's ESA Section 7 programmatic consultation for routine actions and federally listed bats.¹

Project Name: COC Divestment **Date:** 10/31/2023
Contact(s): Erica McLamb, Uteva Chesser **CEC#:** **Project ID:** 2023-17
Project Location (City, County, State): Chattanooga, Hamilton County, TN

Project Description:

TVA is evaluating options for fully or partially divesting of the COC, which is too large for TVA's current or projected future needs. Alternatives include 1)demolish and divest, 2) divest "as is, where is" and 3) partial retention and divestment (divestment may include divesting "as is, where is" or demolition of select buildings.

SECTION 1: PROJECT INFORMATION - ACTION AND ACTIVITIES

STEP 1) Select TVA Action. If none are applicable, contact environmental support staff, Environmental Project Lead, or Terrestrial Zoologist to discuss whether form (i.e., application of Bat Programmatic Consultation) is appropriate for project:

- | | |
|---|--|
| <input type="checkbox"/> 1 Manage Biological Resources for Biodiversity and Public Use on TVA Reservoir Lands | <input type="checkbox"/> 6 Maintain Existing Electric Transmission Assets |
| <input type="checkbox"/> 2 Protect Cultural Resources on TVA-Retained Land | <input type="checkbox"/> 7 Convey Property associated with Electric Transmission |
| <input checked="" type="checkbox"/> 3 Manage Land Use and Disposal of TVA-Retained Land | <input type="checkbox"/> 8 Expand or Construct New Electric Transmission Assets |
| <input type="checkbox"/> 4 Manage Permitting under Section 26a of the TVA Act | <input type="checkbox"/> 9 Promote Economic Development |
| <input type="checkbox"/> 5 Operate, Maintain, Retire, Expand, Construct Power Plants | <input type="checkbox"/> 10 Promote Mid-Scale Solar Generation |

STEP 2) Select all activities from Tables 1, 2, and 3 below that are included in the proposed project.

TABLE 1. Activities with no effect to bats. Conservation measures & completion of bat strategy project review form NOT required.		
<input type="checkbox"/> 1. Loans and/or grant awards	<input checked="" type="checkbox"/> 8. Sale of TVA property	<input type="checkbox"/> 19. Site-specific enhancements in streams and reservoirs for aquatic animals
<input type="checkbox"/> 2. Purchase of property	<input type="checkbox"/> 9. Lease of TVA property	<input type="checkbox"/> 20. Nesting platforms
<input type="checkbox"/> 3. Purchase of equipment for industrial facilities	<input type="checkbox"/> 10. Deed modification associated with TVA rights or TVA property	<input type="checkbox"/> 41. Minor water-based structures (this does not include boat docks, boat slips or piers)
<input type="checkbox"/> 4. Environmental education	<input type="checkbox"/> 11. Abandonment of TVA retained rights	<input type="checkbox"/> 42. Internal renovation or internal expansion of an existing facility
<input type="checkbox"/> 5. Transfer of ROW easement and/or ROW equipment	<input type="checkbox"/> 12. Sufferance agreement	<input type="checkbox"/> 43. Replacement or removal of TL poles
<input checked="" type="checkbox"/> 6. Property and/or equipment transfer	<input type="checkbox"/> 13. Engineering or environmental planning or studies	<input type="checkbox"/> 44. Conductor and overhead ground wire installation and replacement
<input type="checkbox"/> 7. Easement on TVA property	<input type="checkbox"/> 14. Harbor limits delineation	<input type="checkbox"/> 49. Non-navigable houseboats

TABLE 2. Activities not likely to adversely affect bats with implementation of conservation measures. Conservation measures and completion of bat strategy project review form REQUIRED; review of bat records in proximity to project NOT required.

<input checked="" type="checkbox"/> 18. Erosion control, minor	<input type="checkbox"/> 57. Water intake - non-industrial	<input type="checkbox"/> 79. Swimming pools/associated equipment
<input type="checkbox"/> 24. Tree planting	<input type="checkbox"/> 58. Wastewater outfalls	<input type="checkbox"/> 81. Water intakes – industrial
<input type="checkbox"/> 30. Dredging and excavation; recessed harbor areas	<input type="checkbox"/> 59. Marine fueling facilities	<input type="checkbox"/> 84. On-site/off-site public utility relocation or construction or extension
<input type="checkbox"/> 39. Berm development	<input type="checkbox"/> 60. Commercial water-use facilities (e.g., marinas)	<input type="checkbox"/> 85. Playground equipment - land-based
<input type="checkbox"/> 40. Closed loop heat exchangers (heat pumps)	<input type="checkbox"/> 61. Septic fields	<input type="checkbox"/> 87. Aboveground storage tanks
<input type="checkbox"/> 45. Stream monitoring equipment - placement and use	<input type="checkbox"/> 66. Private, residential docks, piers, boathouses	<input type="checkbox"/> 88. Underground storage tanks
<input type="checkbox"/> 46. Floating boat slips within approved harbor limits	<input type="checkbox"/> 67. Siting of temporary office trailers	<input type="checkbox"/> 90. Pond closure
<input checked="" type="checkbox"/> 48. Laydown areas	<input type="checkbox"/> 68. Financing for speculative building construction	<input type="checkbox"/> 93. Standard License
<input type="checkbox"/> 50. Minor land based structures	<input type="checkbox"/> 72. Ferry landings/service operations	<input type="checkbox"/> 94. Special Use License
<input type="checkbox"/> 51. Signage installation	<input type="checkbox"/> 74. Recreational vehicle campsites	<input type="checkbox"/> 95. Recreation License
<input type="checkbox"/> 53. Mooring buoys or posts	<input type="checkbox"/> 75. Utility lines/light poles	<input type="checkbox"/> 96. Land Use Permit
<input type="checkbox"/> 56. Culverts	<input type="checkbox"/> 76. Concrete sidewalks	

Table 3: Activities that may adversely affect federally listed bats. Conservation measures AND completion of bat strategy project review form REQUIRED; review of bat records in proximity of project REQUIRED by OSAR/Heritage eMap reviewer or Terrestrial Zoologist.

<input type="checkbox"/> 15. Windshield and ground surveys for archaeological resources	<input checked="" type="checkbox"/> 34. Mechanical vegetation removal, includes trees or tree branches > 3 inches in diameter	<input type="checkbox"/> 69. Renovation of existing structures
<input type="checkbox"/> 16. Drilling	<input type="checkbox"/> 35. Stabilization (major erosion control)	<input type="checkbox"/> 70. Lock maintenance/ construction
<input type="checkbox"/> 17. Mechanical vegetation removal, does not include trees or branches > 3" in diameter (in Table 3 due to potential for woody burn piles)	<input checked="" type="checkbox"/> 36. Grading	<input type="checkbox"/> 71. Concrete dam modification
<input checked="" type="checkbox"/> 21. Herbicide use	<input type="checkbox"/> 37. Installation of soil improvements	<input type="checkbox"/> 73. Boat launching ramps
<input type="checkbox"/> 22. Grubbing	<input type="checkbox"/> 38. Drain installations for ponds	<input type="checkbox"/> 77. Construction or expansion of land-based buildings
<input type="checkbox"/> 23. Prescribed burns	<input type="checkbox"/> 47. Conduit installation	<input type="checkbox"/> 78. Wastewater treatment plants
<input type="checkbox"/> 25. Maintenance, improvement or construction of pedestrian or vehicular access corridors	<input type="checkbox"/> 52. Floating buildings	<input type="checkbox"/> 80. Barge fleeting areas
<input type="checkbox"/> 26. Maintenance/construction of access control measures	<input type="checkbox"/> 54. Maintenance of water control structures (dewatering units, spillways, levees)	<input type="checkbox"/> 82. Construction of dam/weirs/ levees
<input type="checkbox"/> 27. Restoration of sites following human use and abuse	<input type="checkbox"/> 55. Solar panels	<input type="checkbox"/> 83. Submarine pipeline, directional boring operations
<input type="checkbox"/> 28. Removal of debris (e.g., dump sites, hazardous material, unauthorized structures)	<input type="checkbox"/> 62. Blasting	<input type="checkbox"/> 86. Landfill construction
<input type="checkbox"/> 29. Acquisition and use of fill/borrow material	<input type="checkbox"/> 63. Foundation installation for transmission support	<input checked="" type="checkbox"/> 89. Structure demolition
<input type="checkbox"/> 31. Stream/wetland crossings	<input type="checkbox"/> 64. Installation of steel structure, overhead bus, equipment, etc.	<input type="checkbox"/> 91. Bridge replacement
<input type="checkbox"/> 32. Clean-up following storm damage	<input type="checkbox"/> 65. Pole and/or tower installation and/or extension	<input type="checkbox"/> 92. Return of archaeological remains to former burial sites
<input type="checkbox"/> 33. Removal of hazardous trees/tree branches		

STEP 3) Project includes one or more activities in Table 3?

YES (Go to Step 4)

NO (Go to Step 13)

STEP 4) Answer questions a through e below (applies to projects with activities from Table 3 ONLY)

- a) Will project involve continuous noise (i.e., ≥ 24 hrs) that is greater than 75 decibels measured on the A scale (e.g., loud machinery)? **NO** (NV2 does not apply) **YES** (NV2 applies, subject to records review)
- b) Will project involve entry into/survey of cave? **NO** (HP1/HP2 do not apply) **YES** (HP1/HP2 applies, subject to review of bat records)
- c) If conducting **prescribed burning (activity 23)**, estimated acreage: and timeframe(s) below; **N/A**

STATE	SWARMING	WINTER	NON-WINTER	PUP
GA, KY, TN	<input type="checkbox"/> Oct 15 - Nov 14	<input type="checkbox"/> Nov 15 - Mar 31	<input type="checkbox"/> Apr 1 - May 31, Aug 1 - Oct 14	<input type="checkbox"/> Jun 1 - Jul 31
VA	<input type="checkbox"/> Sep 16 - Nov 15	<input type="checkbox"/> Nov 16 - Apr 14	<input type="checkbox"/> Apr 15 - May 31, Aug 1 - Sept 15	<input type="checkbox"/> Jun 1 - Jul 31
AL	<input type="checkbox"/> Oct 15 - Nov 14	<input type="checkbox"/> Nov 15 - Mar 15	<input type="checkbox"/> Mar 16 - May 31, Aug 1 - Oct 14	<input type="checkbox"/> Jun 1 - Jul 31
NC	<input type="checkbox"/> Oct 15 - Nov 14	<input type="checkbox"/> Nov 15 - Apr 15	<input type="checkbox"/> Apr 16 - May 31, Aug 1 - Oct 14	<input type="checkbox"/> Jun 1 - Jul 31
MS	<input type="checkbox"/> Oct 1 - Nov 14	<input type="checkbox"/> Nov 15 - Apr 14	<input type="checkbox"/> Apr 15 - May 31, Aug 1 - Sept 30	<input type="checkbox"/> Jun 1 - Jul 31

- d) Will the project involve vegetation piling/burning? **NO** (SSPC4/SHF7/SHF8 do not apply) **YES** (SSPC4/SHF7/SHF8 applies, subject to review of bat records)

- e) If **tree removal (activity 33 or 34)**, estimated amount: **ac** **trees** **N/A**

STATE	SWARMING	WINTER	NON-WINTER	PUP
GA, KY, TN	<input type="checkbox"/> Oct 15 - Nov 14	<input type="checkbox"/> Nov 15 - Mar 31	<input type="checkbox"/> Apr 1 - May 31, Aug 1 - Oct 14	<input type="checkbox"/> Jun 1 - Jul 31
VA	<input type="checkbox"/> Sep 16 - Nov 15	<input type="checkbox"/> Nov 16 - Apr 14	<input type="checkbox"/> Apr 15 - May 31, Aug 1 - Sept 15	<input type="checkbox"/> Jun 1 - Jul 31
AL	<input type="checkbox"/> Oct 15 - Nov 14	<input type="checkbox"/> Nov 15 - Mar 15	<input type="checkbox"/> Mar 16 - May 31, Aug 1 - Oct 14	<input type="checkbox"/> Jun 1 - Jul 31
NC	<input type="checkbox"/> Oct 15 - Nov 14	<input type="checkbox"/> Nov 15 - Apr 15	<input type="checkbox"/> Apr 16 - May 31, Aug 1 - Oct 14	<input type="checkbox"/> Jun 1 - Jul 31
MS	<input type="checkbox"/> Oct 1 - Nov 14	<input type="checkbox"/> Nov 15 - Apr 14	<input type="checkbox"/> Apr 15 - May 31, Aug 1 - Sept 30	<input type="checkbox"/> Jun 1 - Jul 31

- If warranted, does project have flexibility for bat surveys (May 15-Aug 15): **MAYBE** **YES** **NO**

*** For **PROJECT LEADS** whose projects will be reviewed by a Heritage Reviewer (Natural Resources Organization only), **STOP HERE**. Click File/Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date", and submit with project information. Otherwise continue to Step 5. ***

SECTION 2: REVIEW OF BAT RECORDS (applies to projects with activities from Table 3 ONLY)

STEP 5) Review of bat/cave records conducted by Heritage/OSAR reviewer?

- YES** **NO** (Go to Step 13)

Info below completed by: **Heritage Reviewer** (name) Date

OSAR Reviewer (name) Date

Terrestrial Zoologist (name) Liz Hamrick Date Sep 1, 2023

- Gray bat records: None Within 3 miles* Within a cave* Within the County
- Indiana bat records: None Within 10 miles* Within a cave* Capture/roost tree* Within the County
- Northern long-eared bat records: None Within 5 miles* Within a cave* Capture/roost tree* Within the County
- Virginia big-eared bat records: None Within 6 miles* Within the County
- Caves: None within 3 mi Within 3 miles but > 0.5 mi Within 0.5 mi but > 0.25 mi* Within 0.25 mi but > 200 feet* Within 200 feet*

- Bat Habitat Inspection Sheet completed? **NO** **YES**

Amount of **SUITABLE** habitat to be removed/burned (may differ from STEP 4e): (**ac** **trees**)* **N/A**

STEP 6) Provide any additional notes resulting from Heritage Reviewer records review in Notes box below then
 **Go to Step 13**

Notes from Bat Records Review (e.g., historic record; bats not on landscape during action; DOT bridge survey with negative results):

STEPS 7-12 To be Completed by Terrestrial Zoologist (if warranted):

STEP 7) Project will involve:

- Removal of suitable trees within 0.5 mile of P1-P2 Indiana bat hibernacula or 0.25 mile of P3-P4 Indiana bat hibernacula or any NLEB hibernacula.
- Removal of suitable trees within 10 miles of documented Indiana bat (or within 5 miles of NLEB) hibernacula.
- Removal of suitable trees > 10 miles from documented Indiana bat (> 5 miles from NLEB) hibernacula.
- Removal of trees within 150 feet of a documented Indiana bat or northern long-eared bat maternity roost tree.
- Removal of suitable trees within 2.5 miles of Indiana bat roost trees or within 5 miles of Indiana bat capture sites.
- Removal of suitable trees > 2.5 miles from Indiana bat roost trees or > 5 miles from Indiana bat capture sites.
- Removal of documented Indiana bat or NLEB roost tree, if still suitable.
- N/A

STEP 8) Presence/absence surveys were/will be conducted: YES NO TBD

STEP 9) Presence/absence survey results, on NEGATIVE POSITIVE N/A

STEP 10) Project WILL WILL NOT require use of Incidental Take in the amount of acres or trees proposed to be used during the WINTER VOLANT SEASON NON-VOLANT SEASON N/A

STEP 11) Available Incidental Take (prior to accounting for this project) as of

TVA Action	Total 20-year	Winter	Volant Season	Non-Volant Season
3 Manage Land Use and Disposal of TVA-Retained Land				

STEP 12) Amount contributed to TVA's Bat Conservation Fund upon activity completion: \$ OR N/A

TERRESTRIAL ZOOLOGISTS, after completing SECTION 2, review Table 4, modify as needed, and then complete section for Terrestrial Zoologists at end of form.

SECTION 3: REQUIRED CONSERVATION MEASURES

STEP 13) Review Conservation Measures in Table 4 and ensure those selected are relevant to the project. If not, manually override and uncheck irrelevant measures, and explain why in ADDITIONAL NOTES below Table 4.

Did review of Table 4 result in ANY remaining Conservation Measures in **RED**?

- NO** (Go to Step 14)
- YES** (STOP HERE; Submit for Terrestrial Zoology Review. Click File/Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date", and submit with project information).

Table 4. TVA's ESA Section 7 Programmatic Bat Consultation Required Conservation Measures

The Conservation Measures in Table 4 are automatically selected based on your choices in Tables 2 and 3 but can be manually overridden, if necessary. To Manually override, press the button and enter your name.

Manual Override

Name: Elizabeth Hamrick

Check if Applies to Project	Activities Subject To Conservation Measure	Conservation Measure Description
		<p>NV1 - Noise will be short-term, transient, and not significantly different from urban interface or natural events (i.e., thunderstorms) that bats are frequently exposed to when present on the landscape.</p>
		<p>SHF2 - Site-specific conditions (e.g., acres burned, transport wind speed, mixing heights) will be considered to ensure smoke is limited and adequately dispersed away from caves so that smoke does not enter cave or cave-like structures.</p>
		<p>SHF4 - If burns need to be conducted during April and May, when there is some potential for bats to present on the landscape and more likely to enter torpor due to colder temperatures, burns will only be conducted if the air temperature is 55° or greater, and preferably 60° or greater.</p>
		<p>SHF7 - Burning will only occur if site specific conditions (e.g. acres burned, transport wind speed, mixing heights) can be modified to ensure that smoke is adequately dispersed away from caves or cave-like structures. This applies to prescribed burns and burn piles of woody vegetation.</p>
		<p>SHF8 - Brush piles will be burned a minimum of 0.25 mile from documented, known, or obvious caves or cave entrances and otherwise in the center of newly established ROW when proximity to caves on private land is unknown.</p>
		<p>SHF9 - A 0.25 mile buffer of undisturbed forest will be maintained around documented or known gray bat maternity and hibernation colony sites, documented or known Virginia big-eared bat maternity, bachelor, or winter colony sites, Indiana bat hibernation sites, and northern long-eared bat hibernation sites. Prohibited activities within this buffer include cutting of overstory vegetation, construction of roads, trails or wildlife openings, and prescribed burning. Exceptions may be made for maintenance of existing roads and existing ROW, or where it is determined that the activity is compatible with species conservation and recovery (e.g., removal of invasive species).</p>
		<p>TR1* - Removal of potentially suitable summer roosting habitat during time of potential occupancy has been quantified and minimized programmatically. TVA will track and document alignment of activities that include tree removal (i.e., hazard trees, mechanical vegetation removal) with the programmatic quantitative cumulative estimate of seasonal removal of potential summer roost trees for Indiana bat and northern long-eared bat. Project will therefore communicate completion of tree removal to appropriate TVA staff.</p>
		<p>TR2 - Removal of suitable summer roosting habitat within 0.5 mile of Priority 1/Priority 2 Indiana bat hibernacula, or 0.25 mile of Priority 3/Priority 4 Indiana bat hibernacula or any northern long-eared bat hibernacula will be prohibited, regardless of season, with very few exceptions (e.g., vegetation maintenance of TL ROW immediately adjacent to a known cave).</p>
		<p>TR3* - Removal of suitable summer roosting habitat within documented bat habitat (i.e., within 10 miles of documented Indiana bat hibernacula, within 5 miles of documented northern long-eared bat hibernacula, within 2.5 miles of documented Indiana bat summer roost trees, within 5 miles of Indiana bat capture sites, within 1 mile of documented northern long-eared bat summer roost trees, within 3 miles of northern long-eared bat capture sites) will be tracked, documented, and included in annual reporting. Project will therefore communicate completion of tree removal to appropriate TVA staff.</p>
		<p>TR4* - Removal of suitable summer roosting habitat within potential habitat for Indiana bat or northern long-eared bat will be tracked, documented, and included in annual reporting. Project will therefore communicate completion of tree removal to appropriate TVA staff.</p>

Project Review Form - TVA Bat Strategy (06/2019)

<p>TR5 - Removal of any trees within 150 feet of a documented Indiana bat or northern long-eared bat maternity summer roost tree during non-winter season, range- wide pup season or swarming season (if site is within known swarming habitat), will first require a site-specific review and assessment. If pups are present in trees to be removed (determined either by mist netting and assessment of adult females, or by visual assessment of trees following evening emergence counts), TVA will coordinate with the USFWS to determine how to minimize impacts to pups to the extent possible. May include establishment of artificial roosts before removal of roost tree(s).</p>
<p>TR6 - Removal of a documented Indiana bat or northern long-eared bat roost tree that is still suitable and that needs to occur during non-winter season, range-wide pup season, or swarming season (if site is within known swarming habitat) will first require a site-specific review and assessment. If pups are present in trees to be removed (determined either by mist netting and assessment of adult females, or by visual assessment of trees following evening emergence counts), TVA will coordinate with USFWS to determine how to minimize impacts to pups to the extent possible. This may include establishment of artificial roosts before removal of roost tree(s).</p>
<p>TR7 (Existing Transmission ROW only) - Tree removal within 100 feet of existing transmission ROWs will be limited to hazard trees. On or adjacent to TLs, a hazard tree is a tree that is tall enough to fall within an unsafe distance of TLs under maximum sag and blowout conditions and/or are also dead, diseased, dying, and/or leaning. Hazard tree removal includes removal of trees that 1) currently are tall enough to threaten the integrity of operation and maintenance of a TL or 2) have the ability in the future to threaten the integrity of operation and maintenance of a TL.</p>
<p>TR8 (TVA Reservoir Land only) - Requests for removal of hazard trees on or adjacent to TVA reservoir land will be inspected by staff knowledgeable in identifying hazard trees per International Society of Arboriculture and TVA's checklist for hazard trees. Approval will be limited to trees with a defined target.</p>
<p>TR9 - If removal of suitable summer roosting habitat occurs when bats are present on the landscape, a funding contribution (based on amount of habitat removed) towards future conservation and recovery efforts for federally listed bats would be carried out. Project can consider seasonal bat presence/absence surveys (mist netting or emergence counts) that allow for positive detections without resulting in increased constraints in cost and project schedule. This will enable TVA to contribute to increased knowledge of bat presence on the landscape while carrying out TVA's broad mission and responsibilities.</p>

Project Review Form - TVA Bat Strategy (06/2019)

<p>AR1 - Projects that involve structural modification or demolition of buildings, bridges, and potentially suitable box culverts, will require assessment to determine if structure has characteristics that make it a potentially suitable unconventional bat roost. If so a survey to determine if bats may be present will be conducted. Structural assessment will include:</p> <ul style="list-style-type: none">○ Visual check that includes an exhaustive internal/external inspection of building to look for evidence of bats (e.g., bat droppings, roost entrance/exit holes); this can be done at any time of year, preferably when bats are active.○ Where accessible and health and safety considerations allow, a survey of roof space for evidence of bats (e.g., droppings, scratch marks, staining, sightings), noting relevant characteristics of internal features that provide potential access points and roosting opportunities. Suitable characteristic may include: gaps between tiles and roof lining, access points via eaves, gaps between timbers or around mortise joints, gaps around top and gable end walls, gaps within roof walling or around tops of chimney breasts, and clean ridge beams.○ Features with high-medium likelihood of harboring bats but cannot be checked visually include soffits, cavity walls, space between roof covering and roof lining.○ Applies to box culverts that are at least 5 feet (1.5 meters) tall and with one or more of the following characteristics. Suitable culverts for bat day roosts have the following characteristics:<ul style="list-style-type: none">● Location in relatively warm areas● Between 5-10 feet (1.5-3 meters) tall and 300 ft (100 m) or more long● Openings protected from high winds● Not susceptible to flooding● Inner areas relatively dark with roughened walls or ceilings● Crevices, imperfections, or swallow nests○ Bridge survey protocols will be adapted from the Programmatic Biological Opinion for the Federal Highway Administration (Appendix D of USFWS 2016c, which includes a Bridge Structure Assessment Guidance and a Bridge Structure Assessment Form).○ Bat surveys usually are NOT needed in the following circumstances:<ul style="list-style-type: none">● Domestic garages /sheds with no enclosed roof space (with no ceiling)● Modern flat-roofed buildings● Metal framed and roofed buildings● Buildings where roof space is regularly used (e.g., attic space converted to living space, living space open to rafters) or where all roof space is lit from skylights or windows. Large/tall roof spaces may be dark enough at apex to provide roost space
<p>AR2 - Additional bat P/A surveys (e.g., emergence counts) conducted if warranted (i.e., when AR1 indicates that bats may be present).</p>
<p>AR4 - Removal of buildings with suitable roost characteristics within six miles of known or presumed occupied roosts for Virginia big-eared bat would occur between Nov 16 and Mar 31. Buildings may be removed other times of the year once a bat biologist evaluates a buildings' potential to serve as roosting habitat and determines that this species is not present and/or is not using structure(s).</p>

SSPC1 (Transmission only) - Transmission actions and activities will continue to Implement A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Construction and Maintenance Activities. This focuses on control of sediment and pollutants, including herbicides. Following are key measures:

- BMPs minimize erosion and prevent/control water pollution in accordance with state-specific construction storm water permits. BMPs are designed to keep soil in place and aid in reducing risk of other pollutants reaching surface waters, wetlands and ground water. BMPs will undertake the following principles:
 - Plan clearing, grading, and construction to minimize area and duration of soil exposure.
 - Maintain existing vegetation wherever and whenever possible.
 - Minimize disturbance of natural contours and drains.
 - As much as practicable, operate on dry soils when they are least susceptible to structural damage and erosion.
 - Limit vehicular and equipment traffic in disturbed areas. Keep equipment paths dispersed or designate single traffic flow paths with appropriate road BMPs to manage runoff.
 - Divert runoff away from disturbed areas.
 - Provide for dispersal of surface flow that carries sediment into undisturbed surface zones with high infiltration capacity and ground cover conditions.
 - Prepare drainage ways and outlets to handle concentrated/increased runoff.
 - Minimize length and steepness of slopes. Interrupt long slopes frequently.
 - Keep runoff velocities low and/or check flows.
 - Trap sediment on-site.
 - Inspect/maintain control measures regularly & after significant rain.
 - Re-vegetate and mulch disturbed areas as soon as practical.
- Specific guidelines regarding sensitive resources and buffer zones:
 - Extra precaution (wider buffers) within SMZs is taken to protect stream banks and water quality for streams, springs, sinkholes, and surrounding habitat.
 - BMPs are implemented to protect and enhance wetlands. Select use of equipment and seasonal clearing is conducted when needed for rare plants; construction activities are restricted in areas with identified rare plants.
 - Standard requirements exist to avoid adverse impacts to caves, protected animals, unique/important habitat (e.g., cave buffers, restricted herbicide use, seasonal clearing of suitable habitat).

SSPC2 - Operations involving chemical/fuel storage or resupply and vehicle servicing will be handled outside of riparian zones (streamside management zones) in a manner to prevent these items from reaching a watercourse. Earthen berms or other effective means are installed to protect stream channel from direct surface runoff. Servicing will be done with care to avoid leakage, spillage, and subsequent stream, wetland, or ground water contamination. Oil waste, filters, other litter will be collected and disposed of properly. Equipment servicing and chemical/fuel storage will be limited to locations greater than 300-ft from sinkholes, fissures, or areas draining into known sinkholes, fissures, or other karst features.

SSPC3 (Power Plants only) - Power Plant actions and activities will continue to implement standard environmental practices. These include:

- Best Management Practices (BMPs) in accordance with regulations:
 - Ensure proper disposal of waste, ex: used rags, used oil, empty containers, general trash, dependent on plant policy
 - Maintain every site with well-equipped spill response kits, included in some heavy equipment
 - Conduct Quarterly Internal Environmental Field Assessments at each sight
 - Every project must have an approved work package that contains an environmental checklist that is approved by sight Environmental Health & Safety consultant.
 - When refueling, vehicle is positioned as close to pump as possible to prevent drips, and overfilling of tank. Hose and nozzle are held in a vertical position to prevent spillage
- Construction Site Protection Methods
 - Sediment basin for runoff - used to trap sediments and temporarily detain runoff on larger construction sites
 - Storm drain protection device
 - Check dam to help slow down silt flow
 - Silt fencing to reduce sediment movement
- Storm Water Pollution Prevention (SWPP) Pollution Control Strategies
 - Minimize storm water contact with disturbed soils at construction site
 - Protect disturbed soil areas from erosion
 - Minimize sediment in storm water before discharge
 - Prevent storm water contact with other pollutants
 - Construction sites also may be required to have a storm water permit, depending on size of land disturbance (>1ac)
- Every site has a Spill Prevention and Control Countermeasures (SPCC) Plan and requires training. Several hundred pieces of equipment often managed at the same time on power generation properties. Goal is to
 - Minimize fuel and chemical use Ensure proper disposal of waste, ex: used rags, used oil, empty containers, general trash, dependent on plant policy
 - Maintain every site with well-equipped spill response kits, included in some heavy equipment
 - Conduct Quarterly Internal Environmental Field Assessments at each sight
 - Every project must have an approved work package that contains an environmental checklist that is approved by sight Environmental Health & Safety consultant.
 - When refueling, vehicle is positioned as close to pump as possible to prevent drips, and overfilling of tank. Hose and nozzle are held in a vertical position to prevent spillage
- Construction Site Protection Methods
 - Sediment basin for runoff - used to trap sediments and temporarily detain runoff on larger construction sites
 - Storm drain protection device
 - Check dam to help slow down silt flow
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 - Minimize storm water contact with disturbed soils at construction site
 - Protect disturbed soil areas from erosion
 - Minimize sediment in storm water before discharge
 - Prevent storm water contact with other pollutants
 - Construction sites also may be required to have a storm water permit, depending on size of land disturbance (>1ac)
- Every site has a Spill Prevention and Control Countermeasures (SPCC) Plan and requires training. Several hundred pieces of equipment often managed at the same time on power generation properties. Goal is to minimize fuel and chemical use

SSPC4 (Transmission only) - Woody vegetation burn piles associated with transmission construction will be placed in the center of newly established ROWs to minimize wash into any nearby undocumented caves that might be on adjacent private property and thus outside the scope of field survey for confirmation. Brush piles will be burned a **minimum of 0.25 miles from documented caves** and otherwise in the center of newly established ROW when proximity to caves on private land is unknown.

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<p>SSPC5 (26a, Solar, Economic Development only) - Section 26a permits and contracts associated with solar projects, economic development projects or land use projects include standards and conditions that include standard BMPs for sediment and contaminants as well as measures to avoid or minimize impacts to sensitive species or other resources consistent with applicable laws and Executive Orders.</p>
<p>SSPC6 - Herbicide use will be avoided within 200 ft of portals associated with caves, cave collapse areas, mines and sinkholes are capable of supporting cave-associated species. Herbicides are not applied to surface water or wetlands unless specifically labeled for aquatic use. Filter and buffer strips will conform at least to federal and state regulations and label requirements.</p>
<p>SSPC7 - Clearing of vegetation within a 200-ft radius of documented caves will be limited to hand or small machinery clearing only (e.g., chainsaws, bush-hog, mowers). This will protect potential recharge areas of cave streams and other karst features that are connected hydrologically to caves.</p>
<p>L1 - Direct temporary lighting away from suitable habitat during the active season.</p>
<p>L2 - Evaluate the use of outdoor lighting during the active season and seek to minimize light pollution when installing new or replacing existing permanent lights by angling lights downward or via other light minimization measures (e.g., dimming, directed lighting, motion-sensitive lighting).</p>

¹Bats addressed in consultation (02/2018), which includes gray bat (listed in 1976), Indiana bat (listed in 1967), northern long-eared bat (listed in 2015), and Virginia big-eared bat (listed in 1979).

Hide All Unchecked Conservation Measures

- HIDE
- UNHIDE

Hide Table 4 Columns 1 and 2 to Facilitate Clean Copy and Paste

- HIDE
- UNHIDE

NOTES (additional info from field review, explanation of no impact or removal of conservation measures).

STEP 14) Save completed form (Click File/Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date") in project environmental documentation (e.g. CEC, Appendix to EA) AND send a copy of form to batstrategy@tva.gov
Submission of this form indicates that Project Lead/Applicant:

(name) is (or will be made) aware of the requirements below.

- Implementation of conservation measures identified in Table 4 is required to comply with TVA's Endangered Species Act programmatic bat consultation.
- TVA may conduct post-project monitoring to determine if conservation measures were effective in minimizing or avoiding impacts to federally listed bats.

For Use by Terrestrial Zoologist Only

Terrestrial Zoologist acknowledges that Project Lead/Contact (name) has been informed of any relevant conservation measures and/or provided a copy of this form.

For projects that require use of Take and/or contribution to TVA's Bat Conservation Fund, Terrestrial Zoologist acknowledges that Project Lead/Contact has been informed that project will result in use of Incidental Take ac trees and that use of Take will require \$ contribution to TVA's Conservation Fund upon completion of activity (amount entered should be \$0 if cleared in winter).

For Terrestrial Zoology Use Only. Finalize and Print to Noneditable PDF.

APPENDIX C – RESPONSE TO PUBLIC COMMENTS

A draft of this environmental assessment (EA) was released for public comment on March 12, 2024. The comment period was initiated with a notification and request for comments in the Chattanooga Times-Free Press on March 10, 2024, and the comment period closed on April 11, 2024. The draft EA was transmitted to state, federal, and local agencies and federally recognized tribes. It was also posted on TVA's public NEPA review website. TVA accepted comments through an electronic comment form on the project website and by email, in addition to written comments submitted at the public meeting.

TVA received a total of 132 comments during the 30-day comment period. One additional comment was received the comment period closed. About 67 percent included suggestions for future use, which is beyond the scope of the EA. The majority (85 percent) of comments were submitted through the website form; 12 percent submitted via email; and 3 percent in person at the public meeting. A small number of comments (3 percent) did not indicate support for an alternative but noted concerns for effects of the alternatives or specific comments on the EA. Two comments were out of scope and are not discussed further in this report.

Of the comments referencing an action or alternative:

- About 10 percent supported Alternative 1 (no action);
- About 34 percent indicated support for Alternative 2 (demolish the buildings and dispose of the land);
- About 30 percent indicated support for Alternative 3 (dispose of buildings and land) or repurposing the existing buildings;
- About 16 percent indicated support for Alternative 4 or one of the Alternative 4 options (renovate some buildings and dispose of others);
- About 10 percent indicated opposition to demolishing the buildings (Alternative 2) but did not indicate support for another alternative.

TVA carefully reviewed all comments received and has responded to those comments in the following table.

Comment	Response	Commentor Name	Commentor Affiliation
<p>I think this should be used an event space. The convention center being "the only game in town" as far as large event venues has led to a lot of issues for those of us as event planners who feel pressured and bullied by their way of doing business. the TVA space would be an AWESOME large scale event venue.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Alexis Bakjian</p>	
<p>I think it would be best used as a campus - trade school, public school, magnet school, college. It already has the setting. Multi-use office building, possibly such as the Edney/Society of work buildings as I know both of those are on a wait list for people to occupy both in office and apartment use. Add in some businesses and places to eat and it would be a perfect closed loop facility.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Alexis Hughes</p>	
<p>The building would be a wonderful place to have an orphanage. It already has security, cafeteria, classrooms etc. It would benefit the entire Tennessee Valley region and give back to the community via economic investments. We do not have anything like it and it would be an amazing opportunity to better the lives of children in the area.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Alison Dugas</p>	
<p>I agree that the office complex must be altered to reflect the progression of workplace culture. The best proposal for my vision is 4(b) because it limits the mechanical demolition downtime imposed onto neighboring properties' residents/employees, in addition to optimizing the return value for both TVA and Chattanooga. As long as the community is prioritized in terms of traffic, noise, obstruction, and personal (or collective) benefit, I will likely approve of the TVA's decision.</p>	<p>Your support for Alternative 4b has been received and recorded. The selected alternative will follow best management practices (BMPs) and mitigation measures (Section 2.3 of the Environmental Assessment). Thank you for your review and your time.</p>	<p>Alix Thornhill</p>	<p>Deputy Campaign Manager, Jack Allen for Congress</p>
<p>Thank you for inviting public comments regarding the proposed TVA Chattanooga office complex renovation. I am writing to express my support for Alternative 4, giving preference to those sub-options that limit demolition of existing structures and conveyance of unused buildings to other entities.</p> <p>I can think of several ways the TVA buildings can be re-purposed to suit our community's needs. Because of their position in the heart of downtown, I think that they would be ideally situated for the creation of additional housing, retail, and small business spaces.</p> <p>Idea 1: Convert buildings to accommodate additional housing, small businesses, office space, and retail space. Similar to what currently exists at Warehouse Row, the TVA buildings could be converted into apartments, office and retail space, and co-working spaces that could attract visitors and increase foot traffic in an otherwise quiet stretch of downtown. Because of the need for additional housing in Chattanooga and the growing popularity of the Southside, the location of the TVA complex is ideally suited for this kind of project.</p> <p>Idea 2: Convert buildings to accommodate the above-stated spaces, with additional housing exclusively for UTC students. The housing shortage in Chattanooga is affecting UTC students, with housing near campus becoming more expensive and less accessible for undergraduate and graduate students. Perhaps a partnership with UTC could occur to renovate one structure for student housing.</p> <p>Though I am not an expert in city planning, I think that these ideas could benefit the entire Chattanooga community. Additional housing is greatly needed, and real estate downtown remains limited. Because of the TVA office complex's proximity to UTC, the Southside, and the Riverfront, this provides a great opportunity to drive growth downtown.</p> <p>I'd be happy to discuss my ideas with you all should you have questions. Thank you again for giving the public this opportunity.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 4 (renovate some buildings and dispose of others) has been recorded. Thank you for your review and your time.</p>	<p>Allison McIndoo</p>	
<p>Tear it down. Build a large municipal arena for events like concerts, shows, professional hockey, etc.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support</p>	<p>Amy</p>	

Comment	Response	Commentor Name	Commentor Affiliation
	for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.		
Love the architectural features and the fact that it was environmentally progressive for it's time. Please reuse/repurpose the building!	Your comment has been noted and will be taken into consideration. We appreciate your review and your time.	Angela Smith	
Alternative 2. Demolish the building	Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.	Anna Bode	
Seeing as the state of Tennessee has made homelessness illegal, I believe the building would be best served by turning it into apartments for the homeless to get them back on their feet and to provide them with opportunities to seek employment, health resources and whatever else they may need.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	April	
Turn it in to the new Federal Courthouse.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Arch Trimble	
<p>TVA has a responsibility to ensure that the future state of the downtown Chattanooga TVA property aligns as closely as possible to the highest and best use case for the land in order to serve the people of the city and surrounding areas.</p> <p>Given the size and location of the complex, this, in my opinion takes shape as a transfer to private development. However, I am not suggesting that the complex be sold to a single or even a few of the established developers. This would be a discouraging case of a continued monopoly for land ownership in Chattanooga. Just as TVA was formed in 1933 to at a basic level, serve the people of the Tennessee Valley, this historic event (the complex transition) needs to at its core, serve the people of the Tennessee Valley. Innovation, growth, preservation, wealth creation, job creation all need to be markers by which this complex is transferred and renewed. Support small businesses and locals by structuring this transfer that provides opportunity to newer generations to make Chattanooga a better place to live, work and play.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Banning Stack	
<p>I'd like to see County government offices consolidated into a single location, and the TVA site would be perfect! Depending on the size, it might also be possible to combine City of Chattanooga and Hamilton County offices into a single, one-stop shop. Such a combination could help contain the cost of some repetitive costs and employee benefits--conference rooms; security; employee gym, medical and dental clinic, and pharmacy; parking for employees and visitors (which should be free!); onsite childcare center (if the City and County don't offer this, they need to!); cafeteria; etc.</p> <p>It's high time local govt provides meaningful services to citizens with some conveniences like one-stop access, but also treats employees well. After all, govt employees are voters, too, and local govt sets the tone for local business. If we want local businesses to treat employees well, we should start with local govt employees being treated well!</p> <p>Finally, a complex that large could provide for some public use too, ie, conference rooms and similar facilities could be made available for public use for a small fee. A childcare center could be open to all downtown workers, etc. And a one-stop location would make it much easier to pay parking fines, taxes, attend public meetings, etc.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Belva Lockwood	
Make a music venue out of it but keep the office esthetic!	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Ben	

Comment	Response	Commentor Name	Commentor Affiliation
I would prefer to see TVA maintain and use the property as my first choice. As a second choice, I would prefer to see TVA tear it down and sell the land.	Your support for Alternative 1 (no action) with a second choice of Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.	Ben Francis	
TVA should demolish and sell the Chattanooga Office Complex. It is an eyesore as well as a physical barrier between downtown and the South Broad / Lookout Mountain area of Chattanooga. Letting someone else develop the land would lead to a more cohesive city layout running from Signal Mountain all the way to Lookout Mountain.	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	Benjamin Bode	
<p>Thank you for taking the time to allow the public to share their opinions on your current office site. I would personally love to see an indoor sports complex be built downtown with an attached hotel and tons of meeting space. This region extremely lacks any indoor sports complex and is much needed in our community. From Athens, TN down to Ringgold, GA, there isn't a single indoor sports complex. If the city of Chattanooga would operate it, they could have programming throughout the week and then Chattanooga Tourism/Chattanooga Sports could sell our destination and fill up the complex each weekend of the year by using their contacts/relationships to bring more tournaments into town. Tax revenue generated would payoff the complex over time and then additional revenue could help renovate the library into a state of the art building. More tax revenue could easily repave all the streets downtown and perhaps expand Miller Park to a larger outdoor venue.</p> <p>I say all that to say, TVA should either sell the land to the city of Chattanooga (or Hamilton County) or demolish it and hire a third party company to run an indoor complex. I believe that to be a win win for everyone while also enhancing the quality of life for people in our community.</p>	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) or Alternative 3 (dispose of buildings and land) has been recorded. Thank you for your review and your time.	Brant Donlon	
As a previous TVA employee, I vote: Alternative 2 – Demolish Buildings and Convey Land	Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.	Bre George	
I have found TVA to be a typical government organization. Totally inefficient in serving their supposedly designed purpose. Are neighborhood has direct contact with TVA property and have tried to deal with them several times about cleaning up the property and they are totally evasive and uncooperative. They are typical government organization which has numerous areas and committees to deal with issues which never get any attention. They're great at holding meetings and designing plans that never get accomplished. Their standards of operations are beneath anything the private sector would tolerate. You will do what you want to with the building. This public opinion survey is nothing but a sham. You could care less what the public wants as you are not accountable to the public. Donald Trump had it on spot when he wanted to cut the enormous salary of the head of the TVA. Hopefully they will pass the law where all of your ridiculous salaries are exposed and we can get rid of most of you. My Hope Is that you will find work in the private sector at much less compensation. More closely to what you're worth.	We appreciate your review and your time.	Brian Buxton	
We have enough apartments so unless these buildings will be specifically remodeled to house the unhoused then it doesn't need to be living spaces. I would love to see a natural history museum and learning center with an indoor picnic/play center and indoor garden or hydroponic system. This would not only enrich the local community but also drive tourism and further brand us as a great city to bring your family.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Brooke Payne	

Comment	Response	Commentor Name	Commentor Affiliation
<p>First, I'd like to say that I think it's great that the company is getting input from the community. Personally, I prefer the route of choosing the most environmentally-friendly option. My guess is that the best option for the environment is to use what we already have and keep the building. I would love to see this used for the community. Whether that's transitioning into a school, adding housing, or creating a public space for events, I think the community should be at the heart of the decision. I would love to see some of the property used for a public garden. This would be something everyone could enjoy, and perhaps there could even be a community vegetable garden of some sort.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Callie Coplen</p>	
<p>Affordable housing has been mentioned as a consideration for TVA's renovation. Please give consideration to the development of a retirement community (condominiums) with a mixed use complex with areas for individuals wanting to downsize their homes with new ones to enable them to "age in place". You could build a SAFE "15-minute city" for active senior citizens that could further cement Chattanooga's reputation as a best place to retirees to locate and set a new standard for the rest of the country. The TVA complex could provide protected and safe parking, workout areas and safe meeting places. The area already has nice restaurants, plenty of entertainment venues, a library, and a new grocery store soon to open. Single level homes and condominiums aren't being built in Chattanooga for seniors wanting to sell their homes and downsize. We have lots of multi-level townhomes with stairs. Those with elevators start at \$1M. I am well educated and past retirement age but still work because I enjoy it but am looking at retirement in the future. I appreciate your consideration.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Carol Adams</p>	
<p>The TVA building centered in downtown Chattanooga has been a part of my life since I was a child. I marveled at the architecture and strength it seemed to present. The entire building is a beast, but its beauty needs to be maintained to at least some capacity. Personally, I would like for the entire structure to stay the way it has been. However, I am very much aware of the housing crisis of my fellow Chattanoogaans. With that being said, I would love for a combined project to transform parts of the building into affordable housing and the rest can be renovated for TVA use.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Chandler Tate Smith</p>	
<p>TVA's Chattanooga building is one of the most beautiful non-functional pieces of architecture the organization has to offer. Demolishing this building would prevent TVA from the following opportunities: A place for encouraging STEM and trades to the youth throughout Tennessee: —A home for all TVA history and retired equipment. A showcase of the volunteer state's much overlooked contribution to engineering, outside of war. —A possible home for engineering expos and conventions. "Gig-City" is one of the best spots for logistics for many transportation companies. Many of these companies have trucks that cross over TVA infrastructure every day. —Award shows for engineering, creativity, and design for Tennessean high schoolers. Tickets can supply scholarships.</p> <p>Tennessee's infrastructure is only going to fall more behind if we do not encourage a new generation to dedicate their lives to such difficult projects. If we do not teach our youth any differently, the TVA building, a symbol of pioneer engineers from the volunteer state, will become yet another parking lot. Just like the rest of Tennessee.</p>	<p>TVA cannot reasonably foresee how the COC or land would be used after disposal under the proposed action alternatives; however, your input has been received and recorded. We appreciate your review and your time.</p>	<p>Charles C.</p>	
<p>Apartments/housing for homeless Veterans!</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Charlye Daughtrey</p>	

Comment	Response	Commentor Name	Commentor Affiliation
<p>Thank you for the opportunity to provide my comment concerning the TVA complex's future in downtown Chattanooga, Tennessee.</p> <p>As a person from Chattanooga, I believe the highest and best use of the complex and its land is to sell it to an organization or company that can utilize it to enhance Chattanooga's growing tourism and meeting market. It is likely that the subject property could accommodate a large hotel complex, expanded convention center and on-site parking.</p> <p>Also, there appears to be ample commercial space available that TVA could occupy or build in or very near downtown Chattanooga that would accommodate its current and projected future workforce and business-function needs.</p> <p>TVA is a valued Chattanooga business and community partner, and a valued and needed powerhouse for positive change.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Chris Allen	
<p>I believe that this site should be the site of the new federal court house that has been approved to be replaced here in Chattanooga. This it would make it easier to have the property stay under tva property holding without private investors using said fact for tax incentives. Also it would potentially ease the cost burden of the new federal court house and allow for office space for various support agencies be able to reside making it easier for citizens to proceed though the federal court system. Instead as it sits a few federal agencies in Chattanooga such as the FBI regional office lease space from investors groups that has seemed to open these agencies up to being bias or even protecting public corruption. Converting the space or even replacing it with another federal structure seems more sound then having the property be auctioned by a company named compass in Hamilton County that deals with property sales and aids in insider trading and or the passing off of condemned city and county properties to select investors. And if this property falls I. The hand of rivercity company then trst assured public corruption would be involved due to thos group ac6ing as if they are a branch of Chattanooga's government.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Christopher T. Dahl	
<p>As office to residential conversation is unlikely, given the age and structures, I support Option B (demo buildings and dispose of land). Ideally, the City of Chattanooga and federally recognized tribes should have first right of refusal on this land, for the purpose of community-led development that addresses the housing and community needs of the residents of Chattanooga and Hamilton County.</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	Colby Sledge	
<p>Of the options given I vote for TVA to retain and continue to utilize the building they have. As a rate payer I think this is the most fiscally responsible option. Building codes and material costs mean a new facility would be expensive. The current facility is a relatively young building.</p>	<p>Your support for Alternative 1 (no action) has been noted. Thank you for your review and your time.</p>	Courtney Rutherford	
<p>Crap Building! Demolish it. Sell land. Let someone build beautiful new icon 20-35 stories skyscrapers on it. No "5 floor" project. This is downtown. The last skyscraper was 1970/80's. Not counting the hostels.</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	Daniel S. Andrews	
<p>I feel the following regarding the downtown TVA building complex: B) demolish buildings and dispose of the land</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	Danielle Nelson	
<p>I think TVA should use whatever space it needs in the current complex and either rent or sell the other buildings to companies that would like to be located in downtown.</p>	<p>Your support for Alternative 4 (renovate some buildings and dispose of the others) has been noted. We appreciate your review and your time.</p>	Danny Spencer	

Comment	Response	Commentor Name	Commentor Affiliation
<p>I've lived in Chattanooga for 3 years now, but have been visiting 6-7 times a year since I was 7 years old, there is no other building (maybe except those ugly concrete towers downtown) downtown that I've wanted to see gone than the TVA building. No hate. It takes up three blocks, is an eye-sore of 80s hostile architecture, and basically is a barrier between southside and downtown. There are so many beautiful things that can be added to facilitate the land there.</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	<p>David Calhoun</p>	
<p>In the event of sale and/or demolish, what happens to workforce. My mom has been an custodial employee since before i was a kid, and I'm now 40, TVA is all she knows, i would hope all employees get ample heads ups before any decisions.</p>	<p>TVA considers the social and economic effects of each proposed action when determining the decision. Please see Section 3.9 in the Environmental Assessment. Thank you for your review and comment.</p>	<p>David D Thompson</p>	
<p>My name is David Duncan. I reside in Chattanooga TN. I live off of Gunbarrel road with an old friend of mine while I attend school at Chattanooga state.</p> <p>I thought I might chime in on the thought of what to do with the TVA building. I believe there has been quite the growth in Chattanooga and surrounding areas, downtown especially where many apartment homes are being developed, but with the housing market where it is today, the average cost of living in a safe living environment seems to almost be out of reach for a single family income... I think it would be an excellent idea to turn the structure into an apartment type dwelling, some stipulations as to make the tenants or guests feel safe in their homes. I'd love for us to share ideas or thoughts on this possible opportunity/project. Thanks for taking your time to read my email and giving a consideration to the possibilities of renovation...</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>David Duncan</p>	
<p>I'd like to see the TVA offices turned into something else other than office space. I'd say demolition and selling the land is the best option for the city.</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	<p>Davis Woody</p>	
<p>As a 2011 retiree of TVA, I worked in those buildings for 25 years. I think it would be a total waste to demolish the buildings and dispose of them and the land.</p> <p>My vote would be either no action or partial retention and renovation. The buildings are well designed and easily transformed into different types of space to accommodate today's hybrid workforce. Even when I worked there a portion of the building space was leased to other companies after large TVA layoffs changed the need for as much space. They were built to be energy efficient and use solar energy. I'm sure there are technology improvements needed as is always the case as technology changes. That is never ending and should not force a tear down of the structures.</p> <p>It seems a waste of TVA money and resources to do anything other than to keep at least part of the facilities and use them.</p>	<p>Your support for Alternative 1 (no action) or Alternative 4 (renovate some buildings and dispose of the others) has been noted. Thank you for your review and your time.</p>	<p>Deborah Anderson</p>	
<p>Please preserve the unique complex known as TVA in downtown Chattanooga. It is perfect for housing both low and high income residents in the city. Save the amphitheater and park-like areas for use by the tenants. All new housing in Chattanooga looks like cookie-cutter gray, black and white shipping containers stacked up together. This building is much more interesting and sturdy. Destruction is sad, repurposing is smart! Thank you - D.C. Lewis</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Delilah C Lewis</p>	
<p>I support Alternative 4(b) – Retrofit and modernize Monteagle Place, Signal Place, and Lookout Place. Any retrofit would need to include the construction of necessary underlying infrastructure. If this option were exercised, TVA would convey the remaining buildings through the means described in Alternative 2 and/or 3. Once the space is retrofitted, I would like to see the return of TVA workers downtown. The space leftover from the other TVA buildings demolition could be used for the new federal courthouse.</p>	<p>Your support for Alternative 4b has been received and recorded. Thank you for your review and your time.</p>	<p>Derrick Painter</p>	

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<p>This building would be for housing the veterans who are low income, for housing the ones who have no family and are disabled. Please consider this, we have so many that don't a home .</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Donna Hannah</p>	
<p>Affordable, tiny apartments. There is an immense shortage of affordable housing in Chattanooga, and it's only getting worse.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Drew</p>	
<p>For goodness sakes. Anyone around in the late 70's to early 80's and watched with both amazement and pride that such an impressive and well thought out building might be built and razed within their lifetime would be insulted at the notion. Perhaps we need the visionaries originally trusted for concept, design and construction to lead the process of what to do now. Apparently, we lack the skills most needed to usher this substantial asset into a forward-thinking plan. It leaves me wondering if forty years from now Chattanooga will be replacing what will be described as an unnecessary Federal Court house.</p>	<p>Your project input has been received and recorded. We appreciate your review and your time.</p>	<p>Edward Putnam</p>	
<p>With the amount of space and offices in this building, there would be an ample amount of space for housing. Chattanooga's homeless and low-income population has been increasing in recent years and converting a premade space would save money on all sides, increase employment due to a requirement for work being a current residence, which would boost the city's economy.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Elizabeth</p>	
<p>The purpose of this letter is to convey Chattanooga Design Studio's recommendations for any potential future consideration of the TVA site. Chattanooga Design Studio is an award-winning urban design focused non-profit with deep local connections and operations within downtown Chattanooga. As we have conveyed previously, the "Tennessee Valley Authority (TVA) Site" is the ideal site for the location of a new Federal Courthouse for three reasons: greater accessibility, civic presence, and catalytic economic investment that is far superior to the other two sites. We intend to lead a planning and urban design process over the next six months in partnership with a national level architecture and urban design firm. This process has been funded wholly by two large local foundations with support and significant interest from local organizations. It is our hope that this impending process would help the GSA explore options for location and urban design principles that could inform the Courthouse's design and ultimate siting.</p> <p>We are conveying these recommendations in the form of urban design diagrams that outline the potential for each unique block to offer civic structure to the district. These diagrams intend to begin to recognize street patterns, civic block structure and potential district vistas that could reinforce a future courthouse square. These prominent vistas provide the opportunity for the future courthouse block to serve as a focal point as a civic and cultural heart of the city. In addition, the remaining blocks should offer the ability for a premier address for significant new development.</p> <p>We appreciate all that GSA is doing and hope that these considerations will strongly factor into the design for a new Federal Courthouse in Chattanooga. We are happy to discuss this further and be a resource to you and your team as the process continues.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Eric Myers and Sydney Smith</p>	<p>Chattanooga Design Studio</p>

Comment	Response	Commentor Name	Commentor Affiliation
<p>As a homeowner, I abide by a budget to only buy things I can afford. How about instead of moving your office to the unincorporated area of Georgetown, you use what you already have. QUIT CLAIMING EMINENT DOMAIN. You have more than once stolen my family's property under this false claim. Please make do with what you have, as we all should. Most of your workers have the ability to work from home. There is no need to invade Georgetown other than to try to validate your false claims of eminent domain. SOME OF US STILL REMEMBER.</p> <p>My solution-oriented advice is to use what you already have. If that has become unaffordable or financially inefficient, incorporate an alternating work from home model.</p>	<p>Acquisition of land is not proposed for any of the action alternatives. We appreciate your review and your time.</p>	<p>Faith Quinn</p>	
<p>Turn the building into Housing units. Chattanooga needs that building for veterans and retired people at an affordable price.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Fantasy Johnson</p>	
<p>Selling the building is the best option. TVA should've learned from the trial and error of trying to renovate the Knoxville office complex. The KOC is way over what Mike Scaggs thought he could renovate them for and the renovation is still going on with lack luster management and subpar contractors, in some instances. Paying two to three times to get something done should not be allowed. Sell the COC, save money, build smaller because TVA thinks they need to renovate every time they buy something used.</p>	<p>Your support for Alternative 3 (dispose of buildings and land) has been noted. Thank you for your review and your time.</p>	<p>Fate Evans</p>	
<p>Advertise the building to New York and California companies looking to relocate!</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Glenn DeLashmitt</p>	
<p>Please do not demolish this building, it is a beautiful and unique piece of architecture.</p>	<p>Your project input has been received and recorded. We appreciate your review and your time.</p>	<p>Grant Lawson</p>	
<p>If TVA no longer needs the building, they should maximize the benefit to ratepayers by selling the property. The ratepayers paid the lease on the complex for decades. Then the ratepayers paid for TVA to buy the complex. Then ratepayers paid for the massive, multi-year renovation of all the COC building that was just completed a few years ago.</p> <p>Please do whatever creates the most value for the rate-payers. Thank you.</p>	<p>The economic impact analysis includes the estimated costs, and these would be considered in TVA's decision. Please see Section 3.9 in the Environmental Assessment. Thank you for your review and comment.</p>	<p>Greg Lewis</p>	
<p>Please tear all of the TVA buildings down and sell them off. I was just at Goodmans coffee shop at Warehouse Row yesterday and was staring directly at one of the monstrous, hideous TVA buildings downtown and thinking to myself, "I've hardly ever seen anyone go in or out of those" and "Why are those buildings still even there?"</p> <p>Downtown is an area that still needs a lot of development and revitalization if Chattanooga is going to both become the city that's it's realizing to be and add space for developments for the ever increasing amount of people moving into town.</p> <p>The fact that the number of employees has steadily gone down from 50,000 in the 80s to 10'000 now is a clear example of why this building has lost its use and is adding very little to the downtown area other than slight historical significance. The TVA block is an eye sore of the downtown area in a prime location that should be used to cultivate and enrich the experience, not to take up 8 acres of space while continually housing fewer and fewer workers.</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	<p>Griffin Ball</p>	

Comment	Response	Commentor Name	Commentor Affiliation
<p>It seems that converting the building into affordable housing is what the city of Chattanooga needs the most. Mixed use developments are becoming more popular across the country. I'm myself work in construction and would welcome the opportunity to discuss some potential options you guys could consider. If you have any decarbonization or sustainability goals in mind for the property, I am also on the ASHRAE task force for building decarbonization, and would be happy to share my knowledge with your team.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Hailey Mick	
<p>I believe alternative 4(A) is the best option. Trying to modernize what is available vs demolition is better for the environment, neighborhood, traffic, etc. There are a lot of ways our community could use the spaces to create a bustling, vibrant downtown area.</p>	<p>Your support for Alternative 4a has been received and recorded. Thank you for your review and your time.</p>	Hannah Lancaster	
<p>I am a Chattanooga resident and have been for nearly 20 years. I also work downtown not far from the TVA complex. My general comments are that: 1) there is nothing wrong with the TVA building currently, except no one is using it, 2) there's no reason to just knock down buildings if their use needs to change, 3) the buildings should be repurposed in a way that benefits the community, like by moving the federal courts operations into it, and possibly other things like the federal defender and US attorney offices here and FBI offices etc., 4) reduce overall costs by winding up leases the government has in other places and turning these huge buildings into federal offices, 5) knocking a perfectly good building down will do nothing for our air quality and who knows what will be leached into the air and soil as a part of that project. My two cents: renovate, put government functions in the space like the federal courts, and lease out the rest that's not needed to generate revenue. We desperately need residential space downtown.</p> <p>OR, donate it to an organization that would turn it into affordable/mixed income housing.</p> <p>It could also be turned into a revenue-generating option by leasing space out or turning one building into residential in the heart of the city.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Heather DeGaetano	
<p>Chattanooga is in dire need for decent affordable housing for full time working citizens. I believe some kind of affordable apartments can be developed in the existing building if that's possible. It would Only be for the people who work full time, earn money to pay the rent, raise their children with their hard earned money only. The crossover bridge over broad Street can be converted into restaurants etc. It could also have a mini mart/hyper market for residents. If there's a flat rooftop which can be utilized then some nice rooftop restaurants can be developed as well with spectacular views of Lookout Mountain and such.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Iqbal Khan	
<p>Option 4 Use some of the space and sell the rest.</p>	<p>Your support of Alternative 4 (renovate some buildings and dispose of others) has been recorded. Thank you for your review and your time.</p>	Jack Keeling	
<p>I believe that at least one of the atrium buildings should be retained. (Signal). The TVA complex is not only a part of Chattanooga's history, but a beautiful representation of TVA's role in leading energy innovation in the latter half of the twentieth century. I think it would be a shame to lose such a fascinating and beautifully designed moment in our history, and I think that its demolition would be looked upon in hindsight as a big mistake.</p> <p>I think that if the public were able to experience the beautiful atria of these buildings, they would be far more beloved for the grand and unique space they are.</p>	<p>Your project input has been received and recorded. We appreciate your review and your time.</p>	Jack Wood	

Comment	Response	Commentor Name	Commentor Affiliation
<p>Option 3. Please sell the land to a local individual or organization that could preserve the history and update the space with local materials in a cost and environmentally sustainable way. The buildings, so long as they are structurally sound, could be used for a wide variety of commercial and community initiatives including education. It would be wonderful if the school system could find a way to educate middle and high schoolers or launch career development and trades programs. The local parking is also a hidden gem. We need affordable safe parking for people that work in the area. Please do not demolish the buildings or sell the land to someone who will price us out of our own area. Preserve and protect our resources for our citizens for generations to come.</p>	<p>TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 3 (dispose of buildings and land) has been recorded. Thank you for your review and your time.</p>	<p>Jaclyn R. Holder</p>	
<p>My opinion is that this 8 acre facility should be demolished and reutilized for new economic development. The current TVA facility is outdated and underutilized and no longer serves the purpose for its original intention. Additionally, by spanning over Broad Street this building complex is a physical and visual barrier between the City Center and Southside Districts, an "urban dam". By opening up 8+ acres in the heart of city, it will allow for new development to address current needs for things like a new, state of the art, federal courthouse, potential expansion of the convention center, as recognized in the latest Tourism Company's study, and residential opportunities to respond to the ongoing housing shortage. This is a once in a lifetime economic development opportunity that should not be missed.</p>	<p>TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.</p>	<p>James Williamson</p>	
<p>Hamilton county board of education has need for safe, quality, well maintained buildings to educate our children. There is also great need for a safe and inclusive exceptional learning location as many of our students do not have a good fit. The schools struggle to incorporate all children and provide a safe environment. With the closure of siskin elc, CCS beginning to limit their exceptional learning acceptance, and other locations struggling, there stands a great need. Whether this becomes a public education site or private, the need stands for all ages babies -21.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Janet Chambers</p>	
<p>Chattanooga's version/response to St. Louis' City Museum: https://citymuseum.org/about/ Featuring and collaborating with local artists. Serving as the tourism hub for Chattanooga. Connect it to the existing library. Then, any space that was economical to do - convert to housing.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Jason Mitchell</p>	
<p>I see it being a booming indoor waterpark. Put the indoor (and perhaps a little outdoor) water park in the yard area on the corner and make the rest of the building into a resort hotel with shops. A mini-Grand Ole Opry.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Jason Shaw</p>	
<p>Do not spend any money that you do not absolutely have to. The building can be sublet to other businesses rather than TVA building a new one. You can consolidate your space needs accordingly. Do not build another building.</p>	<p>The economic impact analysis includes the estimated costs, and these are considered in TVA's decision. Please see Section 3.9 in the Environmental Assessment. Thank you for your review and comment.</p>	<p>Jeff Coppala</p>	
<p>TVA should retain the office complex and get employees back in the office! To many employees are not actually working 40 hours per week from home.</p>	<p>Your support for Alternative 1 (no action) has been noted. Thank you for your review and your time.</p>	<p>Jeff Garrett</p>	
<p>Use the building for affordable housing with small grocery store and pharmacy.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Jenny Wolverton</p>	
<p>Many ideas such as : TVA museum of its history and major projects demonstrate. Also can be a space and facility for community art center, such as paintings, sculptures, stained glass making, wood carvings, etc. The options are endless. Currently the city lacks of a large facility to gather talent and promote artistic culture, you can be the leader to start, build, and grow the trend.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Jin Lambert</p>	

Comment	Response	Commentor Name	Commentor Affiliation
One idea that would help a lot of people would be to take part of the complex to house homeless veterans with a clinic built for them in the building. Take another part for a homeless shelter with a clinic for them. If there is enough room use the rest for drug and addiction rehab. Thank you for your consideration	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Joe F Hogan	
TVA should select the option that brings in the most money possible so you can buy more and reliable generators to prevent rolling blackouts. Maybe you should buy some heat trace, too. That was an inexcusable failing. When I worked at TVA, WE would have hand cranked a generator to prevent a blackout. I am ashamed of you.	The economic impact analysis includes the estimated costs, and these are considered in TVA's decision. Please see Section 3.9 in the Environmental Assessment. Thank you for your review and comment.	John Albright	
Several options I would suggest: 1) Wall off part of the building that you are not using and lease/sell office space to other businesses. 2) Wall off part of the building and sell to developers to renovate for housing. 3) Wall off the part of the building you are not using and give it to the library. 4) If it would not affect the structural integrity of the rest of the building, you could demolish the part of the building you aren't using and sell it to a developer for any other use they want. If that isn't possible, I would suggest demolishing the whole building and selling part of the property to a developer and building a new facility. 5) Give it to UTC.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	John Aldrich	
TVA Chattanooga, Crap Building! Demolish it. Sell land. Let someone build beautiful new icon 20-35 stories skyscrapers on it. No "5 floor" project. This is downtown. The last skyscraper was 1970/80's. Not counting the hostels. Mixture of business, condos, and offices in the skyscrapers. Maybe some shoppings/mini mall. Whatever. Nice little "Central Park". Or.... New upgraded brand new tower builds (X5-7 times larger) for elderly folks and demolish ugly/old twin tower near it. Wishy washy dream on.....	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	John Johnson	
<p>Regarding the public input for what to do with the downtown Chattanooga TVA complex, I would certainly like to see as much of it preserved as possible. As someone who has long been interested in unusual or historic buildings and has written about them as a newspaper writer, the TVA complex is certainly unique and was designed with the assistance of nationally known architects. It also featured some innovative energy concepts for its time.</p> <p>It seems like with all the need for downtown Chattanooga housing, it would fit perfectly into that, particularly the parts with windows, and maybe a retail establishment or restaurants could also be put in it, with maybe the side covered in brick used more for retail. The plaza parts, including the nice amphitheater up near the Patten Towers, should also be preserved and kept open to the public, not closed off to whomever is using the facility.</p> <p>If a federal courthouse is needed, perhaps they can add a new section for courtrooms and holding cells on one outcropping in some new construction that complements the current complex, and maybe use part of the current structure for offices.</p> <p>At worst, at least a good part of the complex should be preserved.</p>	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	John Shearer	
Please tear down the building but leave the small park and expand in that. Chattanooga desperately needs a large City Park. No ball fields or concessions just make it low maintenance with natural plants and trees. Well lit at night and coordinate with the City's director of parks Scott Martin. This could be The Chattanooga Central Park	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your input has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	Jon Mathna	
Demolish and convey, let the private market decide what will happen in downtown.	Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted.	Jon Reinert	

Comment	Response	Commentor Name	Commentor Affiliation
<p>City and County administrative offices should be consolidated into the former TVA Complex to lessen the footprint of municipal office locations in the downtown area and create a one-stop-shop for local government access.</p> <p>The location and accessibility also creates opportunities for public transit and ADA access issues, currently in place in other municipal offices, to be mitigated. This would save local taxpayers millions in renovation costs alone.</p> <p>Updated facilities with shared management allows for a greater degree of synergy for public services and lessens the maintenance and support staff needed to manage multiple government office locations. This alleviates staffing pressures and would be a significant workplace upgrade for municipal office staff.</p> <p>Vacant municipal offices could then be sent for auction to increase the tax base for high value downtown properties. This has a larger and longer economic development benefit for the community.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Joseph Brellenthin</p>	
<p>I think that the TVA building downtown should be sold to be used by the county and the federal court divisions. They could make one half of the building for all county courthouses and then use the other half for all federal related courthouses. This would make it an all-in-one courthouse and centralize all of the courthouses to one location downtown.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Josh</p>	
<p>I would like to see the facility turned into a VA hospital with an emergency department so veterans do not have to travel to Murfreesboro, Nashville, or Atlanta and more doctors can be hired to handle the case load so the community care is changed to an option. Having a facility that can provide surgical needs is a necessity for the area. The building is large enough that the lower level could also be used to provide temporary housing for homeless veterans and give them access to get their records so they can get the benefits and treatment they need. It could also provide a mental health housing area for crisis management cases.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Joshua Aaron Lindsey</p>	
<p>I think the large office building should be converted into a non-profit mental health facility and hospital for all veterans.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Joshua White</p>	
<p>Hello! I wanted to express support #2 as long as.....1) we can recycle as many materials as possible and 2)if the city is open to building back new, retail or mixed use, style buildings - NOT apartments or condos — we have enough.</p> <p>The TVA will leave a large space in the city, it would be nice to ensure it's not just left vacant.</p> <p>I also support any refurbishing options, I know this situation is expensive and we should not be wasteful - many of these building really were built with good materials.</p> <p>Thank you for allowing my input/response, good luck with this initiative!</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	<p>Julia Allen</p>	
<p>Since the TVA buildings already have high security access, I believe the best use of the buildings would be to renovate. Create a federal building complex with the federal courthouse and post office moving into the unused TVA space in the buildings. Also, there is the possibility that other smaller federal agencies could be moved into the space as well, thereby clearing several properties downtown that could be freed up for sale. This seems like the most economical and efficient use of the space, particularly since the money has already been approved by Congress for the new courthouse complex.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Karen L. Beisel</p>	

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<p>I support alternative 2 (unless a federal courthouse adaptive reuse plan would work out). This is what will eventually happen through any of the subsequent alternatives in the long run. (With the exception of alternative 1 which is do nothing, keep as is).</p> <p>Or if the TVA campus could be sustainably adapted to align with plans to expand the Convention Center due to its close proximity; Possibly meeting space to support that concept.</p> <p>I think the developers for any of those projects would rather start from the ground up, so alternative two would be best for all involved.</p>	<p>Your support of Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	Keeli Crewe	
<p>Demolish it and make it green space/park and an event hall. Affordable housing could be a good idea, also, but it's so big and I'm not sure you could fill it.</p> <p>I would say use it for storefront, but with malls failing and commerce being online, that's a bad idea. Making it office space would also be silly with the shift to working from home jobs.</p> <p>Of all the options, the first two could add wealth to the community in one way or another.</p>	<p>TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.</p>	Kelly Skaggs	
<p>I feel this will most likely be converted to housing, however it would be nice to see it utilized in a way that serves the community. I believe that making it a free use education/event area for local businesses, companies, groups etc to use to have events would be a good use. Perhaps attach a small fee to cover building upkeep, maintenances etc</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	Kenneth Mcgehee	
<p>The Chattanooga Office Complex is architecturally unremarkable and has no historic value. As such, when TVA has identified a suitable alternate location for those local employees who require an office, the entire structure should be raised to the ground at TVA's expense.</p> <p>The land could then be made available to private developers under a clearly structured public-private partnership where by the federal government retains a controlling ownership interest in the land but private developers are allowed to source their own capital and deploy their own expertise in developing new uses there. So long as the government maintains control, the land can be held tax-free – alleviating the need for tax increment financing, payment in lieu of taxes agreement, or other incentives – and specific uses may be more directly mandated, such as the inclusion of affordable housing.</p> <p>In any event, the current structures are too inefficient to be remodeled in any way that makes financial sense and in the current design, create unnecessary and unsightly barriers in what should be one of our most walkable and vibrant downtown areas. Demolish and redevelop – but retain ownership!</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	Kerry Hayes	
<p>I think that the building should be renovated. Why spend the money to tear it down and then spend more money to rebuild it. Accommodate all government wants to do. Tear it down and put up new buildings with more construction cost, and more material cost and more labor cost. Stop spending our money!</p>	<p>Your project input has been received and recorded. We appreciate your review and your time.</p>	Larry Reich	
<p>I highly support Alternative 4(a) – TVA would convey four buildings (Signal Place, Lookout Place, Blue Ridge, and Missionary Ridge) through the means described 3 and retain Monteagle Place.</p> <p>Renovating and attracting businesses to the area would benefit the city and citizens with increased jobs and growth.</p> <p>If the buildings were demolished and the land sold they would probably just be bought up and turned into more luxury condos that only help the developers.</p>	<p>Your support for Alternative 4a has been received and recorded. Thank you for your review and your time.</p>	Laurel Pearce	

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Please do not demolish the office or sell it. This space is important to me/us. We work more effectively when in-person as a team. Yes, flexibility is great. But being remote 100% is not effective when getting the job done. I lost my mother suddenly on Christmas Eve of 2020 and life has been a nightmare. It's been nice to assist with family that my mom once cared for, but there's a hard separation of work and home life. Please DO NOT get rid of the COC. We do not need any more apartment buildings downtown to replace it. It's a historical site.	Your support for Alternative 1 (no action) has been noted. Thank you for your review and your time.	Lauren Koerting	
With the plans for a new stadium in the area all or part should be converted to use for tourism. Motel and restaurant spaces along with a TVA museum	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Leslie Warlick	
i THINK TVA should sell the land and use it for something that will benefit the Chattanooga Community and taxpayers. TVA should build another building that accommodate the size of their employment needs in downtown Chattanooga today.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Levina Bass	
Why tear down an impressive building complex? It should be repurposed as affordable housing for the elderly or the lower middle class who cannot afford current housing prices which are much too high. This would help businesses downtown who are hurting due to the decrease in office workers. It also avoids demolition costs.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Linda Wilson	
Apartments.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Margaret Angela Thomas	
You should keep the COC. There's no business reason to keep the Knoxville buildings Knoxville should be closed and move to the COC.	Your support for Alternative 1 (no action) has been noted. Thank you for your review and your time.	Marty Moore	
turn the property into free parking for downtown Chattanooga as the parking there is dismal at best.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Mary Carmichael McMorrow	
The reality we are faced with is one where the federal gov't has in its possession a massive facility that is not serving the community it resides in in a way that makes sense. We need a new federal courthouse; we need more affordable housing units, and we need more affordable commercial space. Moving the ownership of this campus at least in part to the GSA would accomplish this. A portion could be sold off, but a partial transfer to the GSA would solve a lot of our space issues.	Your project input has been received and recorded. We appreciate your review and your time.	Matt Adams	Campaign Manager, Jack Allen for Congress
An energy themed outdoor space. Demolish the buildings and create a park/amphitheater / green space with a nod to TVA's mission for the southeast.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	Megan Freeman	
More free pickleball space in the city of Chattanooga. Indoor and outdoor.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Micah O'Hara	
Demolish and convert the space to a park available to use to the public	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	n/a	

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It would make a great space for Juvenile Court and Child Support.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	n/a	
Have we considered using the space to create educational facilities? Downtown has a shortage of good schools, and the facilities that host most of them are aging and too small. All the apartments and construction will surely mean even more students zoned for the area. The complex could make a great space for everything from daycare through high school.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Natalie Blackwell	
Please demolish the building. A new structure in a prime area of downtown would be beneficial to the whole community.	Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.	Nathan Janeway	
The best thing for the city would be to bring in a large up tech-focused corporation to establish this location as a new campus. Tech focused would mesh well with Chattanooga's gig city nickname and if it succeeds, would attract more companies and more money for the economy. I do not think more restaurants and retail space would work. Warehouse row is right next door. The city should acquire the space to try and bring in a google-type company.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Nic Hembree	
<p>I am submitting this recommendation for Downsizing the TVA Chattanooga Office Complex based on my personal experience having worked in the complex for 30 plus years after the building was built and discussion with other TVA Retirees.</p> <p>To ensure that TVA staff in downtown Chattanooga have adequate space for meetings and related activities, it is recommended that TVA retains a portion of the TVA Chattanooga Office Complex. This location is advantageous as it is centrally accessible, offering employees various dining options and proximity to numerous businesses and agencies in the area. It is feasible to separate a specific building within the complex from the rest, allowing for flexibility in its utilization.</p> <p>As TVA may no longer require the entirety of the current space, it is suggested that the excess space be sold to interested parties who can adapt it to suit their specific needs.</p> <p>In addition, the Chattanooga Courthouse should be given the opportunity to purchase a portion of the TVA Chattanooga Office Complex, potentially further benefiting both parties involved.</p> <p>By reutilizing the existing TVA Chattanooga Office Complex, it would avoid potential adverse environmental effects from demolition of the building.</p>	Your support for Alternative 4 (renovate some buildings and dispose of others) has been recorded. We appreciate your review and your time.	Norman Rockwell	
I think, after it is assessed for environmental issues, it should be turned into apartments. We need more housing in Chattanooga and the surrounding areas.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	P.J. Hogan	
Simply convert it to housing, a new school of nursing for UTC and a regional history historical center. The new Federal Courthouse needs to be a vista high rise on Hawk Hill that will be a reminder to us all of the role the Federal Government plays in our everyday lives.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Pat Christnacht	

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<p>Here is my idea to for the former TVA building in downtown Chattanooga. One the first floor it would be offices known as the Captain Larry Taylor's Community Support Center. Offices for those to help with employment, Veteran Affairs, Section 8, and other benefits including Lawyers for Disabilities.</p> <p>Floor 2 would be the Desmond Doss remote Veteran's Clinic for our Veteran's and their ailing health and mental health services.</p> <p>The remaining floors would be the Charles H Coolidge Veteran's housing. This would remove homelessness for our Veteran's. Each would have small bedroom, living space, bathroom, small kitchenette and laundry closet.</p> <p>This is a way to put those whom have out their freedom below ours to serve and defend this country. Naming these after Medal of Honor Recipients and honoring those who called Chattanooga home or was laid to rest here. This should be honored by supporting our elderly Veteran's and our Veteran's who are in need of care.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Rachel Gossett</p>	
<p>Tear down all buildings or keep some for retail mini mall and have green space for city visitors and locals. That way it help environment and provide more activities to visitors staying downtown.</p>	<p>TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.</p>	<p>Rebecca</p>	
<p>I live just south of the HQ off Main Street and work across 11th street from the HQ, which is what I see from my office window. As someone who traverses the site multiple times per day I would like to advocate for the complete removal of all structures as they are not human-scale, nor do they allow the occupants to interact with the street.</p> <p>Since there is no option for a large renovation, I am to assume that there was work to consider a conversion to other uses such as housing and commercial activities, but that is not feasible. Full removal would allow the site to be rebuilt with new structures that would allow street-facing activities that would improve the live-ability of this part of downtown. Redevelopment will also allow for 24 hour occupation of the site, which could attract more investment into this part of downtown. A complete redevelopment also allows for creative designs that increase public access and could increase available greenspace, which is lacking in this area.</p> <p>My one concern with complete removal is that this could be completed without a plan in place, which could result in 9 acres of vacant land with a 20-25 foot deep hole that lasts for years. If the complete removal is the selected choice I would request that TVA immediately hire a firm to create a master plan for the future of the site so that it does not sit stagnant for any length of time longer than necessary.</p>	<p>TVA considers all environmental and economic effects of each proposed action when determining the decision; please see Section 3 in the Environmental Assessment. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and comment.</p>	<p>Richard Groves</p>	
<p>Great location for a retirement community. Thanks</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Richard M Rector</p>	

Comment	Response	Commentor Name	Commentor Affiliation
<p>Do what you want with the space downtown, receive the most you can for the asset. I just needed to take this opportunity to remind you that TVA is in a unique position to help drastically save the world by mitigating</p> <ul style="list-style-type: none"> - cancer deaths with the production of alpha-emitting medical isotopes - save the NASA deep-space mission abilities by producing Pu238 - desalinate salt water using waste-heat - mitigate the thousands who die each year from the epidemiological cost of coal, LNG, and other pollutants related to hydrocarbon fuels - solve the high-level spent-fuel question - end weapons proliferation concerns - restore pride to the history of national innovation. - revitalize the national economy as much as you would your own balance sheet. <p>All you have to do, is PLEASE build the correct reactor. They proved the concept in Oak Ridge half a century ago. Liquid Fluoride Thorium Reactors. Please. Save the world. TVA is in arguably the best position to do so and an army of us students, scientists and start-ups are ready to help. Do the right thing. Build what Weinberg and Seaborg said was the only correct reactor to build for civil energy. The safest, greatest and world-changing. thorium breeder. Build the LFTR. Please restore my hope in my country and TVA.</p>	<p>Reactors are outside the scope of this EA. We appreciate your review and your time.</p>	<p>Riley Brigg</p>	
<p>I like Alternative 3 and Alternative 4(a). I don't think all of TVA should be retained but there should be some remembrance. Alternative 1 and 2 are a complete no. 4(b) is also a complete no. 4(c), 4(d) could be considered based on what's best to retain, which building can be adaptively reused.</p>	<p>Your support for Alternative 3 and Alternatives 4a, 4c and 4d have been noted. Thank you for your review and your time.</p>	<p>Ritika Narang</p>	
<p>Please demolish it. It is a huge wall separating the Southside from Downtown and blocks the ability to continue developing the area to meet Chattanooga's growing population and tourist industry. Thank you.</p>	<p>Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.</p>	<p>Robert Maedgen</p>	
<p>Recommendation: Get appraisal Advertise nationwide Sell to developers Let developers use their expertise to make the TVA complex an asset to Chattanooga again. I am certain there are developers in Chattanooga who could handle such a large project.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Ronnie Holden</p>	
<p>As an entrepreneur and business owner in the Chattanooga area, I ask that you consider remodeling the downtown complex to be a business enterprise center. It would be consistent with Chattanooga, Hamilton County, and Tennessee's desire to bring new businesses and technology development to the downtown and region. Having the fastest and most reliable internet in the country will add to the attractiveness of this center. Most early-stage ventures suffer from a lack of access to timely and affordable business development resources. The new enterprise center would offer existing local businesses (law, engineering, printing, media, and advertising firms) and new businesses a place to operate efficiently and economically. It could also house a small business hotel for visiting experts and out-of-state executives. It could be a forum for business and technology experts to present. It could serve as an excellent location for local college and university students to study and intern. Technology companies worldwide would use the center as a test bed for new technologies and concepts. A resource like this would become an economic jewel for the region and make Chattanooga the envy of many tech and new enterprise communities. I would be happy to talk about the details of such a facility if you'd like to move in this direction.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Rush Simonson</p>	<p>Juvent</p>

Comment	Response	Commentor Name	Commentor Affiliation
I love the idea of turning the space into an indoor/outdoor botanical garden.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Russ Troutt	
A few short years ago, the TVA Chattanooga office was renovated extensively. How about keeping it open and combining the remnants of the Knoxville office in Chattanooga? After all, Knoxville has been shrinking for years and is at the Eastern edge of the TVA territory. That office has even shut down one of the buildings TVA occupied and leased it out to others. Chattanooga is far more central and could hold the entire population of the Knoxville office.	Your support for Alternative 1 (no action) has been noted. Thank you for your review and your time.	Russell Turner	
I would like to see Chattanooga bring some more entertainment to the area similar to what Knoxville currently has. For example, the Knoxville Civic Coliseum. I believe this would be a good addition to an already booming area to bring in a venue that can host concerts, shows, and have a local hockey team that the city can get behind. Chattanooga has already been successful with two soccer teams and the Lookouts, showing that the city will buy in and support their local sport organizations. Between the restaurants and night life, I believe this will help Chattanooga become a bigger tourist attraction than it already is.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Ryan Lowe	
<ol style="list-style-type: none"> 1. Since University of Tennessee at Chattanooga (UTC) is lacking housing for college students right now, will you consider working with UTC to convert a temporary dormitory until this matter is resolved. 2. There are problems with homeless in Chattanooga, would you consider work with city to create a training center to help these unfortunate people get back on their feet. 3. Sell the property to Chattanooga Trade Center which is next door to it, this will bring more people and tourists to visit Chattanooga. 	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	S. Bunnag	
Demolish the building and create a downtown Food Hall and shopping center. Very similar to the Assembly Food Hall area that Nashville has on Broadway. Also include recreation spots as well.	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	Samuel	
I am a retiree of TVA so my opinion is a little biased. I worked in Facilities and our job was to keep the complex running smoothly when employees were relocated or when they needed something to do their job. In my opinion, this building should be left upright and reused. The amount of debris from a demolition would be astounding and create problems. There are options: a Federal courthouse, apartments (which the city seems to LOVE developing), shops, whatever might come to mind. I believe a courthouse would be possible with the underground access that might be needed. And possibly apartments or condos on other sections. Please seriously think about NOT tearing down the complex.	Your project input has been received and recorded. We appreciate your review and your time.	Sanda Mohr	
Please consider selling to another organization. There is enough construction happening downtown as is. The buildings are in good condition	Your support for Alternative 3 (dispose of buildings and land) has been noted. Thank you for your review and your time.	Sarah feely	
Please demolish and replace with a large park. There is very little green space in downtown as a whole. A park with many trees would help to revive that area and bring visitors downtown. A park is desperately needed.	TVA cannot reasonably foresee how the COC or land will be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Your support for Alternative 2 (demolish the buildings and dispose of the land) has been recorded. Thank you for your review and your time.	Sarah Hughes	
There are plenty of Federal Agencies that are struggling for usable office space, why not rent a portion to them. Also renovating and turning into apartments for homeless veterans.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Sonya	

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Alternative #2, tear it down.	Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.	Steve Blevins	
Create another K-12 school that is the same teaching style as CSAS/CSLA. A gym with courts available for the public to rent out for basketball, volleyball, pickleball, etc. A co-op shared space for remote workers, small businesses to use, that has small office areas and conference rooms.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Subin Joseph	
Stay in this complex and save the money to invest in areas that keep electricity rates and other fees low to the public.	Your support for Alternative 1 (no action) has been noted. Thank you for your review and your time.	Thomas Beandler	
Build a new federal courthouse or develop a combo offices, hotel and apartments.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Timothy White	
The city has a convention center but it is the only space large enough for events and they have become out of touch and have let the facility degrade without any renovations. I would love to see a second convention center space for larger events to compete with the sub par current Chattanooga Convention Center. Help boost more tourism. Allow competitive pricing and or even allow larger events as a supplement to the current Convention Center space.	At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.	Todd	
I spent almost 30 years working in three different buildings of the TVA Chattanooga Office Complex, and I remember them fondly. TVA did some very important things to meet its general mission of betterment when they built the COC: they helped restore the vitality of a struggling city by a strategic lack of workforce parking and lunchroom facilities, provided strong support of shuttle services, and they advanced the state of energy-conserving office architecture with the most energy efficient office building in the country. The COC is iconic architecture worth preserving in Chattanooga's skyline going forward. But possibly not in its entirety. It may be possible to shrink the footprint of TVA to promote a better, denser downtown. Corporate management fads come and go. Right now, an awkward post-pandemic work-from-home/part-time in office regime is prevalent. It won't always be so. TVA's still-sizable workforce should continue to be an important constituent part of downtown. Moving to a cloistered location on Cameron Hill, The Bend, or other remote location would damage Chattanooga. Downtown needs people in order to be healthy and vital.	Your project input has been received and recorded. We appreciate your review and your time.	W Allen Miller	
TVAs best option would be to sell the COC "as-is". Several years ago there was a conceptual plan to move the COC to a new facility to be built at the end of Amnicola Hwy. This was not done due to the out cry of downtown business owners (mostly restaurants) who feared loss of customers. Now that TVA Chattanooga office employees mostly work from home, the downtown business owners would most likely benefit from something else being at the market street location (like a federal courthouse) Please make sure the ratepayer's do not invest any additional funds in the current COC if TVA does decide to move to another location. Also no reason for the ratepayers to pay to demolish the building.	Your support for Alternative 3 (dispose of buildings and land) has been noted. Thank you for your review and your time.	William Lewis	
My preference is that the TVA buildings should be demolished and the land sold. Since its construction, the TVA complex has physically and psychologically split downtown into two sections. The growth in the Southside should eventually "connect" to the central business district, and that would be made easier without the looming presence of the TVA complex. Also, the TVA buildings are, to me at least, architecturally unappealing. The western section of the property is an ideal location for the new federal courthouse, which will be a seminal architectural feature of the city. The remaining land could be used for complementary public space or development.	Your support for Alternative 2 (demolish the buildings and dispose of the land) has been noted. Thank you for your review and your time.	Zac Greene	

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<p>I work at the VA in Chattanooga as a provider and really feel our Veterans need a hospital here in Chattanooga. We are two hours away from our main hubs in Nashville and Murfreesboro. The TVHS spends over \$400 million a year in Community Care. One of the costly reasons is because Chattanooga just does not have the medical resources it needs for our Veteran population. We service a large population of Veteran and if we have a state of the art Medical Hospital in Chattanooga, we could provide the adequate care they deserve. I am proposing the Chattanooga TVA building be repurposed as the Chattanooga Medical Center.</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Zach Wilder</p>	
<p>As a career TVA employee (1977-2006, and part-time contractor to TVA after retirement, predominantly at BLN) who worked in multiple organizations in TVA (Nuclear, Fossil, Scrubber retrofits on Fossil Plants, Gas Turbines, and other smaller projects) I understand that the number of TVA employees has been reduced and technologies for generation continue to change. That said, I also understand the limitations of not having multiple employees and organizations within close proximity at the same office complex. The "team" environment that is needed to develop major projects is not easily accomplished by employees being isolated from each other. The interactions of the "teams" are vitally important for communications with various team members (often from various organizations) and these communications are not efficient through "zoom" calls and texts or e-mails. Those options are similar to putting a major league outfielder out in the parking lot outside the stadium and expecting him to play his position from there. The interaction of various team members on a daily basis is vital to success. Often just overhearing someone else's conversation will provide information to other team members that is important to a project. That doesn't happen if many of the team members are isolated from each other.</p> <p>In addition, many of the proposals being made to generate power have excessive limitations and risks. Base load power is not reliable if it is expected to be provided by solar and wind. If you didn't notice a large solar farm in Texas was recently virtually totally destroyed by a hailstorm. Wind is not reliable unless you have almost totally consistent wind conditions, i.e., not enough wind and they don't produce anything and too much wind and they have to be shut down to prevent damage to the equipment. In both situations, natural events such as major winter storms provide issues to both of these options as Texas experienced just a few years ago. IF the effort to make a significant transition to EVs occurs anytime soon (which I seriously doubt), that will cause another significant increase to the need for base load power.</p> <p>There seems to be a culture that has developed of people coming up with nice ideas without any concept of the potential long-term issues or potential problems created by these nice ideas (such as exists with a major transition to EVs which will require a huge investment in infrastructure BEFORE that transition can ever be thought to be efficient, not to mention the cost of replacement batteries, disposal of the used batteries, etc.). Yes, I am "old school", but old school works and the climate mongers among us would have us believe the sky is falling when history tells us that the climate has been changing ever since God created the Garden of Eden. It is common knowledge that it was thought in the 60s and 70s that we were headed to a new Ice Age and that Manhattan would now be in the middle of an iceberg.</p> <p>Sorry for the discourse above but experience is a valuable teacher and asset. With regards to the Chattanooga office complex it would seem that renting or selling 2 or 3 of those building would make sense given the reduction in the number of employees utilizing that space. It doesn't seem to make sense to destroy the complex when it should still be a viable work space for a large number of people. The city of Chattanooga should be able to recruit some companies that could utilize those buildings, especially since many companies are looking to relocate from other areas and states who would likely take a close look at relocating some of their operations to Chattanooga. Downsizing is one thing, but unnecessarily destroying a viable asset seems to be overkill. I believe just downsizing and liquidating a portion of the complex makes the most business sense for TVA.</p> <p>Having worked on numerous NEPA efforts in the past I wish all of you the very best in completing this effort and coming to a conclusion that represents what is best for everyone in the Valley that is reliant on TVA since that is what the TVA Act strove to achieve.</p>	<p>Your project input has been received and recorded. We appreciate your review and your time.</p>	<p>Thomas J Myers</p>	
<p>The Chattanooga Area Regional Transportation Authority (CARTA) is a public transit agency serving the Chattanooga metropolitan area. CARTA provides bus services, including demand-response, fixed-route and paratransit options, and also operates the Chattanooga Parking Authority, all to enhance regional mobility. Known for its commitment to sustainability, CARTA has implemented electric buses and other eco-friendly</p>	<p>At this time, TVA cannot reasonably foresee how the COC or land would be used after disposal under any of the proposed action alternatives; however, your comment has been noted and will be taken into consideration. Thank you for your review and your time.</p>	<p>Philip Pugliese</p>	<p>Chattanooga Area Regional Transportation Authority</p>

Comment	Response	Commentor Name	Commentor Affiliation
<p>initiatives such as public bike share and electric vehicle car share networks. The agency focuses on fostering accessible and efficient public transportation solutions to meet the diverse needs of the community.</p> <p>A proposed reimagination of the existing TVA facility would be as a CARTA Mobility & Innovation Center. This Mobility & Innovation Center represents a visionary multi-use facility designed to seamlessly integrate various components essential for a sustainable urban future. At its core, the hub serves as a central nexus for battery electric shuttles and buses, micromobility solutions, and potentially autonomous vehicles incorporating state-of-the-art technology including wireless inductive charging. This innovation not only positions the hub as a showcase for cutting-edge transportation solutions but also underscores its commitment to advancing eco-friendly practices, setting a new standard for the region.</p> <p>One distinctive feature of the facility is the inclusion of a STEM/STEAM student and workforce training center, with a specific focus on battery electric infrastructure and vehicle technology. This additional floor is dedicated to fostering education and skill development in science, technology, engineering, arts, and mathematics, ensuring that the workforce is equipped with the expertise needed for the evolving landscape of sustainable transportation. Furthermore, by co-locating governmental offices on another floor, the hub becomes a focal point for collaboration between public and private entities, streamlining decision-making processes and facilitating effective urban planning.</p> <p>To enhance inclusivity and address housing challenges, the Mobility & Innovation Center proposes an additional floor dedicated to affordable housing, primarily tailored for students and the workforce. This mixed-use approach not only addresses the housing needs of these demographics but also fosters a dynamic and diverse community within the hub. Consideration for retail spaces within the facility further enriches the overall urban experience, creating a vibrant atmosphere supportive of local businesses. The Mobility & Innovation Center, with its multi-faceted design, emerges as a pioneering model that harmonizes sustainable transportation, education, governance, and community living.</p> <p>The proposed project stands as a transformative initiative for our community, heralding a new era of urban development. At its core, the mobility center for the urban core promises to redefine the way residents navigate and connect within our city. By consolidating various transportation services under one roof, the project seeks to streamline accessibility, reducing congestion and improving overall mobility. Crucially, the commitment to being carbon-neutral and sustainable is poised to be a game-changer for our region. The integration of eco-friendly technologies, such as electric buses and sustainable infrastructure, not only contributes to a cleaner environment but also holds the potential to significantly improve public health outcomes. Reduced emissions and improved air quality resulting from sustainable transportation choices will directly benefit the well-being of our residents.</p> <p>The project's emphasis on student and workforce training further cements its transformative impact. By establishing a dedicated training center focused on emerging fields such as battery electric infrastructure, the project aligns with the needs of current and future generations. This investment in education ensures that our community remains at the forefront of technological advancements, fostering a skilled workforce prepared for the challenges of the evolving urban landscape.</p> <p>In addressing the critical issue of affordable housing, the project demonstrates a holistic approach to community development. By incorporating housing solutions tailored for students and the workforce, it not only tackles the housing shortage but also creates a more inclusive and vibrant community within the urban core. This multi-faceted project aspires to be truly transformative, setting a precedent for sustainable urban living, education, and affordability in our community.</p>			

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<p>Air Pollution Control TDEC's Division of Air Pollution Control offered the following comments as it related to the Draft EA: • Air Quality Impacts: TDEC notes several actions could negatively impact air quality on a short-term basis and recommends that TVA evaluate potential impacts to air quality prior to any clearing, demolition, or construction using AirNow. These impacts may include, but are not limited to, air pollution from construction equipment, open burning associated with land clearing activities, and fugitive dust. • Asbestos: The EPA and TDEC enforce federal regulations regarding asbestos renovation and demolition activity for projects that involve the demolition or renovation of structures. These regulations apply to any building or structure known to contain asbestos and to any facilities proposed to be demolished. When any structures are proposed to be demolished, an asbestos demolition notification must be provided in advance, and proper pre demolition surveys must be conducted to identify any regulated asbestos containing material (ACM) present. Prior to any demolition, all facilities must be examined for ACM, and all potential ACM in the buildings proposed for demolition must be handled and disposed of in accordance with the applicable Federal, state, and local regulations. Tennessee's asbestos regulations can be found in Chapter 1200-03-11 of the Tennessee Air Pollution Control Regulations (TAPCR). • Idling: Truck traffic associated with construction projects generate emissions of PM, CO, NO₂, SO₂, VOC, and CO₂. TDEC recommends the operation of trucks with up-to-date emission control technologies, proper maintenance to minimize vehicle and equipment emissions, and the adoption of best practices to minimize vehicle idling to minimize the impact of mobile source emissions on ambient air quality. • Fugitive Dust: TDEC recommends the use of wet suppression or other measures to minimize the generation of fugitive dust if generated in construction activities. • Site Remediation: For any remediation projects involving mercury or lead-based paint, TDEC recommends that TVA follow best practices to minimize emissions into the ambient air. • Local Air Programs: The Chattanooga Office Complex is in the jurisdiction of the Chattanooga- Hamilton County Air Pollution Control Bureau. TVA should contact the local program for additional guidance on air permitting and compliance for the proposed project.</p>	<p>TVA will complete all required inspections prior to any action, and any action by TVA will be in compliance with all applicable Federal, state and local regulations. Any action by TVA will follow best management practices and agency guidance, including local air programs. Mitigation measures described in Section 2.3 of the Environmental Assessment (EA) address management of asbestos and dust for any action by TVA. The EA specifies that solid, hazardous, and liquid wastes discharges, and air emissions are managed in accordance with applicable federal, state, and local laws and regulations and applicable permit requirements. If the selected alternative includes demolition, TVA will coordinate with Hamilton County on potential air quality concerns (please refer to Section 1.7.2 in the EA). TVA thanks TDEC for their review and comments on the EA.</p>	<p>Rachael Maitland</p>	<p>Tennessee Department of Environment and Conservation (TDEC)</p>
<p>Water Resources TDEC notes that TVA would be required to obtain a NPDES Construction General Stormwater Permit (CGP) if the decision results in the demolition of the buildings and the demolition is down to soil level, as proposed in Alternatives 2 and 4. TDEC's Division of Water Resources encourages erosion control measures to be taken even where the land disturbance is less than one acre, where appropriate.</p>	<p>As stated in Section 2.3 of the EA, the TVA will obtain a NPDES permit along with the City of Chattanooga Land Disturbance and/or Stormwater permit prior to implementing any action. The EA also specifies that any action by TVA would include implementation of standard BMPs for erosion and sediment control, proper containment/treatment/disposal of wastewaters, stormwater runoff, wastes, and potential pollutants. TVA thanks TDEC for their review and comments on the EA.</p>	<p>Rachael Maitland</p>	<p>Tennessee Department of Environment and Conservation (TDEC)</p>

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<p>Solid Waste Management TDEC notes that all wastes associated with construction in the proposed project must be handled in accordance with Tennessee's Solid and Hazardous Waste Rules and Regulations, including all material that would be classified as solid and/or hazardous wastes. Construction may include but is not limited to unforeseen damages and repairs, cleanup, grading, excavation, testing of subsurface conditions, confining sediment, surface stabilization, leaks, and spills. Tennessee's Solid Waste Management program only dates back to 1972 so there could be disposal in the area that predates records and represents a legacy solid waste site. Any waste uncovered during this project, including lead-based paint, asbestos containing material, and PCB's encountered should be disposed of in accordance with all applicable laws and regulations. TDEC conducted a review of state and federal databases for the project site and noted numerous hazardous waste generating sites within one mile.</p>	<p>Section 2.3 of the EA specifies mitigation measures to minimize negative impacts of solid and hazardous waste. TVA would manage all solid wastes in accordance with applicable federal, state, and local laws and regulations and TVA BMPs, including temporary storage on-site and permanent storage off-site. Impacts from RECs that were identified during the Phase I ESA would be addressed prior to soil removal and appropriate action would be taken in accordance with federal and state regulations. TDEC Underground Storage Tank System Closure Assessment Guidelines would be followed for removal of underground storage tanks located on site. Any asbestos-containing materials located in the buildings would be managed in permitted facilities/landfills. Only a minimal amount of asbestos-containing materials are anticipated to be in the current buildings. Hazardous waste would be hauled to a permitted waste management facility designated to receive such waste. Waste would be hauled by truck to offsite landfills or recycling facilities. TVA thanks TDEC for their review and comments on the EA.</p>	Rachael Maitland	Tennessee Department of Environment and Conservation (TDEC)
<p>Archaeology Based on the information provided, no significant archeological resources will be disturbed by the proposed project. No archaeological sites are recorded in the project area and the property has been heavily disturbed by construction. Thus, no further work is recommended.</p>	<p>The effects analysis for cultural resources in Section 3.13 of the EA also found there is no remaining archaeological potential at the site. TVA consulted with the Tennessee SHPO and Tribes; they concurred with this finding. TVA thanks TDEC for their review and comments on the EA.</p>	Rachael Maitland	Tennessee Department of Environment and Conservation (TDEC)