

## **FINDING OF NO SIGNIFICANT IMPACT TENNESSEE VALLEY AUTHORITY**

### **CHATTANOOGA OFFICE COMPLEX RENOVATION, DEMOLITION, AND/OR SALE PROJECT**

Since the onset of the COVID pandemic in Spring 2020, a substantial percentage of TVA Chattanooga Office Complex (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 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.

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. The proposed action includes alternatives that seek to 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 evaluated by TVA do not limit future uses to the potential courthouse.

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.

#### **Alternatives**

Under the No Action Alternative, TVA would retain ownership of and remain 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 were evaluated.

Under Alternative 2, TVA would demolish the COC, either in stages or all at once, and dispose of the COC land and applicable land rights (land). 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 applicable disposal authorities available to TVA, which could include a public auction or transfer to the GSA.

Under Alternative 3, TVA would dispose 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.

Alternative 4 presents four options that 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). 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.

Under 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.

Under 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.

Under 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.

Under 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.

## **Environmental Assessment**

The potential impacts of the proposed action alternatives are described in detail in the Environmental Assessment (EA). In the EA, TVA analyzed potential impacts to the following environmental and socioeconomic resource areas:

- 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

Implementation of Alternative 2 would result in minor adverse impacts on air quality, greenhouse gases, and climate change due to a temporary increase in airborne soil and dust and a temporary increase in vehicle emissions associated with demolition activities.

No impacts on land use are anticipated; disposal would be consistent with applicable land use laws and regulations.

With implementation of a Soil Management Plan, there would be minor adverse impacts on soil and geology resources.

Noise impacts would be minor to moderate; 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. Adverse impacts from vibration would be temporary and minor.

There would be moderate adverse transportation impacts during demolition due to increases in truck traffic and altered traffic patterns.

Demolition would alter the scenic attractiveness, integrity, and visibility of the Project Area, resulting in a minor adverse impact on visual resources.

Impacts on wildlife would be minor with implementation of measures including a survey of unmaintained buildings and possible coordination with USDA-Wildlife Services or other state and federal agencies as appropriate.

Wind-carried dust could affect managed and natural areas and recreational resources, but with implementation of a Fugitive Dust Control Plan and wet suppression, impacts would be minor and temporary.

TVA would manage all solid wastes in accordance with applicable federal, state, and local laws and regulations and TVA BMPs. Any hazardous waste would be hauled to a permitted waste management facility designated to receive such waste. As a result, there would be minor adverse impacts on solid and hazardous waste.

Through implementation of standard BMPs for erosion and sediment control, proper containment/treatment/disposal of wastewaters, stormwater runoff, wastes, and potential pollutants, impacts on surface water quality would be minor and temporary.

Demolition would result in minor beneficial impacts from hiring construction workers and there would be socioeconomic benefits if the COC site is more fully utilized. There would be no disproportionate impacts on disadvantaged communities.

Public health and safety would experience minor, short-term adverse impacts associated with demolition; coordination with appropriate state and federal agencies would minimize those impacts.

Alternative 2 may affect but is not likely to adversely affect the federally listed gray bat, Indiana bat, or northern long-eared bat with implementation of measures including a survey of unmaintained buildings. It would not jeopardize the continued existence of the tricolored bat.

As the COC is ineligible for the National Register of Historic Places and there are no longer any intact archaeological deposits on the site, TVA finds that none of the proposed action alternatives would affect any historic properties. TVA also determined there are no historic properties in the Area of Potential Effect (and therefore no effects). Through Section 106 consultation, the Tennessee Historical Commission concurred with these findings; no consulted tribe objected or identified resources of concern in the affected area.

Under Alternative 3, impacts (adverse or beneficial) would be limited to socioeconomics and environmental justice: there would be beneficial socioeconomic impacts if the COC site is more fully utilized and there would be no disproportionate impacts on disadvantaged communities. Disposal of the COC "as-is, where-is" would not impact other resources.

Under Alternative 4, the impacts of partial demolition would be similar to those under Alternative 2 but less in intensity because only a portion of the buildings would be demolished. Renovation of one or more buildings would result in emissions and dust that contribute to minor adverse impacts on air quality, greenhouse gases, and climate change. Renovation would also result in minor adverse impacts on other resources including noise, transportation, managed and natural areas, recreational resources, and solid and hazardous waste. Finally, separation and reconnection of utilities and services during partial demolition, renovation, and/or disposal would result in minor temporary adverse impacts on utilities and service systems.

### **Public and Intergovernmental Review**

A draft EA was made available for a 30-day public review period 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, and residents of Patten Towers received notification of the comment opportunity. 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.

TVA received a total of 132 comments. 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.

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. TVA found that the alternatives would not affect historic properties, and the Tennessee Historical Commission and Tribes concurred with this finding.

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 of the EA). No other federally listed species have the potential to be impacted by the action alternatives.

### **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.

#### Best Management Practices and Routine Measures

##### *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.

##### *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.

##### *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.

### *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.

### *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.

### Mitigation Measures

#### *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.

#### *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

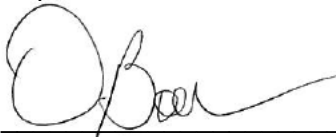
and updated in May 2023 (USFWS 2018, 2023a). Relevant conservation measures that would be implemented as part of the approved project are listed in the bat strategy form. The bat strategy form is included as Appendix B.

*Transportation*

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

**Conclusion and Findings**

Based on the findings and analyses in the attached EA, with adherence to BMPs, adherence to permit conditions, and measures to mitigate minor and moderate adverse effects, TVA concludes that all of the proposed action alternatives would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.



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June 25, 2024  
Date Signed