U.S. Department of Veterans Affairs

Nashville, Tennessee Veterans Affairs Outpatient Clinic
Final Environmental Assessment

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

Prepared by:
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Executive Summary

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

Purpose and Need

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

Proposed Action

VA's Proposed Action is to award a lease to a private entity that would construct an approximately 212,301-square-foot OPC for VA to lease and operate for up to 20 years in Nashville, TN. The OPC would include no more than three floors, in a modern-quality building, and would include other site improvements, amenities, and landscaped open space areas. The OPC would be designed and built to VA design criteria and in accordance with local building and zoning codes. Two existing OPCs would close after the proposed new OPC opens – the Albion Street VA Clinic and the Charlotte Avenue VA Clinic.

Alternatives

VA is considering the following two locations for the proposed OPC lease (Proposed Action):

- 0 (1903) Baptist World Center Drive (Alternative A)

The Alternative A site consists of approximately 22 acres of unimproved wooded land within a mixed-use neighborhood. The site is surrounded by developed land on all sides except to the south, with residential properties and a retail strip center to the north, residential properties to the east, and the South-Central Conference of 7th Day Adventist to the west. The Cumberland River and American Baptist Seminary are located to the south. From the late 1930s to the mid-1970s the site was used for agricultural and residential purposes, consisting of fields, forested areas, and agricultural and residential structures on its north end. By the 1980s, the site consisted of mostly wooded land with overgrown fence rows left in the northern portion of the property, and since the early 1990s the site has consisted of unimproved wooded land.

- 0 Ashland City Highway and 0 Clarksville Pike (Alternative B)

The Alternative B site consists of two parcels of land, one that is approximately 18 acres and another that is approximately 2 acres, totaling about 21 acres of undeveloped land. The site is surrounded by mixed commercial and residential developed areas, bordered by undeveloped land to the north, mixed residential and commercial properties to the south, commercial properties to the east, and a power substation and residential properties to the west. The site has consisted of wooded, undeveloped land since the late 1930s with no evidence of any past or present land use.

No Action Alternative

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

Affected Environment and Environmental Consequences

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

Table ES-1. Summary of Potential Impacts

Environmental Resource Area	Proposed Action Alternatives A and B	No Action Alternative
Aesthetics	The proposed physical changes under the Alternatives would not detract from the surrounding aesthetics. Aesthetic impacts during construction activities would be temporary and less than significant. Physical changes to the site would be consistent with existing architecture as well as landscaping. Aesthetic impacts would be **less than significant.**	None
Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity maintenance area de minimis threshold. Air quality impacts would be **less than significant.**	None
Cultural and Historic Resources	It is unlikely that the Proposed Action would affect historic properties or impact cultural or archeological resources. The Proposed Action would not impact historic buildings within the area of potential effects. On October 28, 2025, the Tennessee Historical Commission provided concurrence for VA's finding of no historic properties affected and had no objection to the implementation of VA's Proposed Action. No comments were received from federally recognized Indian tribes during consultation. VA addressed comments received from the Nashville Historical Commission on October 21-23, 2025 concerning remnants of structures located within and adjacent to the Alternative A parcel being considered for lease for the Proposed Action. Impacts on cultural resources and historic properties would be **less than significant.**	None

Geology and Soils	Ground-disturbing activities would have minimal changes to topography. Ground disturbances would be stabilized during operation and all permit requirements would be met. Davidson County is designated as a Zone 1 area for radon, meaning predicted average indoor screening levels are greater than the USEPA's 4.0 pico-Curies per liter action level. The proposed OPC would be designed and built to VA design criteria while incorporating radon-resistant features and construction methods to mitigate the potential for radon. Impacts to geology and soils would be **less than significant.**	None
Hydrology, Stormwater, and Water Quality	Implementation of measures identified in the National Pollutant Discharge Elimination System permit and site-specific Storm Water Pollution Prevention Plan (SWPPP) would minimize erosion and sedimentation impacts related to construction activity. The SWPPP would contain Best Management Practices (BMPs) designed to minimize stormwater pollution. If shallow groundwater is encountered during construction, appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems, would be implemented. Onsite stormwater engineering controls to retain and manage stormwater flow would be designed and implemented to include a retention basin or stormwater management facility. Construction and operational activities would further comply, to the extent practicable, with local agencies' requirements, resulting in **less than significant** impacts to hydrology and downgradient water quality.	None
Wildlife and Habitat	In advance of any proposed tree clearing between March 1 to September 30, the private entity would be required to conduct a pre-construction clearance survey to determine the presence/absence of nesting migratory birds protected under the Migratory Bird Treaty Act (MBTA), and coordinate with United States Fish and Wildlife Service (USFWS) to determine the potential need for non-disturbance buffers or other mitigation. For Alternative A, a letter recording VA's determination of *"not likely to adversely affect"* for the tri-colored bat was provided by USFWS on September 16, 2025 (Appendix B). As indicated on VA's IPaC submissions, the "not likely to adversely affect" determination for the tri-colored bat is contingent upon USFWS time-of-year restrictions for listed bat species.	None

	For Alternative A, the private entity would limit tree clearing to the USFWS-recommended clearing period, outside of the tri-colored bat species pup season (May 15 to July 31). A project review request was submitted to the USFWS Tennessee Ecological Field Office on September 26, 2025 for Alternative B to obtain concurrence with the effect determinations (may affect, not likely to adversely affect) for the northern long-eared bat and tri-colored bat. USFWS concurrence was received on September 29, 2025 (Appendix B). For Alternative B, USFWS time-of-year restrictions for listed bat species would be implemented. The private entity would limit tree clearing to the USFWS-recommended clearing period, outside of listed bat species' pup season (May 15 to July 31). Additionally, the private entity would reduce, to the extent feasible, nighttime lighting and noise/vibration near roost habitat during the active pup season. No adverse effects to designated habitat or listed species are anticipated with implementation of conservation measures and BMPs, resulting in **less than significant impacts** to wildlife and habitat.	
Noise	Construction activities would result in **minor short-term noise impacts.** Long-term operational noise within the area of the Proposed Action would be consistent with medical facilities of similar size. There would be **no significant long-term operational noise impacts.**	None
Land Use	Consultation with the Nashville Department of Codes and Building Safety, Zoning Division for rezoning to construct and operate the OPC may need to occur. Any land use changes would have a **less than significant** impact.	None
Floodplains and Wetlands	The alternatives are not in or adjacent to flood hazard areas, and as such the Proposed Action would not impact floodplains. Due to the absence of wetlands within or adjacent to the proposed alternatives, the Proposed Action would not impact wetlands. **No significant impacts** to floodplains or wetlands are anticipated.	None
Socioeconomics	There would be **short-term beneficial impacts** to local employment and personal income during construction activities.	None

Community Services	Construction activities at the site are not expected to place additional substantial demands on police, fire, emergency services, and other community services, resulting in **no significant impacts.**	None
Solid Waste and Hazardous Material	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, minimization measures would make this potential impact **less than significant.** Waste generated during operation of the outpatient clinic would be collected and disposed of properly. Phase I Environmental Site Assessments revealed no recognized environmental conditions.	None
Traffic, Transportation, and Parking	Project activities are not anticipated to significantly impact existing or future traffic patterns surrounding the Alternatives. Through construction sequencing and coordination with Metropolitan Government of Nashville and Davidson County on short-term road closures during construction, impacts to traffic during construction would be temporary and localized and therefore, **less than significant.** Through coordination and planning, in conjunction with local communities and Nashville Department of Transportation and Multimodal Infrastructure (NDOT), intersection improvements would be developed to mitigate increased traffic volumes and surrounding intersection level of service. Parking for the OPC would be sized to handle the anticipated volume of cars expected to visit the facility on a daily basis with an anticipated 1,100 parking spaces. As a result, impacts to traffic during operational activities would be **less than significant.**	None
Utilities	There would be a negligible increase in the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges. Impacts would be **less than significant.**	None

Agency Coordination and Public Involvement

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

The Draft EA was published for a 30-day review and comment period. VA electronically sent a notice of availability (NOA) to federal, state, and local agencies, Tribes, and community stakeholders, to solicit input on the Draft EA. The NOA for the Draft EA was also published in *The Nashville Tennessean*.

The NOA explained how to obtain the Draft EA electronically from the VA website at http://www.cfm.va.gov/environmental and in print at the Looby Public Library at 2301 Rosa L. Parks Boulevard, Nashville, TN 37228. The NOA explained that comments on the Draft EA were to be sent to vacoenvironment@va.gov.

VA received comments on the Draft EA during the public comment period from the Tennessee Department of Environment and Conservation on November 14, 2025. Comments received during the public comment period are provided in Appendix B.

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Acronyms and Abbreviations

Amsl	above mean sea level
APE	area of potential effects
BCC	migratory birds of conservation concern
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practice
CAA	Clean Air Act
CFR	Code of Federal Regulations
CGP	construction general permit
CWA	Clean Water Act
dBA	A-weighted decibel scale
DSWM	Division of Solid Waste Management
EA	environmental assessment
ESA	Environmental Site Assessment
IPaC	Information for Planning and Consultation
LOS	level of service
MBTA	Migratory Birds Treaty Act
MTA	Metropolitan Transit Authority
MWS	Metro Water Services
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NOA	Notice of Availability
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resources Conservation Service
NRHP	National Register of Historic Places
OPC	Outpatient Clinic
PCB	polychlorinated biphenyls
PM	Particulate Matter
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RPW	Relatively Permanent Waters
SHPO	State Historic Preservation Office

SFHA	Special Flood Hazard Area
SSURGO	Soil Survey Geographic Database
SWCA	SWCA Environmental Consultants
SWPPP	stormwater pollution prevention plan
TDEC	Tennessee Department of Environmental Conservation
TDOA	Tennessee Department of Archaeology
THPO	Tribal Historic Preservation Officer
TN	Tennessee
U&O	use and occupancy
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
VA	U.S. Department of Veterans Affairs
VOCs	Volatile Organic Compounds

1.0 Introduction

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

As required under NEPA, this EA considers input from the public, agencies, and tribes into the federal decision-making process; provides the federal decision-maker with an understanding of potential environmental effects of the decision before making it; identifies measures to reduce potential environmental effects; and documents the NEPA process. At the conclusion of the NEPA process, VA will determine whether this EA supports a Finding of No Significant Impact or necessitates the preparation of an Environmental Impact Statement. This EA presents an analysis of potential impacts to the human environment from the construction and operation of the Proposed Action, as well as impacts of the No Action alternative. An approximately 212,301-square-foot outpatient clinic (OPC) with approximately 1,100 parking spaces is proposed in Nashville, Tennessee (TN). The OPC would employ approximately 430 full-time employees. The project would include ancillary improvements, amenities, and landscaped open space areas. VA is considering the following two locations for the proposed OPC (Figure 1-1):

- 0 (1903) Baptist World Center Drive (Alternative A)
- 0 Ashland City Highway and 0 Clarksville Pike (Alternative B)

1.1 Background

VA currently provides healthcare services to Veterans at three VA clinics in the Nashville area: (1) Charlotte Avenue VA Women Veterans' Clinic, (2) Albion Street VA Clinic, and (3) International Plaza VA Clinic. Additionally, there is a Nashville VA Medical Center. The current space in these facilities is insufficient to meet the future needs of Veterans in the Nashville area. An increasing Veteran population coupled with existing facility patient workload capacities inhibit Veterans from timely access to high-quality healthcare services.

The Charlotte Avenue VA Women Veterans' Clinic and International Plaza VA Clinic offer primary care, mental health care, telehealth, laboratory services, nutrition counseling, and social work services. The Albion Street VA Clinic offers primary care, mental health, social work, and behavioral health services, All three clinics are located south of the Cumberland River, with Charlotte Avenue and Albion Street Clinics located under two miles west of the city center, and the International Plaza Clinic located just above five miles southeast of the city center.

Two existing OPCs would close after the proposed new OPC opens – the Albion Street VA Clinic and the Charlotte Avenue VA Clinic.

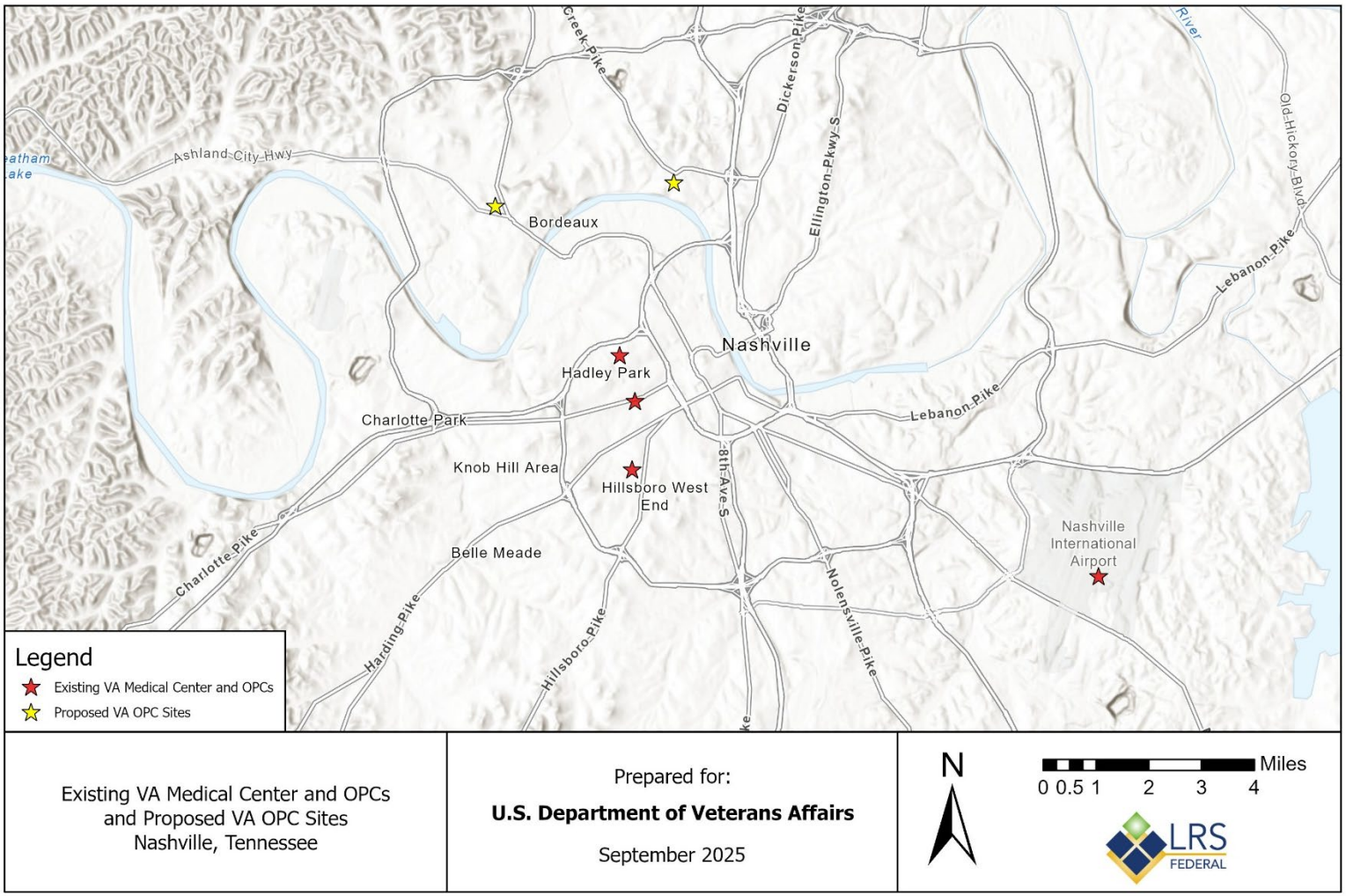
Figure 1-1 depicts the existing VA medical facilities in the Nashville vicinity in addition to OPC site locations being considered.

1.2 Purpose and Need

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

population. The Proposed Action would address current and future projected healthcare capacity, service gaps, and operational inefficiencies.

Veterans make up almost five percent of Nashville's population, justifying the need for expanded VA healthcare facilities in the area. The existing VA clinics in Nashville are limited in space and services provided, split amongst three locations, decreasing efficiency and convenience for Veterans seeking care.



Source:

Esri, NASA, NGA, USGS, Esri Community Maps Contributors, Metro Nashville Gov't, Nashville Davidson Metro Govern, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, Esri, NASA, NGA, USGS, FEMA, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Figure 1-1. Existing VA Medical Center and OPCs and Proposed VA OPC Sites – Site Vicinity Map

2.0 Proposed Action and Alternatives

This section describes the Proposed Action and No Action Alternative considered by VA. After considering several approaches for meeting the purpose and need (Section 1.2), VA elected to acquire a new lease for an OPC with capacity to expand VA provided healthcare services in the Nashville area.

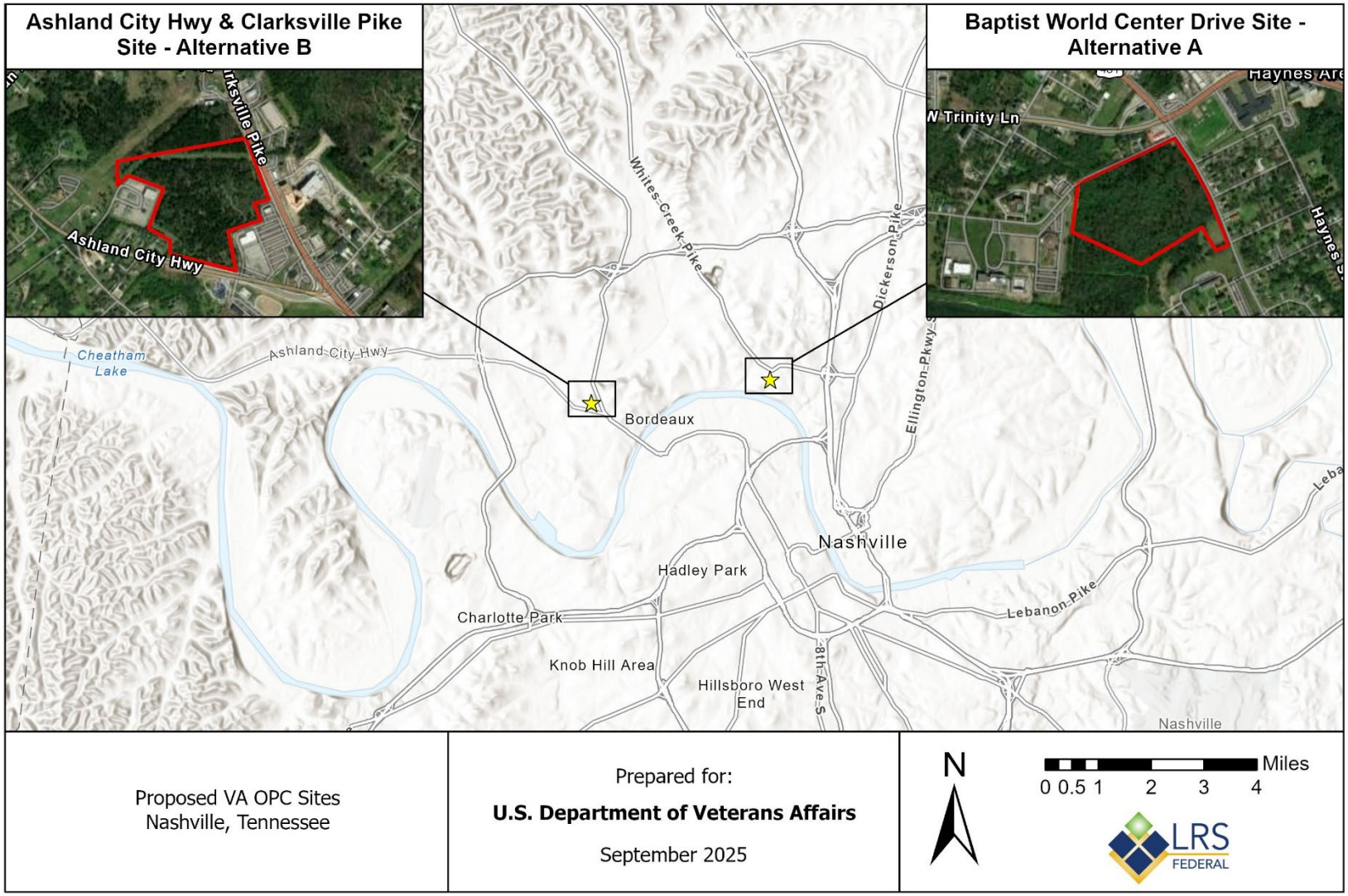
2.1 Proposed Action

VA's Proposed Action is to award a lease to a private entity that would construct an approximately 212,301-square-foot OPC for VA to lease and operate for up to 20 years in Nashville, TN. The proposed VA OPC would be available to Veterans and service members from all branches of the U.S. Armed Forces who meet the criteria for treatment. Operating hours may vary; however, the proposed VA OPC would generally be used Monday through Saturday except on federal holidays between the hours of 7 AM to 7 PM.

The OPC would be designed and built to VA design criteria and in accordance with local building and zoning codes and include other site improvements, amenities, and landscaped open space areas. The proposed OPC would comprise three floors. Project components in addition to the main OPC building would include pedestrian pathways, entry and memorial plazas, gardens, an ambulance pick-up and drop-off area, as well as irrigated landscaping throughout the site. The proposed paved parking would allow for up to 1,100 parking spaces to accommodate employees and approximately 1,600 patients and visitors per day.

The VA is considering two locations for the proposed OPC lease: 0 (1903) Baptist World Center Drive, Nashville, TN; and 0 Ashland City Highway and 0 Clarksville Pike, Nashville, TN (Figure 2-1). The Baptist World Center Drive (Alternative A) preliminary site plan includes a three-story building, ample parking, landscaping around the building and site, a retention pond, an accessible walking path, and reflection areas. The main entrance to the facility would be from Baptist World Center Drive, with service and ambulance entrances from Youngs Lane (Figure 2-2).

The Ashland City Highway and Clarksville Pike (Alternative B) preliminary site plan also includes a three-story building, ample parking, landscaping around the building and site, potential retaining walls, an accessible walking path, an entry plaza with flagpole, and reflection areas. The main entrance to the facility would be from Ashland City Highway, with service and ambulance entrances from Clarksville Pike (Figure 2-3).



Source:

Esri, NASA, NGA, USGS, Esri Community Maps Contributors, Metro Nashville Gov't, Nashville Davidson Metro Govern, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS, Maxar, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Figure 2-1. Alternatives Considered for Proposed VA OPC

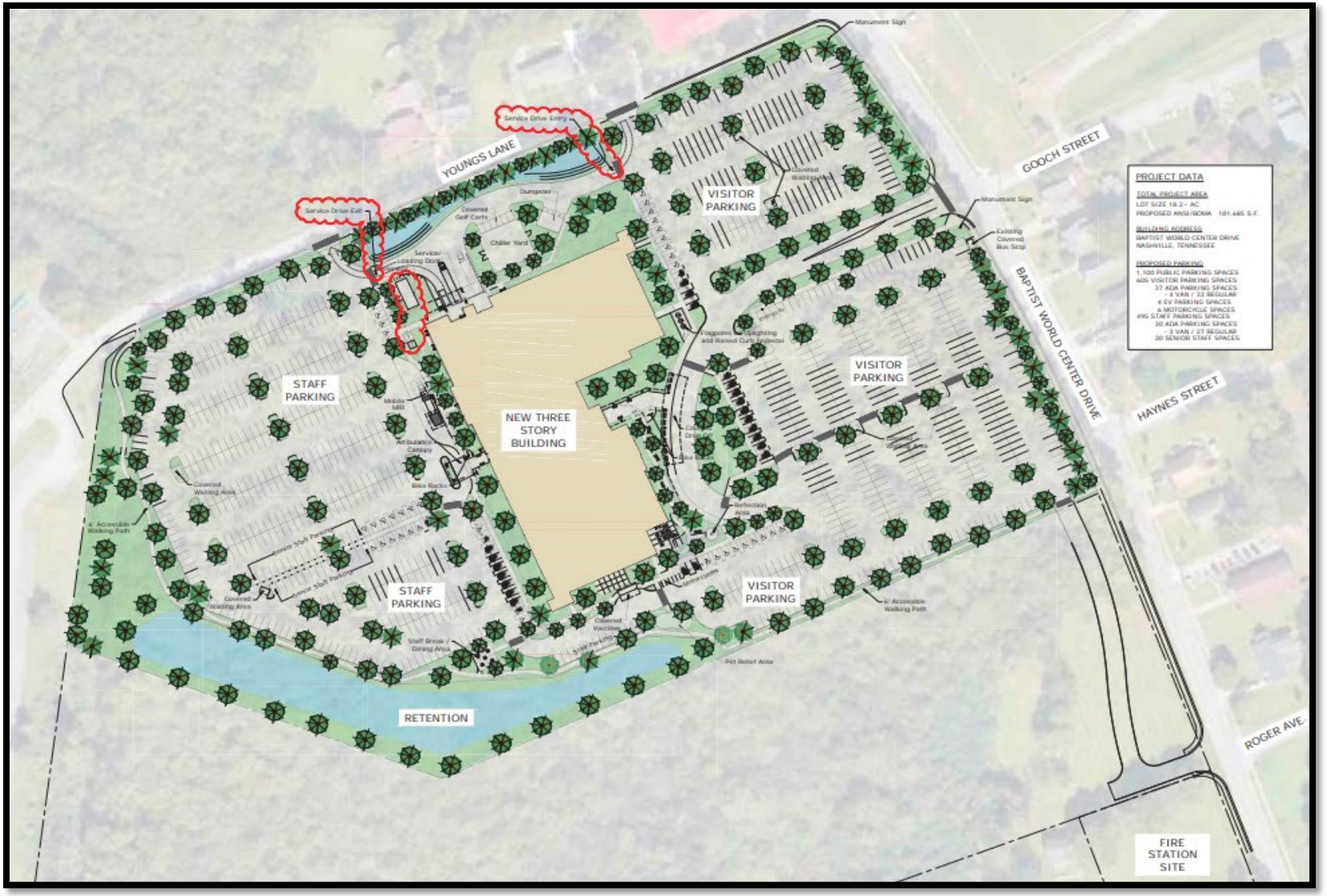


Figure 2-2. Proposed OPC Site Plan for Alternative A

Figure 2-3. Proposed OPC Site Plan for Alternative B

2.2 No Action Alternative

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

3.0 Affected Environment and Environmental Consequences

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

Impacts are identified as either significant or less than significant. The terms "effects" and "impacts" are synonymous in this EA. Where possible, impacts are identified as short-term, temporary, or long-term in relation to the length of the effect.

Resource areas considered in this EA are aesthetics; air quality; cultural and historic resources; geology and soils; hydrology, stormwater, and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services, solid waste and hazardous materials; traffic, transportation, and parking; and utilities. Analysis within this EA further addresses the potential for generating substantial controversy.

VA determined that one resource area was not warranted for further evaluation in this EA. A summary of this resource area and the rationale for not further analyzing, is presented in Table 3-1.

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

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

3.1 Aesthetics

3.1.1 Affected Environment

3.1.1.1 Alternative A

Alternative A is located approximately three miles north of downtown Nashville across the Cumberland River in Davidson County at 0 (1903) Baptist World Center Drive, Nashville, TN. The site consists of unimproved wooded land within a mixed-use neighborhood. The site is surrounded by developed land on all sides except to the south, with residential properties and a retail strip center to the north, residential properties to the east, and the South-Central Conference of 7th Day Adventist to the west. The Cumberland River and American Baptist Seminary are located to the south. The primary access roads in the vicinity of the site are Youngs Lane to the west and Baptist World Center Drive to the northeast.

3.1.1.2 Alternative B

Alternative B is located approximately four miles northwest of downtown Nashville across the Cumberland River in Davidson County at 0 Ashland City Highway and 0 Clarksville Pike, Nashville, TN. The site consists of two parcels of mainly forested land. The site is surrounded by a mixed commercial and residential developed area, bordered by undeveloped land to the north, mixed commercial and residential properties and Ashland City Highway to the south, commercial properties and Clarksville Pike to the east, and a power substation, two churches, and residential properties to the west. The primary

access roads in the vicinity of the site are Clarksville Pike to the east and Ashland City Highway to the south.

3.1.2 Environmental Consequences

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

3.1.2.1 Alternatives A and B

The alternatives would transition from undeveloped and wooded land to a developed site with a three-story OPC. Visual impacts would be minimized by the attractive design of the OPC and landscaping. The OPC is designed as an unimposing facility compatible with the surrounding properties and land uses.

Construction activities temporarily affecting aesthetics may include parked construction equipment, excavation/grading, heavy equipment and contractor vehicles using the adjoining roads, and perimeter control/silt fences surrounding the project area. The presence of construction equipment during the construction of the OPC would have a minor and temporary adverse effect on the visual quality of the area for surrounding residents and church goers for Alternatives A and B, and American Baptist College students for Alternative A. Aesthetic impacts during construction would be temporary and are not considered to represent a significant impact. Impacts on aesthetics as a result of the new OPC would be less than significant.

3.1.2.2 No Action Alternative

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

3.2 Air Quality

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

3.2.1 Affected Environment

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

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

level. An area can either be designated as an *attainment*, *non-attainment*, or *maintenance* area with the NAAQS. All new and existing sources of air pollution are subject to ambient air quality regulation.

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

3.2.1.1 Alternative A

Sensitive air quality receptors in the vicinity of the site include a residential area to the north, a residential area and Haynes Middle School to the east, American Baptist College to the southeast, and Riverside Nashville Church, Greater Christ Temple Church, and FH Jenkins Preparatory School to the west, all within one mile of the site.

3.2.1.2 Alternative B

Sensitive air quality receptors in the vicinity of the site include residential properties to the south, southwest, and north of the site, and The Christian Church of Tennessee to the west, all located less than one mile of the site.

3.2.2 Environmental Consequences

3.2.2.1 Alternatives A and B

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

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

Depending on its fuel source, installation of a heating and/or cooling system in the OPC may require VA to obtain a gas/mechanical permit from the Metropolitan Government of Nashville and Davidson County as per Chapter 16.16 Article III of its Code of Ordinances. Operation of the OPC would have long-term and minor impacts to air quality. Emissions from equipment, such as boilers and generators would generate air pollution. New stationary emergency engines greater than 500 horsepower (HP) as well as natural gas-fired boilers would be installed in accordance with federal regulations under 40 CFR Parts 60 (Standards of Performance for New Stationary Sources) and 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories). It is anticipated that there will be approximately 430 staff and up to 1,600 patients and visitors per day and exhaust from vehicles used by patients and staff would generate air pollution. These emissions would be expected to have a minor impact to air quality.

Regional vehicle emissions related to the OPC would be similar to current. There are also plans to close two existing clinics, resulting in a balance in negligible changes in emissions.

A Title V operating permit is not anticipated to be required for the proposed OPC. Construction and operation of the OPC would result in less than significant impacts to air quality.

3.2.2.2 No Action Alternative

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

3.3 Cultural and Historic Resources

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

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

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

3.3.1 Affected Environment

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

3.3.1.1 Alternative A

Pursuant to the NHPA and its implementing regulations, VA has determined that the APE for the proposed project includes the approximately 22-acre project area of the site, and all areas within a 0.5-mile buffer surrounding the site boundaries.

A review of the TDOA database revealed no cultural resources within the project site, and five within the 0.5-mile APE. Three previously recorded sites have not been evaluated by the Tennessee Historical Commission: a military-frontier station, precontact cemetery, and the currently active Haynes Middle School. The other sites include the Trail of Tears and an historic district that was listed in the NRHP in

2013. The American Baptist Theological Seminary Historic District, located adjacent to and south of Alternative A, comprises 6.65 acres and was nominated at the State level as a significant historic district under Criterion A in the areas of ethnic heritage, education, and religion as an African American theological seminary.

A pedestrian survey investigation was conducted by SWCA Environmental Consultants (SWCA) between October and November 2024 on the proposed project area, revealing nine post-contact structural remains in its northern portion, including concrete foundation and walls, metal roofing, a concrete trough, and post-contact metal can surface scatter, potentially dating from the 1950s to early 1970s. Although qualified as an archaeological site in the State of Tennessee, additional work at this cultural resource has low probability of producing significant new information pertaining to regional history and is therefore recommended not eligible for listing in the NRHP.

A Phase I Archaeological Survey and subsurface shovel testing revealed an isolated find in the site's southwest corner consisting of one lithic chert flake found at a depth ranging from 30 to 40 centimeters below surface. This isolated artifact does not meet the minimum standards to be considered an archaeological site in the State of Tennessee. There is a low probability that additional work at this location will produce significant new information pertaining to regional pre-contact history and is therefore recommended not eligible for NRHP consideration.

The architectural survey identified multiple structures (45-years or older, per TDOA) within the APE, attributed to remains found within the site boundary and the American Baptist Theological Seminary Historic District.

3.3.1.2 Alternative B

Pursuant to the NHPA and its implementing regulations, VA has determined that the APE for the proposed project includes the approximately 21-acre project area, and all areas within a 0.5-mile buffer surrounding the site boundaries.

A review of the TDOA database revealed no cultural resources within the project site, and one within the 0.5-mile APE. This cultural resource represents an open habitation archaeological site from the Archaic and Mississippian periods, not evaluated by the Tennessee Historical Commission.

A pedestrian survey investigation was conducted by SWCA between October and November 2024 on the proposed project area, identifying no above ground historic resources or artifacts.

A Phase I Archaeological Survey and subsurface shovel testing revealed no cultural resources. As a result of the architectural survey, no structures 45-years or older were identified within the APE.

3.3.2 Environmental Consequences

3.3.2.1 Alternatives A and B

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

No cultural resources considered eligible for listing in the NRHP were identified during field investigations conducted in October and November 2024 at either of the alternative locations. The Proposed Action has a low risk for inadvertent discovery of pre-contact or post-contact cultural resources eligible for listing in the NRHP, both below and aboveground. It is therefore unlikely that the Proposed Action would impact archeological resources. Alternative A would not impact historic buildings within the American Baptist Theological Seminary Historic District due to distance from the project site and an extant vegetative buffer. Impacts on cultural resources as a result of the new OPC proposed under both Alternative A and B are anticipated to be less than significant.

VA initiated NHPA Section 106 consultation with the Tennessee Historical Commission and other consulting parties, including representatives of local government and federally recognized Indian tribes (see Sections 5.1 and 5.2 for lists of consulting parties). The Tennessee Historical Commission found that the project as currently proposed would not adversely affect the American Baptist Theological Seminary Historic District, a cultural resource eligible for listing in the NRHP, and had no objection to the implementation of the project as currently planned, as documented in their October 28, 2025 letter (Appendix B). On October 21, 2025, the Nashville Historical Commission raised questions about the property history and remnants of structures located within the proposed parcel for Alternative A during archaeological survey and recommended additional testing and documentation of the location. VA responded that the architectural elements are likely remnants of housing and farm-related structures that supported the adjacent American Baptist Theological Seminary and were likely constructed post-1946 and provided a Phase I Environmental Site Assessment (ESA) conducted by TVG Environmental, which contained additional property history and historical research documentation. On October 23, 2025, the Nashville Historical Commission raised questions over structures identified on a historical map of Davidson County from 1871 that appear to be located adjacent to the Cumberland River. VA informed the Nashville Historical Commission that since these structures are outside of the parcel being considered for lease for the proposed OPC, they were not archaeologically surveyed. No further responses were received during NHPA Section 106 consultation.

If the Proposed Action's scope of work changes from that which was submitted to the consulting parties under Section 106 of the NHPA (Section 5.1), VA will notify the consulting parties of the changes for review and comment. Construction activities would adhere to all federal cultural resource and historic preservation laws and regulations. In the event human remains or other cultural items, as defined by the Native American Graves Protection and Repatriation Act, are found during construction or operation of the OPC, work would be halted in the area, and the appropriate authorities including VA's Federal Preservation Officer, the Tennessee Historical Commission, and federally recognized Indian tribes would be contacted.

3.3.2.2 No Action Alternative

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

3.4 Geology and Soils

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

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

3.4.1 Affected Environment

Radon is an invisible, radioactive gas generated during the breakdown of uranium in rocks and soils and tends to accumulate in below-grade areas of buildings, where the air circulation is restricted. Davidson County is designated as a Zone 1 area for radon, meaning predicted average indoor screening levels are greater than the USEPA's 4.0 pico-Curies per liter action level. Tests conducted over the past several

years by the Davidson County Health Department show wide ranging levels of radon among tested homes in all areas of the county.

3.4.1.1 Alternative A

According to the National Resources Conservation Service (NRCS) Soil Survey Geographic Database (SSURGO), the predominant soil associations found within the vicinity of the project area are the Barfield-Rock outcrop complex and Maury silt loam, with 7 to 20 percent slopes. None of the soil units listed by NRCS within the project site are classified as either prime farmland or farmland of local importance (USDA, 2025).

The project area occurs in Level IV USEPA Ecoregion Outer Nashville Basin, which has rolling and hilly topography, encompassing the outer areas of the generally non-cherty Ordovician limestone bedrock. The Outer Nashville Basin has limestone rocks and soils that are high in phosphorus. The Alternative A site consists mainly of Barfield-Rock outcrop complex, Maury silt loam, Mimosa-Rock outcrop complex, and Mimosa-Urbanland complex soils, as depicted in Figure 3-1.

The USEPA does not recommend soil testing for radon as it is generally not economical and does not rule out the possibility that radon could be problematic inside of a building once constructed. As such, the potential for radon can be addressed through design and construction of passive radon mitigation features. The OPC would be designed and built to VA design criteria as well as local building and zoning codes while incorporating radon-resistant features and construction methods, beginning with subgrade preparation, to mitigate the potential for radon.

Average elevation at the site ranges from approximately 450 feet above mean sea level (amsl) to 500 feet amsl. Topography indicates that the site generally slopes to the south and there are no structural improvements onsite. Impacts to water resources are analyzed in Section 3.6.

3.4.1.2 Alternative B

According to the NRCS SSURGO, the predominant soil association found within the vicinity of the project area is the Barfield-Rock outcrop complex, with 5 to 20 percent slopes. None of the soil units listed by NRCS within the project site are classified as either prime farmland or farmland of local importance (USDA, 2025).

The project area occurs in Level IV USEPA Ecoregion Outer Nashville Basin, which has rolling and hilly topography, encompassing the outer areas of the generally non-cherty Ordovician limestone bedrock. The Outer Nashville Basin has limestone rocks and soils that are high in phosphorus. The Alternative B site consists mainly of Barfield-Rock outcrop complex and Mimosa-Rock outcrop complex, as depicted in Figure 3-2.

As with Alternative A, the OPC under Alternative B would be designed and built to VA design criteria as well as local building and zoning codes while incorporating radon-resistant features and construction methods, beginning with subgrade preparation, to mitigate the potential for radon.

Average elevation at the site ranges from approximately 480 feet amsl to 585 feet amsl. The gradient at the site is generally toward the western and eastern site boundaries with the highest elevation being 582 feet amsl near the center and the lowest points being 480 and 516 feet amsl at the western and eastern portions of the site, respectively. Impacts to water resources are analyzed in Section 3.6.

Figure 3-1. NRCS Soil Types for Alternative A in Nashville, Tennessee

Figure 3-2. NRCS Soil Types for Alternative B in Nashville, Tennessee

3.4.2 Environmental Consequences

3.4.2.1 Alternatives A and B

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

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

The private entity would need to obtain a National Pollutant Discharge Elimination System (NPDES) permit, a Nashville and Davidson County Grading permit, and develop an Erosion and Sediment Control Plan, which would ensure that BMPs such as fugitive dust suppression are included in construction plans. As such, impacts to topography, geology, and soils are expected to be less than significant.

3.4.2.2 No Action Alternative

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

3.5 Hydrology, Stormwater, and Water Quality

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

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

Chapter 6 of the Metropolitan Nashville – Davidson County Stormwater Management Manual Volume 1 – Regulations requires new development and significant redevelopment sites to preserve water quality buffers along Metro's community waters, which include streams, rivers, springs, lakes, ponds, and wetlands. Hydrologic determinations must be done by qualified Metro Water Services (MWS) or TDEC staff either using MWS' Hydrologic Determination Policy or TDEC's *Guidance for Making Hydrologic Determinations* and must be submitted to MWS for review. The Davidson County Stormwater Management Manual also requires riparian buffers for development proposed near streams, ponds, and wetlands. Where MWS' Water Quality Buffer requirements differ from TDEC's CGP requirements, the more restrictive requirement applies.

3.5.1 Affected Environment

The city of Nashville is in the Cumberland River Basin within the Cheatham Lake Watershed. The Cumberland River is 688 miles long, starting in eastern Kentucky on the Cumberland Plateau, flowing southeast into TN and then northwest back into western Kentucky and draining into the Ohio River. Part

of the Cumberland River drainage basin, Cheatham Lake Watershed, is approximately 647 square miles with 773.3 miles of stream and 75,707 acres of lake. According to the USEPA "How's My Waterway?" tool, the portion of the Cheatam Reservoir located within the Cheatham Watershed, and impoundment of the Cumberland River, is classified as impaired due to the presence of polychlorinated biphenyls (PCBs), bacteria, and microbes. This classification has the potential to increase the need for erosion and sediment control planning to avoid significant impacts.

Both alternative site locations are outside of the Special Flood Hazard Area (SFHA) which is further discussed in Section 3.9.

3.5.1.1 Alternative A

Alternative A is in the Cumberland River-Browns Creek sub-watershed of the Cheatham Lake Watershed. The site is approximately 705 feet north of the impaired Cumberland River. The general hydrologic gradient at the site is to the south. During field investigations conducted by SWCA in October of 2024, one non-jurisdictional ephemeral watercourse was identified that runs from north to south along the southeastern portion of the site (SWCA, 2025). According to the USDA Web Soil Survey, the site's approximate depth to the water table is more than 80 inches.

In accordance with TDEC's CGP, temporary water quality buffer zones are required for active construction. For all jurisdictional streams adjacent to or within a construction site, an average 30-foot buffer is required under the TDEC CGP. Impaired streams require a 60-feet buffer under the TDEC CGP. The Davidson County Stormwater Management Manual requires buffers for intermittent and perennial streams as well as wetlands. MWS' Water Quality Buffer requirements and TDEC's CGP temporary water quality buffer zones would not apply.

A stormwater retention facility in the southern portion of the site would be constructed to manage stormwater runoff from the proposed parking lot, OPC building, and adjacent roadways. The stormwater retention facility would capture runoff from storm events via surface flow and inlets throughout the proposed parking area and would reduce the potential risk of contaminants directly entering the downstream watershed.

3.5.1.2 Alternative B

Alternative B is in the Whites Creek sub-watershed of the Cheatham Lake Watershed. The site is located approximately 4,450 feet northwest of the Cumberland River and less than a mile from Whites Creek and Eaton Creek on its north and west sides, respectively. The general hydrologic gradient at the site is to the west. According to the USDA Web Soil Survey, the site's approximate depth to the water table is more than 80 inches. Whites Creek is considered impaired for aquatic life due to excessive amounts of nitrogen and phosphorus present in the waterway.

Similar to Alternative A, no buffer zones or water quality buffer requirements would apply under Alternative B due to the distance between the site and nearby wetlands and streams.

A stormwater management facility would be incorporated into site design to manage stormwater runoff from impervious surfaces including the parking lot, OPC building, and adjacent roadways. The stormwater management facility would capture runoff from storm events via surface flow and inlets throughout the proposed parking area and would reduce the potential risk of contaminants entering the watershed.

3.5.2 Environmental Consequences

3.5.2.1 Alternatives A and B

Construction activities at both alternative locations such as site preparation, grading, movement of heavy equipment, and paving of parking areas, could temporarily increase sedimentation and erosion. These activities would expose soil surfaces and could increase the potential for sedimentation and surface runoff. Implementation of measures from the approved erosion and sediment control plan, the required Tennessee-issued NPDES permit, and the SWPPP would minimize erosion and sedimentation impacts. The NPDES permit and SWPPP identify potential stormwater contaminants and address how to minimize stormwater pollution. The SWPPP would contain BMPs designed to minimize stormwater pollution such as temporary construction entrances, silt fences, inlet protection, ditch checks, slope protection, and sediment barriers.

The OPC would be a slab-on-grade building and would be connected to the municipal water supply. Although unlikely, if shallow groundwater is encountered during construction, appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems, would be implemented.

Impervious surfaces include the approximately 212,301-square-foot OPC building, surrounding pavement for 1,100 public parking spaces, entrance roadways, and loading areas. During operation of the OPC, the impervious and hardened surfaces, such as the outpatient facility, parking areas, and other paved areas, would increase surface runoff with the potential for erosion and sedimentation. However, landscaping and vegetation cover and the stormwater controls designed for the OPC would reduce these effects. Landscaping and vegetation cover would stabilize soil and prevent long-term erosion and sedimentation. The stormwater system would capture runoff from storm events via inlets throughout the proposed parking area and reduce the potential risk of contaminants entering the watershed.

A retention pond is proposed for the southern portion of the project area for Alternative A (Figure 2-1). The retention pond would provide storage capacity to attenuate surface runoff during rainfall events, with the additional opportunity to provide aesthetic, amenity and ecological benefits to the local landscape.

Therefore, the construction and operation of the OPC would have less than significant impacts to hydrology, stormwater, and water quality. Potential impacts to wetland areas are described in Section 3.9.

3.5.2.2 No Action Alternative

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

3.6 Wildlife and Habitat

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

3.6.1 Affected Environment

3.6.1.1 Federal- and State-Listed Species for Alternatives A and B

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

The U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system data, the USFWS Critical Habitat Portal, and the TDEC Division of Natural Areas Rare Species by Quadrangle review were all utilized to identify critical habitat and/or special-status species with potential to occur in the project area. Additionally, SWCA conducted a field reconnaissance of the project area of Alternative A and Alternative B on October 30, 2024, to support an Endangered Species Act Biological Survey Review and Habitat Assessment.

Alternative A

The USFWS IPaC database and Critical Habitat Portal identified one (1) Federally threatened, six (6) Federally endangered, one (1) proposed endangered, one (1) experimental population, non-essential, and one (1) proposed threatened species with potential to occur in the project area. The TDEC Division of Natural Areas Rare Species review identified six (6) State-listed species that are not Federally-listed (Table 3-2). There are no critical habitats within the project boundaries.

Alternative B

The USFWS IPaC database and Critical Habitat Portal identified one (1) Federally threatened, seven (7) Federally endangered, one (1) experimental population, non-essential, one (1) proposed threatened, and one (1) proposed endangered species with potential to occur in the project area. The TDEC Division of Natural Areas Rare Species review identified two (2) State-listed species that are not Federally-listed (Table 3-2). There are no critical habitats within the project boundaries.

3.6.1.2 Migratory Birds of Conservation Concern for Alternatives A and B

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

The following BCC species, which are afforded protection under the MBTA, have potential to occur within the project area of Alternatives A and B:

- Chimney Swift (*Chaetura pelagica*)
- Field Sparrow (*Spizella pusilla*)
- Lesser Yellowlegs (*Tringa flavipes*)
- Prairie Warbler (*Setophaga discolor*)
- Prothonotary Warbler (*Protonotaria citrea*)
- Red-headed Woodpecker (*Melanerpes erythcephalus*)

- Rusty Blackbird (*Euphagus carolinus*)
- Semipalmated Sandpiper (*Calidris pusilla*)
- Wood Thrush (*Hylocichla mustelina*)

The USFWS IPaC identified Bald Eagles as having potential to occur in the project area of Alternatives A and B. The Bald Eagle Mapper was consulted and determined there are no bald eagle nests within one mile of either alternative site. Bald Eagles are protected under both the MBTA and the Bald and Golden Eagle Protection Act (BGEPA). The BGEPA prohibits the take, possession, and transportation of bald and golden eagles or their parts, eggs, or nests without authorization (16 USC 668–688(d)). The USFWS may issue permits to take bald or golden eagles or their nests for certain activities, provided the taking is compatible with the preservation of these species (50 CFR Part 22).

3.6.1.3 Vegetation and Ground Cover

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

Alternative A

The Alternative A site consists of undeveloped wooded land surrounded by developed land on all sides except to the south. The site is dominated by deciduous forest, followed by mixed forest, developed open space, developed low intensity, and developed medium intensity.

Two non-wetland/upland vegetation community types were identified by SWCA. The canopy of the forested area is dominated by Eastern red cedar. Amur honeysuckle was found to be the dominant shrub species, and Burning bush the dominant herbaceous canopy species (SWCA, 2025).

Alternative B

The Alternative B site consists of undeveloped wooded land surrounded by vegetated land to the north and developed land on all other sides. The site is dominated by evergreen forest, followed by mixed forest, developed open space, deciduous forest, developed low intensity, pasture/hay, barren land, and developed medium intensity.

Two non-wetland/upland vegetation community types were identified by SWCA. The canopy of the forested area is dominated by Eastern red cedar, and Chinese privet was found to be the dominant shrub species (SWCA, 2025).

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

Common Name (*Scientific Name*)	Status	Alternative	Range or Habitat Requirements	Potential For Occurrence in Project Area
Amphibians				
Streamside Salamander (*Ambystoma barbouri*)	SP	B only	Found in scattered populations across middle Tennessee. Adults are typically found beneath rocks and debris in streams with limestone bedrock.	Does not occur. This species preferred habitat consisting of streams with limestone bedrock does not occur within the Proposed Action sites.

Birds				
Bald Eagle (*Haliaeetus leucocephalus*)	BGEPA, MBTA, SP	A and B	Ranges throughout North America and is a year-round resident in Tennessee. Breeds in forested areas near large bodies of water. Bald Eagles winter on reservoirs and large rivers in Tennessee. Nest in tall trees or cliffs near water, with breeding pairs typically returning to the same nest annually. In Tennessee, egg laying peaks in late February	Unlikely to occur. Although there were tall trees observed within and bordering the Proposed Action sites; the sites are heavily developed/residential. No large rivers or lakes are present within the Proposed Action sites. The Bald Eagle Mapper was consulted and determined there are no bald eagle nests within 1 mile of the Proposed Action sites. No nests or individuals were observed during the field reconnaissance survey.
Whooping Crane (*Grus americana*)	EPNE	A and B	This species relies on shallow marshes and adjacent open grasslands. Whooping cranes will use a variety of habitats during migration and feeding, predominantly in palustrine or riverine wetland systems but also in lacustrine wetlands, agricultural fields, and flooded croplands. USFWS suggests landscapes characterized as "wetland mosaic" provide the most suitable migration stopover habitat. This species is considered rare migrant and winter resident in Middle and East Tennessee.	Unlikely to occur. Although the Alternative sites are within the range for this species, there are no known occurrences within 10 miles of the Proposed Action sites, and suitable habitat is not present within the Proposed Action sites. No individuals were observed during the field survey.
Clams				
Cumberland Combshell	SP	A only	Occurs within the shoals and riffles of medium-sized	Does not occur. No streams or rivers occur

(*Epioblasma brevidens*)			streams to large rivers with coarse sand, gravel, cobble, and boulder substrates.	within the Proposed Action site.
Orangefoot Pimpleback (*Plethobasus cooperianus*)	SP	A only	Occurs within the shoals and riffles of medium to large rivers with sand, gravel, and cobble substrates.	Does not occur. No rivers occur within the Proposed Action site.
Pink Mucket (*Lampsilis abrupta*)	FE, SP	A and B	Found in the shoals and riffles of major rivers and tributaries that are free of silt, with mud and sand substrates.	Does not occur. No rivers occur within the Proposed Action sites.
Fish				
Blue Sucker (*Cycleptus elongatus*)	SP	A only	Occurs within moderate flowing channels and pools of large rivers and lower parts of major tributaries.	Does not occur. No rivers occur within the Proposed Action site.
Lake Sturgeon (*Acipenser fulvescens*)	SP	A only	Occurs at the bottoms of large freshwater rivers and lakes. Preferred substrates include firm sand, gravel, and rock.	Does not occur. No rivers or lakes occur within the Proposed Action site.
Insects				
Monarch Butterfly (*Danaus Plexippus*)	PT	A and B	Overwinter in the mature oyamel fir forests in the mountains of central Mexico. In March, they travel to the northern United States and Canada. Pine, fir, and cedar trees are often chosen for roosting. During the breeding season, they are typically found in open grassy areas, laying their eggs exclusively on the milkweed plant. Milkweed plants can be found in a wide range of habitats, including, but not limited to, prairies, fields, open woodlands, and roadsides.	Unlikely to occur. No common milkweed (*Asclepias syriaca*) was observed within the Proposed Action sites. The Proposed Action sites fall within the species' summer migration corridor (USDA USFS 2024); however, no individual monarchs were observed during the field survey and surrounding areas are predominately developed.

Mammals				
Gray Bat (*Myotis grisescens*)	FE	A and B	Gray bats occupy caves or cave-like structures year-round. While gray bats prefer caves, summer colonies have been documented using dams, mines, quarries, concrete box culverts, and the undersides of bridges. Summer caves must be warm or have restricted rooms that can trap the body heat of clustered bats.	Unlikely to Occur. No caves or sinkholes were identified within the Proposed Action sites. There is no known occurrence of this species within the 8-digit HUC code for the Proposed Action sites.
Northern Long-eared Bat (*Myotis septentrionalis*)	FE	B only	This species uses forested areas for roosting, foraging, and commuting between summer and winter habitat. Preferred habitat includes areas with a dense growth of trees and underbrush covering a large tract and a natural chamber or series of chambers in the earth or on the side of a hill or cliff. In winter, individuals hibernate in caves and abandoned mines, often with other species of bats.	May occur. Suitable habitat or potential roosting trees were observed within the Proposed Action site. No caves or sinkholes were identified within the Proposed Action site. The Proposed Action site contains marginal suitable forested habitat for this species. There are no known occurrences of this species within the 8-digit HUC code for the Proposed Action site.
Tri-colored Bat (*Perimyotis subflavus*)	PE	A and B	This species occupies a wide variety of habitats, including caves, mines, and rock crevices during the winter and small caves, hollow trees, under tree bark, brush piles, buildings, culverts, and artificial roosting boxes during non-winter months.	May occur. Suitable habitat or potential roosting trees were observed within the Proposed Action sites. No caves or sinkholes were identified within the Proposed Action sites. The Proposed Action sites contain potential suitable forested habitat for this species. There are no known occurrences of this species within the

				8-digit HUC code for the Proposed Action sites.
Plants				
Braun's Rock-cress (*Arabis perstellata*)	FE	A and B	Typically found on shady, north-facing wooded slopes of limestone outcrops. Known to occur within areas scoured by erosion, trails created by humans or wildlife, and at the base of large trees where there is little competition.	Unlikely to occur. This species preferred habitat is not present within the Proposed Action sites. No individuals were observed during field survey.
Guthrie's Ground Plum (*Astragalus bibullatus*)	FE	A and B	Occurs within limestone cedar glade ecosystems in the Middle Tennessee Central Basin. Prefers soils depths greater than 5 cm and partial shade from small trees and shrubs.	Unlikely to occur. This species is known only to occur in cedar glades that are not present within the Proposed Action sites. No individuals were observed during field survey.
Leafy Prairie-clover (*Dalea foliosa*)	FE	A and B	Requires periodic fire, full sun, and low competition for optimal growth. Occurs with wet calcareous barrens, moist prairies, and cedar glades near streams or limestone seeps.	Unlikely to occur. This species preferred habitat is not present within the Proposed Action sites. No individuals were observed during the field survey.
Price's Potato-bean (*Apios priceana*)	FT	A and B	This species occurs in open woods and along wood edges in limestone areas. Some populations have also been observed growing along highway rights-of-way and powerline corridors. This species prefers soils that are well-drained loams on old alluvium or over limestone. This species typically occurs under mixed hardwoods or in associated forest clearings, often where bluffs or ravine	Unlikely to occur. There was no suitable habitat observed within the Proposed Action sites. No individuals were observed during the field survey.

			slopes meet creek or river bottoms.	
Sand Grape (*Vitis rupestris*)	SP	A only	Occurs on calcareous or gravelly river bottoms, banks, stream beds, washes, limestone glades, and scoured boulders and cobbles.	Unlikely to occur. This species preferred habitat is not present within the Proposed Action site. No individuals were observed during field survey.
Short's Bladderpod (*Physaria globosa*)	FE, SP	A and B	This species prefers dry, open limestone ledges on river bluffs, talus of lower bluff slopes, and shale at cliff bases. This species can be found on rocky slopes and the tops, ledges, or bases of steep cliffs along major waterways such as the Cumberland River. They may also be present on thin, calcareous soils in cedar glades. This species has also been observed on roadcuts downhill from natural or semi-natural bluffs.	Unlikely to occur. This species is known only to occur on open limestone ledges on river bluffs and in cedar glades that are not present within the Proposed Action sites. No individuals were observed during field survey.
Federal Status: BGEPA = Bald Eagle Protection Act, EPNE = Experimental Population, Non-Essential, FC = Federal Candidate, FE = Federal Endangered, FT = Federal Threatened, PE = Proposed Endangered, PT = Proposed Threatened; Tennessee State Status: SP = State Protected				

3.6.2 Environmental Consequences

3.6.2.1 Alternatives A and B

Incidental mortality or displacement of individual birds protected under the MBTA is not expected to occur due to construction disturbance (e.g., vegetation removal, noise). Mobile individuals (e.g., adults) would be expected to move to adjacent habitats in response to habitat loss or disturbance. In advance of any proposed tree clearing between March 1 to September 30, the private entity would be required to conduct a pre-construction clearance survey to determine the presence/absence of nesting MBTA birds, and coordinate with USFWS to determine the potential need for non-disturbance buffers or other mitigation. The private entity would be responsible for implementing any buffers or mitigation required by USFWS.

VA's effect determinations for Special Status Species are shown in Table 3-3.

Alternative A Listed Bat Species

Based upon IPaC submissions and the standing analysis completed by USFWS, VA determined the Proposed Action under Alternative A meets the criteria for a "*not likely to adversely affect"* determination for the tri-colored bat.

Tri-colored Bat

As indicated on VA's IPaC submissions, the *"not likely to adversely affect"* determination for the tri-colored bat is contingent upon the following USFWS conservation measure to reduce potential impacts:

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

A letter recording VA's determination for Alternative A was provided by USFWS on September 16, 2025 (Appendix B). The USFWS letter received further verifies that consultation for the Tricolored Bat is complete unless the USFWS advises within 15 days that the determination is incorrect. No further correspondence has been received from USFWS regarding Alternative A. Additionally, no further action under Alternative A will be necessary unless either of the following occurs:

- New information reveals effects of the action that may affect the northern long-eared bat or tri-colored bat in a manner or to an extent not previously considered; or,
- The identified action is subsequently modified in a manner that causes an effect to the northern long-eared bat or tri-colored bat that was not considered when completing the USFWS determination key.

Alternative B Listed Bat Species

Based upon IPaC submissions and the standing analysis completed by USFWS, VA determined the Proposed Action under Alternative B meets the criteria for a *may affect, not likely to adversely affect determination* for the northern long-eared bat and tri-colored bat. Through the implementation of the following conservation measures and BMPs recommended by USFWS, Alternative B is not likely to adversely affect tri-colored bats or northern long-eared bats.

Northern Long-eared Bat

The USFWS provides conservation measures to reduce potential impacts to the northern long-eared bat, which will include the following time-of-year restriction:

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

The USFWS further provides the following BMP recommendations to reduce potential impacts to the northern long-eared bat:

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

Tri-colored Bat

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

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

The USFWS further provides the following BMP recommendations to reduce potential impacts to the tri-colored bat:

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

The USFWS letters recording VA's determination of effect for the Proposed Action under Alternative B are provided in Appendix B. A project review request was submitted to the USFWS Tennessee Ecological Field Office on September 26, 2025, for Alternative B to obtain concurrence with the effect determinations (*may affect, not likely to adversely affect*) for the northern long-eared bat and tri-colored bat. USFWS concurrence of VA's determinations was received on September 29, 2025, as shown in Table 3-3, are provided in Appendix B.

Table 3-3. Effect Determinations for Special Status Species

Common Name (Scientific Name)	Status	Alternative	Effect Determination
Streamside Salamander (*Ambystoma barbouri*)	SP	B only	No effect
Bald Eagle (*Haliaeetus leucocephalus*)	BGEPA, MBTA, SP	A and B	Unlikely to cause a take
Whooping Crane (*Grus americana*)	EPNE	A and B	No effect
Cumberland Combshell (*Epioblasma brevidens*)	SP	A only	No effect
Orangefoot Pimpleback (*Plethobasus cooperianus*)	SP	A only	No effect
Pink Mucket (*Lampsilis abrupta*)	FE, SP	A and B	No effect
Blue Sucker (*Cycleptus elongatus*)	SP	A only	No effect
Lake Sturgeon (*Acipenser fulvescens*)	SP	A only	No effect
Monarch Butterfly (*Danaus Plexippus*)	PT	A and B	No effect
Gray Bat (*Myotis grisescens*)	FE	A and B	No effect
Northern Long-eared Bat (*Myotis septentrionalis*)	FE	B only	May affect, not likely to adversely affect
Tri-colored Bat (*Perimyotis subflavus*)	PE	A	Not likely to adversely affect
		B	May affect, not likely to adversely affect
Braun's Rock-cress (*Arabis perstellata*)	FE	A and B	No effect
Guthrie's Ground Plum (*Astragalus bibullatus*)	FE	A and B	No effect

Leafy Prairie-clover (*Dalea foliosa*)	FE	A and B	No effect
Price's Potato-bean (*Apios priceana*)	FT	A and B	No effect
Sand Grape (*Vitis rupestris*)	SP	A only	No effect
Short's Bladderpod (*Physaria globosa*)	FE, SP	A and B	No effect
Federal Status: BGEPA = Bald Eagle Protection Act, EPNE = Experimental Population, Non-Essential, FE = Federal Endangered, FT = Federal Threatened, PE = Proposed Endangered; PT = Proposed Threatened, Tennessee State Status: SP = State Protected			

3.6.2.2 No Action Alternative

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

3.7 Noise

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

The Noise Control Act of 1972, with its subsequent amendments (Quiet Communities Act of 1978, 42 U.S.C. § 4901-4918), delegates to the States the authority to regulate environmental noise and directs government agencies to comply with local community noise statutes and regulations. Chapter 9.30.010 of the Metropolitan Government of Nashville and Davidson County, Tennessee Code of Ordinances, no outdoor construction, repair or demolition of buildings, structures, land, driveways, or appurtenances thereto is lawful between 7:00 pm and 7:00 am except for the months of June through August, during which the restriction is between 8:00 pm and 6:00 am. Outdoor construction of utility and road work, hauling and hoisting of large roads, and transporting and unloading of construction materials other than blast materials between 5:00 am and 7:00 pm are exempt from this ordinance.

3.7.1 Affected Environment

3.7.1.1 Alternative A

The primary noise sources in the vicinity of the proposed site for Alternative A are US-413 and the surrounding two-lane roads, Youngs Lane and Baptist World Center Drive.

Sensitive noise receptors in the vicinity of the proposed site include a residential area to the north, a residential area and Haynes Middle School to the east, American Baptist College to the southeast, and Riverside Nashville Church, Greater Christ Temple Church, and FH Jenkins Preparatory School to the west.

3.7.1.2 Alternative B

The primary noise sources in the vicinity of the proposed site for Alternative B are Clarksville Pike/US-41 adjacent to the eastern side of the site and Ashland City Highway to the west of the site.

Sensitive noise receptors in the vicinity of the proposed site include residential properties to the south and southwest, and the Disciples of Christ Christian Church located west of the site.

3.7.2 Environmental Consequences

3.7.2.1 Alternatives A and B

The Alternatives would be expected to have minor, short-term and negligible, long-term, adverse effects on sensitive noise receptors.

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

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

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

3.7.2.2 No Action Alternative

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

3.8 Land Use

3.8.1 Affected Environment

3.8.1.1 Alternative A

The Alternative A site consists of approximately 22 acres of unimproved wooded land within a mixed-use neighborhood. The site is surrounded by developed land on all sides except to the south, with residential properties and a retail strip center to the north, residential properties to the east, and the South-Central Conference of 7th Day Adventist to the west. The Cumberland River and American Baptist Seminary are located to the south.

The Alternative A site is zoned as R6 or Medium Density Residential, which requires a minimum 6,000-square-foot lot and is intended for single and two-family dwellings at a density of 7.71 dwelling units per acre (Nashville Planning Department). Zoning for Alternative A can be seen in the Zoning Map below (Figure 3-3).

3.8.1.2 Alternative B

The Alternative B site consists of two parcels of land, one that is approximately 18 acres and another that is approximately 2 acres, totaling about 21 acres of undeveloped land. The site is surrounded by a mixed commercial and residential developed area, bordered by undeveloped land to the north and south, commercial properties to the east, and power substation and residential properties to the south and southwest.

The Alternative B site is zoned as SP or Specific Plan district, which has a designated site plan that determines the density, building layout, and street layout for the site (Nashville Planning Department, 2022). Zoning for Alternative B can be seen in the Zoning Map below (Figure 3-3).

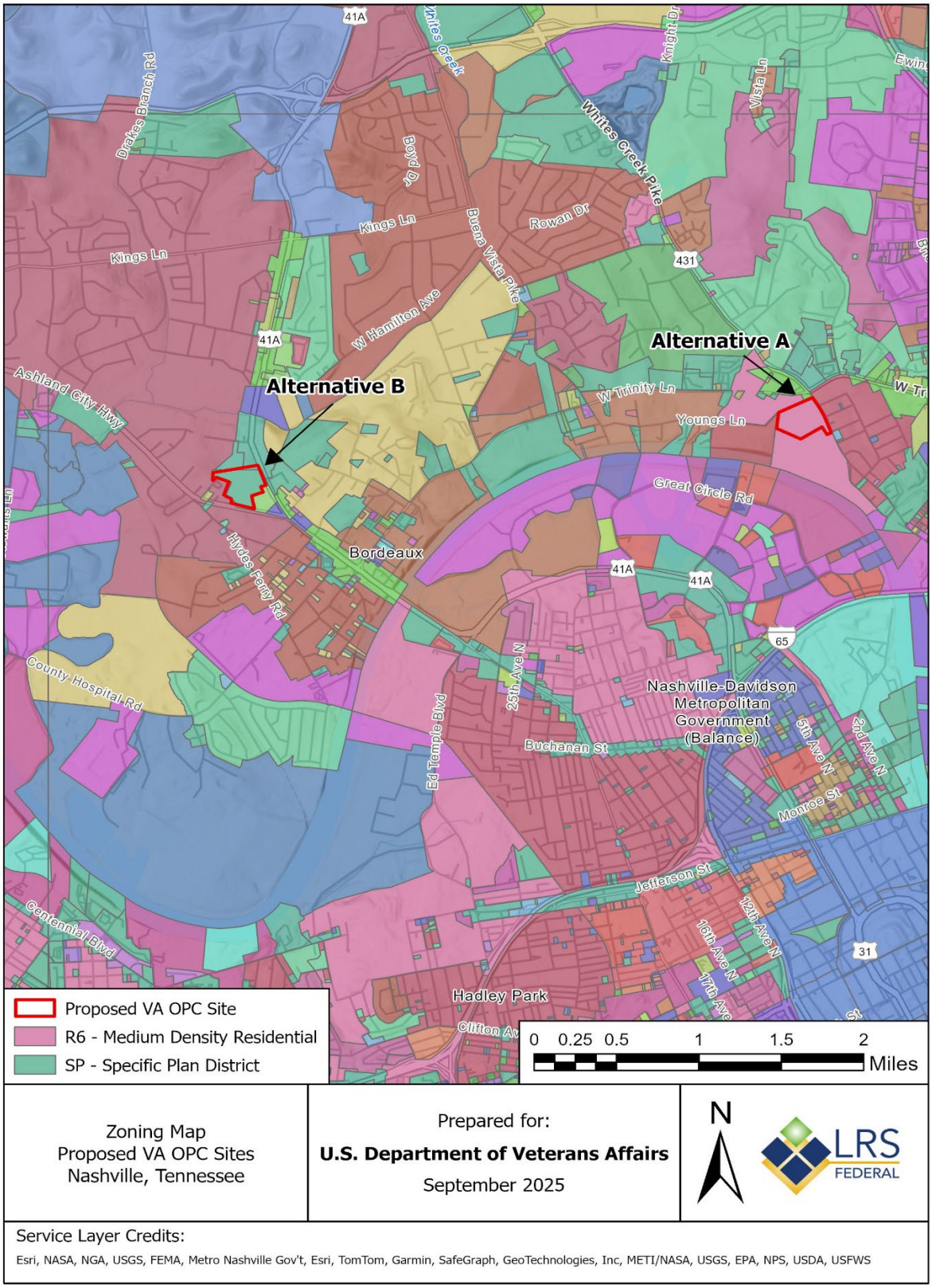


Figure 3-3. Zoning Map of Alternative Site Locations

3.8.2 Environmental Consequences

3.8.2.1 Alternative A

Construction of the Proposed Action may have a minor impact on land use. According to the Nashville Planning Department, the proposed site for Alternative A is zoned R6 or Medium Density Residential, which is defined as intended to provide for higher intensity one-family and two-family development by the Nashville and Davidson County Code of Ordinances.

Any aerial, underground, or above ground encroachments onto a Nashville Department of Transportation or Nashville metropolitan right-of-way would require encroachment permits prior to construction per Chapter 13.16 of the Metropolitan Government of Nashville and Davidson County Code of Ordinances. Additionally, per Chapter 13.20.020 of the Metropolitan Government of Nashville and Davidson County Code of Ordinances, an Excavation or Obstruction Permit would be required for any construction related excavation or obstruction in a public right-of-way.

Re-zoning of the proposed site would be necessary, which would require consultation with the Nashville Department of Codes and Building Safety, Zoning Division. However, no significant impact to land use is anticipated under Alternative A.

3.8.2.2 Alternative B

Construction of the Proposed Action may have a minor impact on land use. According to the Nashville Planning Department, the proposed site for Alternative B is zoned SP or Specific Plan District, which is defined as intended to implement the context sensitive development and land use compatibility provisions of the general plan for all land use policies by the Nashville and Davidson County Code of Ordinances.

Similar to Alternative A, appropriate encroachment permits and Excavation or Obstruction Permits would be obtained prior to construction under Alternative B.

Re-zoning of the proposed site may be necessary, which would require consultation with the Nashville Department of Codes and Building Safety, Zoning Division. However, no significant impact to land use is anticipated under Alternative B.

3.8.2.3 No Action Alternative

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

3.9 Floodplains and Wetlands

3.9.1 Affected Environment

3.9.1.1 Floodplains

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

Alternative A

The Alternative A site is within Flood Zone X, an area of minimal flood hazard. Alternative A is not within a Special Flood Hazard Area (SFHA); however, the site is located approximately 700 feet north of the Cumberland River, which is designated as a Regulatory Floodway. The associated Zone AE, SFHA (1-percent annual chance of flood, 100-year floodplain) extends from the Cumberland River into the wooded area approximately 420 feet south of the site. The 500-year floodplain (0.2-percent annual chance

of flood) is located approximately 390 feet south of the site (Figure 3-4). The elevation difference between the Zone AE, SFHA associated with the Cumberland River and the existing site grade is approximately 30 feet.

Alternative B

The Alternative B site is within Flood Zone X, an area of minimal flood hazard. Alternative B is not within a SFHA and is approximately 1,525 feet from Whites Creek located to the north (Figure 3-5). The associated Zone AE, SFHA and 500-year floodplain that extend from Whites Creek are located approximately 1,250 feet from the site. The elevation difference between the Zone AE, SFHA associated with Whites Creek and the existing site grade is approximately 36 feet.

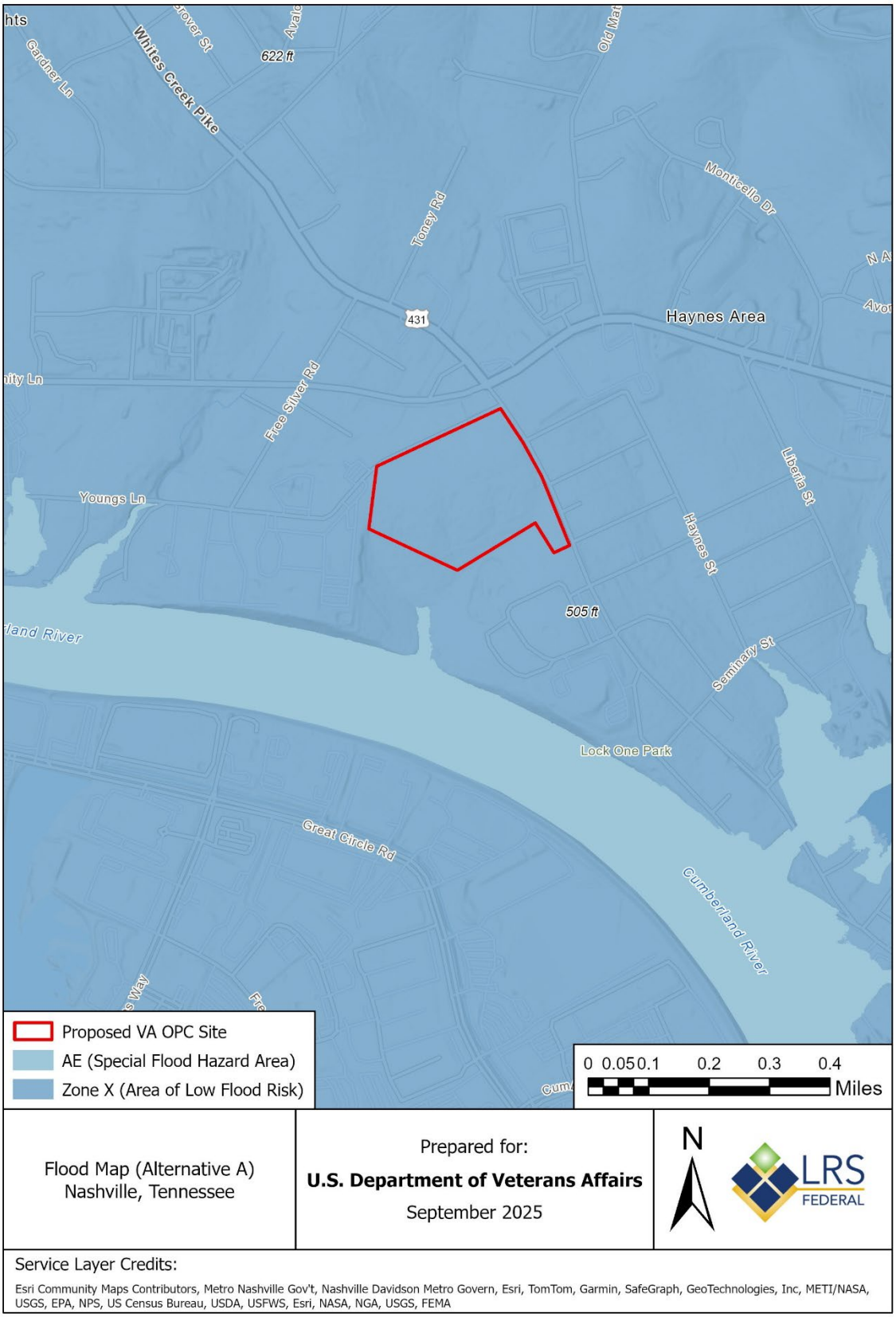


Figure 3-4. Flood Hazard Map for Alternative A

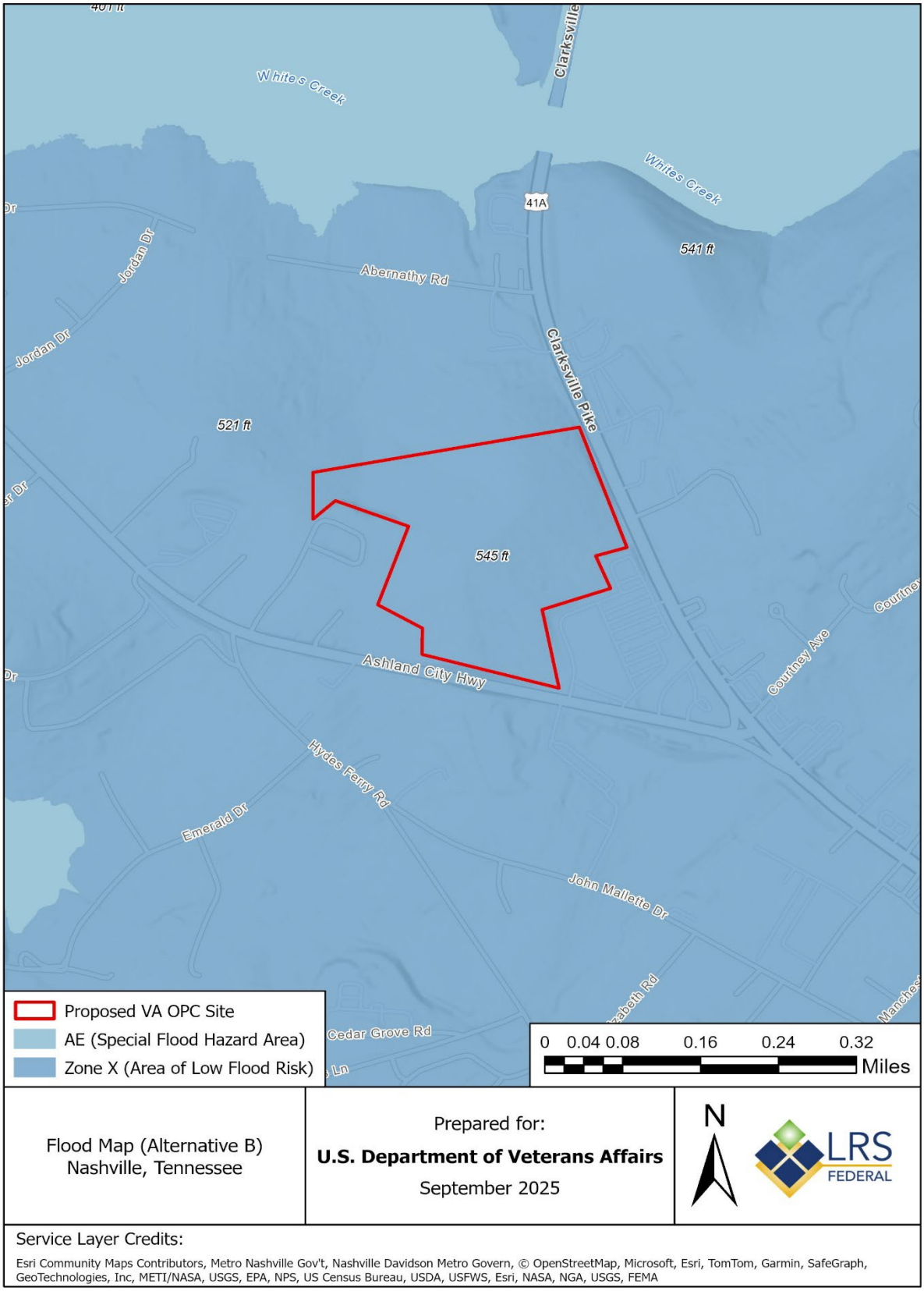


Figure 3-5. Flood Hazard Map for Alternative B

3.9.1.2 Wetlands and Other Water Resources

Jurisdictional Waters of the United States, including streams and wetlands, are defined by 33 CFR 328.3 and are protected by Section 404 of the CWA (33 U.S.C. 1344), which is administered and enforced by the U.S. Army Corps of Engineers (USACE).

Alternatives A and B

According to the USFWS National Wetlands Inventory, no wetlands are present within or adjacent to the proposed site for Alternative A or B, as seen in Figure 3-6. No wetlands or other potential Waters of the United States/Waters of the State were observed during field reconnaissance surveys conducted in October 2024 (SWCA, 2025). A non-jurisdictional ephemeral watercourse was identified by SWCA that runs from north to south along the southeastern portion of the Alternative A site, which lacks surface connection to Relatively Permanent Waters (RPWs).

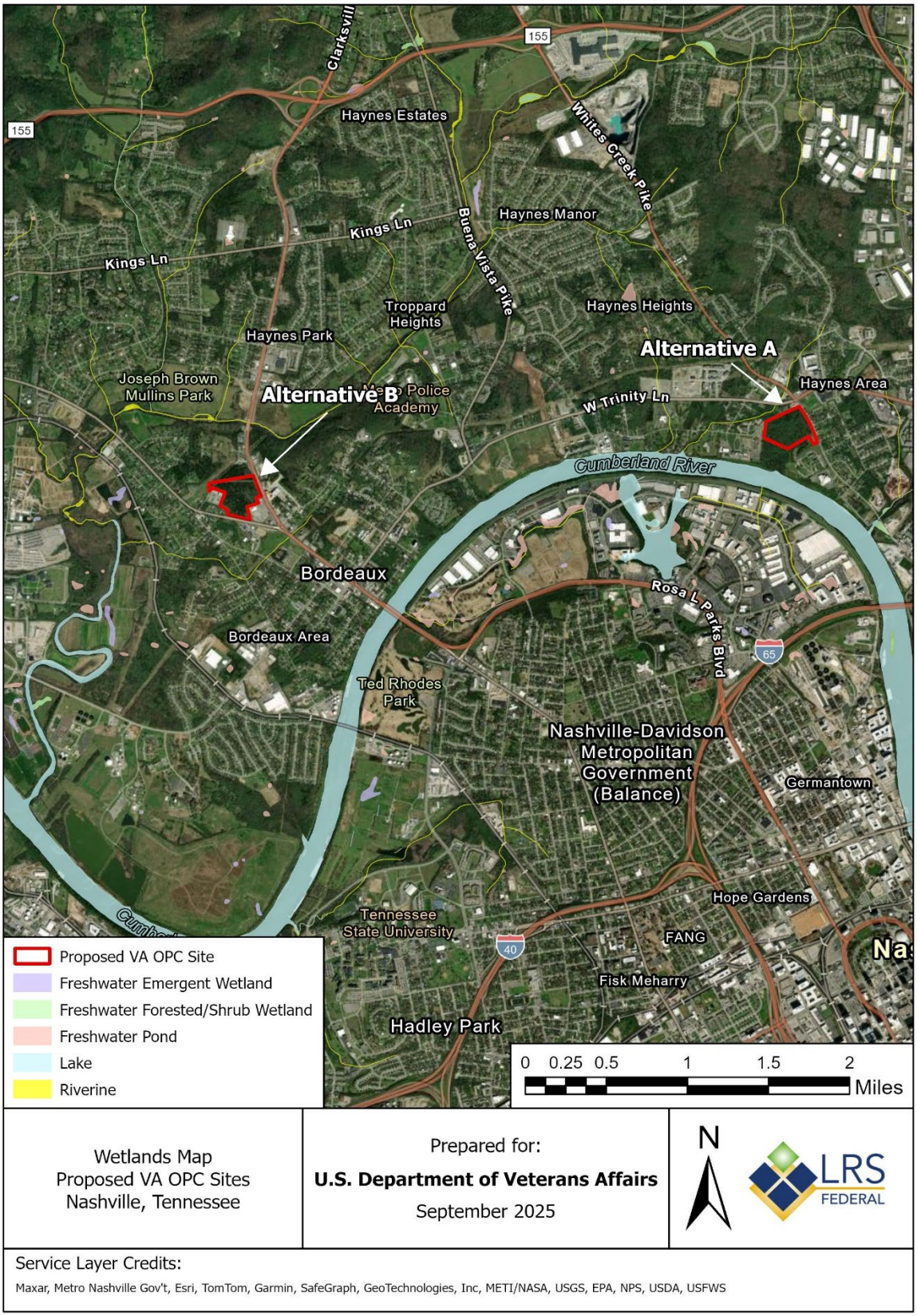


Figure 3-6. National Wetlands Inventory Map

3.9.2 Environmental Consequences

3.9.2.1 Alternatives A and B

Site locations for Alternatives A and B are not in or adjacent to flood hazard areas, and as such the Proposed Action would not impact floodplains. Site elevations and the distance from flood hazard areas would prevent any flooding to the proposed buildings or developed areas. The proposed grade for Alternative A site development is approximately 35 feet higher than the 500-year floodplain for the Cumberland River. The associated Zone AE, SFHA, and 500-year floodplain that extend from Whites Creek are located over 1,200 feet from the Alternative B development site. Additionally, the proposed grade for Alternative B site development is approximately 40 feet higher than the 500-year floodplain for the Whites Creek.

Due to the absence of wetlands and other jurisdictional waters within or adjacent to the proposed sites for Alternative A and B, the Proposed Action would not impact wetlands or water resources.

3.9.2.2 No Action Alternative

Under the No Action Alternative, the OPCs would not be constructed or operated. No impacts to floodplains, wetlands, or water resources would occur as a result of VA's actions.

3.10 Socioeconomics

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

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

3.10.1 Affected Environment

3.10.1.1 Alternatives A and B

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

Nashville has a higher minority and Hispanic population than Davidson County and the State of Tennessee, and a lower Veteran population than the State of Tennessee (Table 3-4).

Table 3-4. Population and Veteran Status

Geographic Area	Population	Population Under 18 Years	Population 65 Years and Over	Minority	Hispanic	Veterans
Tennessee	7,126,489	21.9%	17.5%	27.7%	7.5%	7.1%

Davidson County	712,334	20.4%	13.3%	44.8%	13.7%	4.8%
Nashville	687,787	20.3%	13.0%	45.5%	14.1%	4.8%

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

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

Geographic Areas	Number of Households	Median Household Income	Poverty Status in the Past 12 Months	Unemployment Rate
Tennessee	2,889,226	$67,631	14%	4.0%
Davidson County	341,597	$80,379	11.7%	2.2%
Nashville	330,506	$80,217	11.9%	2.3%

F.H. Jenkins Preparatory School and Born-Again Church Christian Academy are located approximately one mile west, and Haynes Middle School is located under one mile northeast, of Alternative A.

Creswell Middle Prep School of the Arts is located under one mile and Ivanetta H. Davis Early Learning Center is located just above one mile south of Alternative B.

There are no parks located within one mile of either Alternative location.

3.10.2 Environmental Consequences

3.10.2.1 Alternatives A and B

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

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

3.10.2.2 No Action Alternative

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

3.11 Community Services

3.11.1 Affected Environment

3.11.1.1 Alternative A, and B

The Alternative A site is located in the Metro Nashville Public Schools, District 1; the closest school is Haynes Middle School, located approximately 0.3 miles from the proposed site. The Alternative B site is located in the Metro Nashville Public School, District 1; the closest school is Creswell Middle Prep School of The Arts, located approximately one mile from the proposed site.

Both Alternative sites are served by the Metropolitan Nashville Police Department, North Precinct and the Metropolitan Nashville Fire Department.

There are multiple hospitals in the city of Nashville, including the Vanderbilt University Medical Center, TriStar Centennial Medical Center, Ascension Saint Thomas Hospital, and Nashville General Hospital.

There are several parks located in Nashville, including Centennial Park, Bicentennial Capital Mall State Park, and Shelby Park. Hartman Park Regional Center and Joseph Brown Mullis Parks are located approximately two miles northeast and one mile northwest of Alternative B, respectively.

Public transportation in Nashville is served by the Nashville Metropolitan Transit Authority (MTA) via WeGo Public Transit bus services. The MTA also includes WeGo Star, a commuter rail that travels along the East Corridor, going from Nashville to Lebanon, Tennessee.

3.11.2 Environmental Consequences

3.11.2.1 Alternatives A and B

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

3.11.2.2 No Action Alternative

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

3.12 Solid Waste and Hazardous Materials

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

USEPA has delegated enforcement of the RCRA Subtitle C hazardous waste requirements to the Tennessee Division of Solid Waste Management (DSWM). TDEC Rule 0400-12-01 requires any person owning or operating a new or existing facility that treats, stores, or disposes of hazardous waste to obtain

a Hazardous Waste Management Permit. If construction or demolition debris generated onsite is designated as hazardous waste, the private entity would be required to obtain this permit.

Those who want to send special waste to a Tennessee-permitted disposal or processing facility must submit a Special Waste Application for evaluation which, if approved, is to be recertified every three fiscal years. The DSWM considers medical wastes as special waste, which the outpatient clinic is likely to produce, and is generally prohibited from processing in solid waste disposal facilities.

3.12.1 Affected Environment

3.12.1.1 Alternative A

A Phase I ESA was conducted by TVG Environmental on the proposed site for Alternative A in May 2023. No recognized environmental conditions (RECs), controlled recognized environmental conditions, historical recognized environmental conditions, or vapor encroachment conditions were found.

All identified within 0.25 miles of the site, there are three registered underground storage tank (UST) facilities and one voluntary cleanup or Brownfield site, of which none are considered as RECs in connection with the site by TVG Environmental.

3.12.1.2 Alternative B

A Phase I ESA was conducted by The Breland Group, LLC on the proposed site for Alternative B in October 2023. No RECs, controlled recognized environmental conditions, historical recognized environmental conditions, or vapor encroachment conditions were found..

A review of the TDEC Division of Underground Storage Tank records indicated no tank registration or tank removal activity on the subject property, and four leaking UST files for registered facilities located within a one-half mile radius of the site. In all four UST records, due to the current regulatory status and distance, the probability of adverse environmental risk is considered minimal.

3.12.2 Environmental Consequences

3.12.2.1 Alternatives A and B

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

Waste generated as part of construction activities would be effectively managed and disposed of according to Federal, State, and local regulations. Wastes would be collected and properly disposed of by a waste disposal company at an approved disposal facility.

Operation of the OPC would generate solid waste, hazardous materials, and medical waste. These wastes would be managed and disposed of in compliance with Federal, State, and local regulations. The waste would be collected and properly disposed of by approved waste disposal companies at approved disposal facilities. A Hazardous Waste Management Permit would be obtained from DSWM if construction waste generated onsite is designated as hazardous waste. Additionally, a Special Waste Permit would be obtained if medical waste is proposed for disposal at a Tennessee-permitted disposal or processing facility.

Based on the Phase I ESAs and the previous and current uses of Alternative A and Alternative B, no contamination is known or suspected at the sites. Construction and operation waste handling would comply with all applicable requirements. As a result, impacts related to solid waste and hazardous materials would be less than significant for Alternatives A and B.

3.12.2.2 No Action Alternative

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

3.13 Traffic, Transportation, and Parking

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

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

3.13.1 Affected Environment

A Traffic Impact Study was completed in October 2024 for each alternative that analyzed the impacts of the construction and operation of the proposed OPC (Jacobs, 2025). The study collected vehicular turning movement counts, conducted operational analyses for existing and future conditions, and simulated synchro network models to evaluate network operations for No-Build and Build scenarios. The study collected vehicle turning movement counts at major study intersections and projected background traffic growth according to the methodologies and guidance published by the Institute of Transportation Engineers *Trip Generation Manual*. The intent of the Traffic Impact Study was to provide a high-level traffic analysis based on intersection count data, estimated vehicles entering and leaving each site, and projected background growth to guide future decision making.

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

3.13.1.1 Alternative A

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

- Interstate 24
- West Trinity Lane
- Whites Creek Pike
- Baptist World Center Drive
- Brick Church Pike

Proposed driveways accessing the site include:

- Driveway 1: Baptist World Center Drive at Gooch Street
- Driveway 2: Baptist World Center Drive at Roger Avenue

- Service Entries: Two service entrances at Youngs Lane

The current LOS is shown for each major intersection in the vicinity of Alternative A (Table 3-6). Currently, all intersections have a passing LOS with a rating of D or higher.

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

Intersection	LOS/Delay(s), Overall	
	a.m. Peak Hour	p.m. Peak Hour
Baptist World Center Drive at Trinity Lane (Signalized)	D (39.7)	C (35.0)
Baptist World Center Drive at Gooch St/Site Driveway #1 (Two-way Stop-Controlled)	A (0.2)	A (0.4)
Baptist World Center Drive at Roger Ave/Site Driveway #2 (Two-way Stop-Controlled)	A (0.2)	A (0.2)
Trinity Lane at I-24 South Bound Ramps/Brick Church Pike (Signalized)	D (35.5)	C (24.7)
Trinity Lane at I-24 North Bound Ramps (Signalized)	C (27.3)	B (16.1)

3.13.1.2 Alternative B

Major roads and roadways in the vicinity of Alternative B include:

- Clarksville Pike
- Ashland City Highway
- Buena Vista Pike
- South Hamilton Road

Proposed driveways accessing the site include:

- Driveway 1: Main Entrance on Ashland City Highway
- Driveway 2: Site Entrance on Ashland City Highway
- Driveway 3: Site Entrance on Clarksville Pike

The current LOS is shown for each major intersection in the vicinity of Alternative B (Table 3-7). Currently, all intersections have a passing LOS with a rating of E or higher.

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

Intersection	LOS/Delay(s), Overall	
	a.m. Peak Hour	p.m. Peak Hour
N Hydes Ferry Rd & Ashland City Highway (Two-way Stop-controlled)	A (2.7)	A (3.3)
YMCA Driveway & Ashland City Highway (Two-way Stop-controlled)	A (1.7)	A (1.4)
Clarksville Pike and Ashland City Highway/Courtney Ave (Signalized)	E (72.3)	C (21.8)
Clarksville Pike and S Hamilton Rd/Buena Vista Pike (Signalized)	D (48.1)	C (30.8)
Clarksville Pike & W Hamilton Rd/W Hamilton Ave (Signalized)	C (24.2)	C (21.3)

3.13.2 Environmental Consequences

During construction activities, there would be an increase in construction vehicles that would likely contribute to a temporary increase in traffic volumes, minor congestion, and possibly detours for both alternatives. Impacts to traffic during construction would be temporary and localized and therefore, less than significant. Parking for the OPC would be sized to handle the anticipated volume of cars expected to visit the facility on a daily basis with an anticipated 1,100 parking spaces.

The Metropolitan Government of Nashville-Davidson County is also responsible for providing a safe and efficient transportation system. Article III of Chapter 17.20.140 of the Zoning Regulations for the Metropolitan Government of Nashville and Davidson County states that a Traffic Impact Study be completed for the purpose of identifying the improvements, if any, that are needed to offset the additional traffic generated by a proposed level of development. Further coordination, planning, and traffic analysis, in conjunction with local communities and NDOT, would be required to develop any mitigation measures required to minimize impacts to traffic.

3.13.2.1 Alternative A

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

- West Trinity Lane at Baptist World Center Drive, p.m. peak hour (LOS F)
- Baptist World Center Drive at Gooch Street/site entrance #1, p.m. peak hour (LOS F)

The anticipated LOS at major intersections in the vicinity of Alternative A in 2028 is shown in Table 3-8.

Table 3-8. Level of Service at Major Intersections for 2028 Future Conditions

Intersection	LOS/Delay(s), Overall			
	Future 2028 No-Build		Future 2028 Build	
	a.m. Peak Hour	p.m. Peak Hour	a.m. Peak Hour	p.m. Peak Hour
Baptist World Center Drive at Trinity Lane (Signalized)	D (39.6)	D (35.6)	D (50.0)	F (117.6)
Baptist World Center Drive at Gooch St/Site Driveway #1 (Two-way Stop-Controlled)	A (0.2)	A (0.4)	A (2.1)	F (132.7)
Baptist World Center Drive at Roger Ave/Site Driveway #2 (Two-way Stop-Controlled)	A (0.2)	A (0.2)	A (0.3)	A (0.2)
Trinity Lane at I-24 South Bound Ramps/Brick Church Pike (Signalized)	D (35.0)	C (25.0)	C (25.0)	C (25.8)
Trinity Lane at I-24 North Bound Ramps (Signalized)	C (23.9)	A (8.4)	D (46.3)	B (15.8)

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

- West Trinity Lane – east of Baptist World Center Drive: 29.5%
- Baptist World Center Drive – south of site: 7.7%
- Baptist World Center Drive – north of site: 121.5% (within 1,000 feet of the proposed main entrance) – east of site
- Whites Creek Pike: 1.3%

The two intersections expected to operate at LOS F in the Build Scenario would require the consideration of traffic mitigation measures. Recommended mitigation measures include a dedicated southbound right-

turn lane to increase capacity for the high volume of right turns onto the site at Driveway #1, a traffic signal to reduce delays at Driveway #1, and a new northbound right-turn lane on Baptist World Center Drive approaching West Trinity Lane to improve operations. With these improvements, LOS at Baptist World Center Drive at Trinity Lane during p.m. peak hours improve from F (117.6) to D (47.0), decreasing by 70.6 seconds per vehicle, and LOS at Driveway #1 during p.m. peak hours improve from F (132.7) to C (23.6), decreasing by 109.1 seconds per vehicle. Increased traffic volumes, particularly adjacent to the site along Baptist World Center Drive and at West Trinity Lane would further be managed by these recommended operational improvements. With the implementation of mitigation measures, and in coordination with local communities and NDOT, traffic impacts are expected to be less than significant.

3.13.2.2 Alternative B

Based on the findings of the October 2024 Traffic Impact Study, the Build Scenario for Alternative B would not result in any significant operational/safety impacts to its adjacent road network. All intersections are expected to operate at an acceptable LOS (LOS E or better) during a.m. and p.m. hours except for Site Entrance 1 on Ashland City Highway which is projected to operate at LOS F in p.m. peak hours.

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

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

Intersection	LOS/Delay(s), Overall			
	Future 2028 No-Build		Future 2028 Build	
	a.m. Peak Hour	p.m. Peak Hour	a.m. Peak Hour	p.m. Peak Hour
N Hydes Ferry Rd & Ashland City Highway (Two-way Stop-controlled)	A (2.1)	A (3.5)	A (3.3)	A (4.6)
YMCA Driveway & Ashland City Highway (Two-way Stop-controlled)	A (1.5)	A (1.4)	A (1.6)	A (1.3)
Clarksville Pike and Ashland City Highway/Courtney Ave (Signalized)	E (63.5)	C (21.9)	E (78.6)	C (22.7)
Clarksville Pike and S Hamilton Rd/Buena Vista Pike (Signalized)	D (49.2)	C (31.4)	D (49.9)	D (35.7)

Clarksville Pike & W Hamilton Rd/W Hamilton Ave (Signalized)	C (24.9)	C (22.4)	C (29.7)	C (27.7)
Site Entrance 1 – Ashland City Highway (Two-way Stop-controlled)	–	–	A (2.6)	F (68.3)
Site Entrance 2 – Ashland City Highway (Two-way Stop-controlled)	–	–	A (0.1)	A (0.1)
Site Entrance 3 – Clarksville Pike (Two-way Stop-controlled)	–	–	A (1.3)	A (3.5)

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

- Ashland City Highway – west of site: 21.0%
- Clarksville Pike – north of Ashland City Highway: 13.5%
- Clarksville Pike – north of the Cumberland River Bridge: 8.7%

Site Entrance 1, expected to operate at LOS F in the Build Scenario, would require consideration of traffic mitigation measures. Recommended mitigation measures include the construction of clustered traffic signals at Site Entrance 1/Main Entrance and YMCA Entrance on Ashland City Highway. With these mitigation measures, Site Entrance 1 at p.m. peak hour improves from LOS F (68.3) to B (14.7), decreasing by 53.6 seconds per vehicle. Increased traffic volumes, particularly along Ashland City Highway, would further be managed by these recommended operational improvements. With the implementation of mitigation measures, and in coordination with local communities and NDOT, traffic impacts are expected to be less than significant.

3.13.2.3 No Action Alternative

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

3.14 Utilities

3.14.1 Affected Environment

3.14.1.1 Alternative A and B

Basic utilities in the vicinity of the alternative sites (water, sewer, natural gas, and electric) are provided by various utility providers. As part of the preparation of this EA, local utility providers were researched

to determine the availability of required utilities in the vicinity of the proposed sites. Utility providers to the sites were identified as follows:

- **Nashville Electric Services** provides electricity to the vicinity of the alternative sites
- **Piedmont Natural Gas** supplies natural gas to the vicinity of the alternative sites
- **Metro Water Services** supplies potable water, sanitary sewer, and stormwater sewer services to the vicinity of the alternative sites

3.14.2 Environmental Consequences

3.14.2.1 Alternatives A and B

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

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

3.14.2.2 No Action Alternative

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

3.15 Potential for Generating Substantial Controversy

VA solicited input from Federal, State, and local government agencies regarding the Proposed Action. No opposition or controversy with the Proposed Action has been identified. The OPC would have a beneficial impact as it would improve access to high-quality healthcare for Veterans in the region. Refer to Section 5.0 for more information on public participation.

4.0 Protection and Mitigation Measures

Resource Area	Description	Type
Aesthetics	Design new structures to be architecturally and visually consistent with the current buildings located at the alternatives.	BMP
	Install and maintain landscaped areas, buildings, roadways, and signage.	BMP
	Incorporate existing topography and natural features into site design, wherever possible.	BMP
Air Quality	Use appropriate fugitive dust suppression measures.	BMP
	Use newer construction equipment with emissions controls and maintain equipment.	BMP
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.	BMP
	Implement site-specific SWPPP and erosion and sediment control plan to minimize and avoid fugitive dust as applicable.	Regulatory Requirement
	Prohibit the burning of trees, vegetation and debris during construction in accordance with the Metro Public Health Department of Nashville and Davidson County regulations.	Regulatory Requirement
	New stationary emergency engines greater than 500 horsepower (HP) and natural gas-fired boilers would be installed in accordance with federal regulations under 40 CFR Parts 60 (Standards of Performance for New Stationary Sources) and 63 (National Emission Standards for Hazardous Air Pollutants for Source Categories).	Regulatory Requirement
Cultural and Historic Resources	In the event human remains or other cultural items, as defined by the Native American Graves Protection and Repatriation Act, are found during construction or operation of the OPC, work would be halted in the area and the appropriate authorities and tribes would be contacted.	Regulatory Requirement
	If the project's scope of work changes from that which has been submitted to and concurred with by consulting parties, further coordination would be	Regulatory requirement

	required. Further, respective tribes would be notified for additional consultation.	
Geology and Soils	The private entity would obtain a NPDES permit, a Nashville and Davidson County Grading permit, and develop an Erosion and Sediment Control Plan.	Regulatory Requirement
	The Erosion and Sediment Control Plan would be implemented to address soil disturbance during construction that includes the deployment of erosion and sediment control devices and stabilization practices.	Regulatory Requirement
	The proposed OPC would be designed and constructed to VA design criteria while incorporating radon-resistant features and construction methods to mitigate the potential for radon.	BMP
Hydrology, Stormwater, and Water Quality	Use environmentally sensitive site design, stormwater pollution prevention controls, good engineering practices, and construction BMPs.	BMP
	Implement appropriate groundwater engineering controls and dewatering practices should groundwater be encountered during construction.	BMP
	Implement site-specific SWPPP and erosion and sediment control plan to minimize run-off into local waterways.	Regulatory requirement
Wildlife and Habitat	Operate all vehicles traveling within and around the project area in accordance with posted speed limits.	BMP
	In advance of any proposed tree clearing between March 1 to September 30, conduct a pre-construction clearance survey to determine the presence/absence of nesting MBTA birds, and coordinate with USFWS to determine the potential need for non-disturbance buffers or other mitigation, as required.	Regulatory requirement
	For Alternatives A and B, restrict all tree clearing to months when listed bat species would not be impacted (restrict between May 15 to July 31).	Conservation Measure
	Reduce nighttime lighting and noise/vibration impacts near bat roost habitat.	BMP

	Minimize lighting and maintain forested corridors to preserve habitat connectivity for the northern long-eared bat and tri-colored bat species.	BMP
	Limit vegetation removal within the area to the extent possible.	BMP
Noise	Limit construction-related noise near sensitive receptors and coordinate proposed construction activities in advance with any nearby sensitive receptors.	BMP
	Shut down noise-generating equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
	Utilize broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements and encourage construction personnel to operate equipment in the quietest manner practicable.	BMP
	Locate stational operating equipment as far away from sensitive receptors as possible.	BMP
	Select material transportation routes as far away from sensitive receptors as possible.	BMP
	Maintain equipment per manufacturer's recommendations to minimize noise generation	BMP
	Adhere to local noise ordinances including restricting construction noise between 7 p.m. and 7 a.m. except for the months of June through August, during which the restriction is between 8 p.m. and 6 a.m. As per Chapter 9.30.010 of the Metropolitan Government of Nashville and Davidson County, Tennessee Code of Ordinances, construction of utility and road work and transporting and unloading of construction materials are allowed between 5 a.m. and 7 p.m.	Regulatory requirement
Land Use	Consultation with the Nashville Department of Codes and Building Safety, Zoning Division may be required for re-zoning purposes.	Regulatory requirement
	Obtain all required encroachment permits and Excavation or Obstruction Permits prior to construction	Regulatory requirement

Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.	Protection Measure
Community Services	Coordinate any short-term road closures with the local emergency and transportation services to prevent significant disruption to their services.	BMP
Solid Waste and Hazardous Materials	Store and appropriately label petroleum products and hazardous materials in approved containers.	Regulatory requirement
	Store containers on a level and impervious surface.	BMP
	Use secondary containment systems around fuel storage containers during refueling activities. Should a spill or release occur, any impacted soil would be properly handled per Federal and State laws and regulations.	Regulatory requirement
	Obtain a Hazardous Waste Management Permit in accordance with TDEC Rule 0400-12-01.	Regulatory Requirement
	Submit a Special Waste Application for evaluation to TDEC Division of Solid Waste Management which, if approved, is to be recertified every three fiscal years.	Regulatory Requirement
Traffic, Transportation, and Parking	Coordinate with the Metropolitan Government of Nashville and Davidson County on any short-term road closures during construction.	BMP
	Sequence construction to the extent feasible to minimize impacts to traffic or transportation patterns.	BMP
	Implement mitigation measures, in coordination with local communities and NDOT, to address increased traffic volumes and levels of service at surrounding intersections. In accordance with Article III of Chapter 17.20.140 of the Zoning Regulations for the Metropolitan Government of Nashville and Davidson County, further traffic analysis may be warranted to identify the improvements required to offset any additional traffic.	Regulatory Requirement
Utilities	None required.	N/A

5.0 Public Participation

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

5.1 Agency Coordination

VA coordinated with agencies regarding the proposed OPC construction and operation in Nashville, TN. In November 2024, VA distributed scoping letters to Federal, State, county, and municipal government agencies as listed in Section 6.0. Separately, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (54 U.S.C. § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties), VA initiated consultation with consulting parties to seek input regarding the undertaking's effects on historic properties. VA consulted with the following parties pursuant to Section 106 of the NHPA: Tennessee Historical Commission; U.S. Department of the Interior Indian Affairs; Tennessee Commission of Indian Affairs; and the Nashville Planning Department.

The Tennessee Historical Commission found that the project as currently proposed would not adversely affect the American Baptist Theological Seminary Historic District, a cultural resource eligible for listing in the NRHP, and had no objection to the implementation of the project as currently planned, as documented in their October 28, 2025 letter (Appendix B). The Nashville Historical Commission raised questions about the property history and remnants of structures located within the proposed parcel for Alternative A during archaeological survey and recommended additional testing and documentation of the location. VA responded that the architectural elements are likely remnants of housing and farm-related structures that supported the adjacent American Baptist Theological Seminary and were likely constructed post-1946 and provided a Phase I ESA, which contained additional property history and historical research documentation. On October 23, 2025, the Nashville Historical Commission raised questions over structures identified on a historical map of Davidson County from 1871 that appear to be located adjacent to the Cumberland River. VA informed the Nashville Historical Commission that since these structures are outside of the parcel being considered for lease for the proposed OPC, they were not archaeologically surveyed. No further responses were received.

VA has coordinated with USFWS through IPaC submissions and a project review request submitted to the USFWS Tennessee Ecological Field Office. USFWS letters recording VA's determination of effect for threatened and endangered species, along with corresponding determination keys for the Proposed Action under Alternative A and B, are provided in Appendix B. For Alternative A, a letter recording VA's determination of *"not likely to adversely affect"* for the tri-colored bat was provided by USFWS on September 16, 2025 through the IPaC system. A project review request was submitted to the USFWS Tennessee Ecological Field Office on September 26, 2025, for Alternative B, to obtain concurrence with the effect determinations (may affect, not likely to adversely affect) for the northern long-eared bat and tri-colored bat. USFWS concurrence of VA's determinations for Alternative B was subsequently received on September 29, 2025 and is provided in Appendix B.

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

5.2 Native American Consultation

Pursuant to Section 106 of the NHPA of 1966, as amended (54 U.S.C. § 306108), and its implementing regulations (36 CFR Part 800 – Protection of Historic Properties), VA also consulted with federally recognized Indian tribes in the vicinity of the Proposed Action, including the Eastern Band of Cherokee Indians; Catawba Indian Nation; Edisto Natchez-Kusso Tribe of South Carolina; Cherokee Nation;

Coushatta Tribe of Louisiana; Alabama-Coushatta Tribe of Texas; Muscogee (Creek) Nation; Osage Nation; and Eastern Shawnee Tribe of Oklahoma. VA also consulted with the U.S. Department of the Interior, Indian Affairs – Eastern Regional Office.

VA did not receive any responses from federally recognized Indian tribes or from the U.S. Department of the Interior, Indian Affairs – Eastern Regional Office during the consultation period.

5.3 Scoping

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

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

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

5.4 Public Review

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability published in *The Nashville Tennessean*. Review copies of the Draft EA were made available online at https://www.cfm.va.gov/environmental/index.asp and at the Nashville Public Library, located at 615 Church St, Nashville, TN 37219.

VA received comments on the Draft EA during the public comment period from TDEC on November 14, 2025. TDEC offered comments concerning air quality; fugitive dust and mobile source emissions; open burning; federal regulations pertaining to stationary emergency engines and natural gas-fired boilers; and CGP compliance. Comments provided by TDEC were not indicative of approval or disapproval of VA's Proposed Action (Appendix B). TDEC's comments are addressed in this Final EA.

6.0 Agencies and Persons Consulted

Affiliation	Mailing Address
Federal Agencies	
U.S. Army Corps of Engineers - Nashville District, Great Lakes and Ohio River Division	USACE Nashville District 110 9th Avenue South Nashville, TN 37203
U.S. Department of Agriculture Rural Development Service Center Office	441 Donelson Pike Suite 310 Nashville, TN 37214-3568
U.S. Department of Agriculture Gallatin Service Center	150 Albert Gallatin Ave. Gallatin, TN 37066-2085
U.S. Fish and Wildlife Service Tennessee Ecological Services Field Office	446 Neal St. Cookeville, Tennessee, 38501
U.S. Department of the Interior Indian Affairs - Eastern Regional Office	545 Marriott Dr. Suite 700 Nashville, TN 37214
State Agencies	
Tennessee Commission of Indian Affairs	401 Church St. 1st Floor, L&C Annex Nashville, TN 37243
Tennessee Historical Commission	2941 Lebanon Pike Nashville, TN 37214
Tennessee Wildlife Resources Agency	5107 Edmondson Pike Ellington Agricultural Center Nashville, TN 37211
Tennessee Department of Environment & Conservation	Davy Crockett Tower 500 James Robertson Parkway Nashville, TN 37243
Tennessee Board of Water Quality, Oil & Gas	Davy Crockett Tower 500 James Robertson Parkway Nashville, TN 37243
Division of Water Resources	Davy Crockett Tower 500 James Robertson Parkway Nashville, TN 37243

Affiliation	Mailing Address
Local Agencies	
Davidson County Planning & Zoning	913 Greensboro St. Suite 305 Lexington, NC 27292
Nashville Planning Department	P.O. Box 196300 Nashville, TN 37219-6300
Tribes	
Eastern Band of Cherokee Indians	P.O. Box 1927 Cherokee, NC 28719
Edisto Natchez-Kusso Tribe of South Carolina	Edisto Natchez-Kusso Tribe of South Carolina 1125 Ridge Rd. Ridgeville, SC 29472
Catawba Indian Nation	996 Avenue of the Nations Rock Hill, SC 29730
Cherokee Nation	PO Box 948 Tahlequah, OK 74465
Alabama-Coushatta Tribe of Texas	571 State Park Road 56 Livingston, TX 77351
Coushatta Tribe of Louisiana	1940 C.C. Bel Rd. Elton, LA 70532
Muscogee (Creek) Nation	PO Box 580 Okmulgee, OK 74447
Eastern Shawnee Tribe of Oklahoma	29 S Hwy 69A Miami, OK 74354
Osage Nation	Pawhuska, OK 74056
Local Community	
Baptist World Center Drive (Alternative A)	
American Baptist College	1800 Baptist World Center Dr. Nashville, TN 37207
Lock One Marine: Nashville Municipal Docks	1505 Lock Rd. Nashville, TN 37207
Ashland City Highway & Clarksville Pike (Alternative B)	

Affiliation	Mailing Address
Creswell Middle Prep School of The Arts	3500 John Mallette Dr. Nashville, TN 37218
Metro Parks and Recreation Joseph Brown Mullins Park	4297 Drakewood Ln. Nashville, TN 37218

7.0 List of Preparers

7.1 Department of Veterans Affairs Staff

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7.2 LRS Federal (Consultants)

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

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9.0 Glossary

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

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

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

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

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

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

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

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

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

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

Emission—A release of a pollutant.

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

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

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

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

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

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

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

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

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

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

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

Any toxic pollutant listed under TSCA.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix A: Permits

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

TDEC Division of Water Resources NPDES Construction Stormwater General Permit

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

Nashville and Davidson County Grading Permit

A Grading Permit is required by the Nashville & Davidson County Metropolitan Department of Water and Sewerage Services (MWS) in Chapter 4, Volume 1 – Regulations of the County's Stormwater Management Manual for land disturbing activities. The Metropolitan Government of Nashville & Davidson County defines grading as any operation or occurrence by which the existing site elevations are changed; or where any ground cover, natural or man- made, is removed; or any watercourse or body of water, either natural or man- made, is relocated on any site, thereby creating an unprotected area, including stripping, cutting, filling, stockpiling, or any combination thereof, and shall apply to the land in its cut or filled condition. If the project meets the applicability of a Grading Permit, the following is required to be submitted with the application before any land disturbing activities: copies of all applicable state and federal permits, Grading and Drainage Plans, Erosion Prevention and Sediment Control Plans, a Post-Construction Stormwater Management Plan, and sinkhole and drainage well information. The construction of the OPC on any Alternative would require land disturbing activities, therefore VA is required to obtain the Grading Permit.

Metropolitan Government of Nashville and Davidson County Noise Regulations

Per Chapter 9.30.010 of the Metropolitan Government of Nashville and Davidson County, Tennessee Code of Ordinances, no outdoor construction, repair or demolition of buildings, structures, land, driveways, or appurtenances thereto on the proposed OPC site is lawful between 7:00 pm and 7:00 am except for the months of June through August, during which the restriction is between 8:00 pm and 6:00 am. Outdoor construction of utility and road work, hauling and hoisting of large roads, and transporting and unloading of construction materials other than blast materials between 5:00 am and 7:00 pm are exempt from the above restrictions. If the construction of the OPC is expected to violate Chapter 9.30.010, an application to the director of the Department of Codes Administration must be made to obtain a permit to perform these activities before they occur.

MWS Water and Sewer Service Permit

Any proposed commercial developments within MWS's water and/or sewer service areas need a determination of the sufficient availability of water and/or sewer services before construction begins. Once availability is determined, MWS Development Services will create a Water and Sewer Capacity Permit and calculate capacity fees. If considered a Public Extension Project, construction plans and a Site Utility Plan must be submitted. If these plans are approved, a Construction Permit must then be submitted for approval. These approvals are required for MWS's signature on the applicant's local Building Permit.

MWS Water Meter Permit and Inspection

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

reduction of water. The Metropolitan Government of Nashville and Davidson County requires a Water Meter Installation Permit for new water meters, which can only be given to regular licensed plumbers who have given bond as required by laws of the metropolitan government. All meters must be inspected upon installation and may need a final inspection to satisfy all requirements.

TDEC CAA Air Quality Construction Permit and Air Quality Operating Permit

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

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

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

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

TDEC DSWM Special Waste Application

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

Nashville & Davidson County Commercial Use and Occupancy (U&O) Permit

If a use on a parcel of land is changed and construction or remodeling is involved, the applicant must obtain a U&O Permit. The issuance of a U&O Permit allows for compliance with Nashville & Davidson County zoning codes and regulations. Land use changes regarding zoning may be required for either Alternative. To apply for a U&O Permit, the following must be submitted to the Zoning Department: A Commercial Permit application, and a site plan or multi-tenant parking survey from the landlord if the proposed use is changed from the prior use and the parcel is not located within the Urban Zoning Overlay. If it is a single tenant space, a Commercial Parking Site Plan must also be submitted.

Nashville Department of Transportation Encroachment

Any aerial, underground, or building that encroaches on the Metro right-of-way must obtain an encroachment permit and is subject to associated fees per Chapter 13.16 of the Metropolitan Government of Nashville and Davidson County Code of Ordinances.

Nashville Department of Transportation Excavation and Obstruction Permit

Per Chapter 13.20.020 of the Metropolitan Government of Nashville and Davidson County Code of Ordinances, no person shall excavate or cause any obstruction to be constructed or placed in, on, over, or under any street, road, alley, sidewalk, or other pubic way, or occupy any portion of a public right-of-way in connection with any excavation or obstruction within the jurisdiction of the metropolitan government without obtaining an Excavation or Obstruction Permit.