



## Shelby County Government Office of Resiliency

125 NORTH MAIN STREET, ROOM 443, MEMPHIS, TENNESSEE 38103-2084

Tel: (901) 222-7602 Fax: (901) 222-7621

**Mark H. Luttrell, Jr.**

**Mayor**

April 2, 2018

DHS/FEMA R4

Attention: E011988/NEPA Reviewer

3003 Chamblee Tucker Road

Atlanta, GA 30341-4112

Dear E011988/NEPA Reviewer:

Attached is a Public Notice which ran locally on April 1<sup>st</sup>, and which will run again on April 5<sup>th</sup>, and April 6<sup>th</sup>, 2018 for the 15-day review period in Shelby County, Tennessee. This is the second notice under the HUD 8-Step Review process for the use of National Disaster Resilience (NDR) Grant funds. The Notice addresses activities under the Wolf River Wetland and Restoration Greenway Project which includes Orchi Street Infrastructure and Construction; Rodney Baber Park Infrastructure and Construction; Kennedy Park Infrastructure and Construction; and Earthwork, Utility Installation, Demolition, and Property Acquisition associated with the Project.

Activities under the Wolf River Wetland and Restoration Greenway Project are part of the long-term resilience projects and activities identified under the NDR Competition and a subsequent NDR Grant awarded to Shelby County by the Department of Housing and Urban Development. The Notice is being forwarded to you to inform you of the project, project activities, the review period associated with this project, and to directly solicit any comments that FEMA may have on the activity itself.

This project is being carried out by Shelby County Government and will improve overall resiliency to Rodney Barber Park, Kennedy Park and Orchi Street in Memphis, Tennessee. Should you have any comments or questions, please contact Mr. Drake Danley, with Kimley-Horn and Associates, Inc., at 901-374-9109 or [Drake.Danley@kimley-horn.com](mailto:Drake.Danley@kimley-horn.com). Written comments can also be submitted to: Kimley-Horn and Associates, Inc., Attention: Drake Danley, 6750 Poplar Avenue, Suite 600, Memphis, TN 38138. I can also be reached at 901-636-7170 or [jim.vazquez@memphistn.gov](mailto:jim.vazquez@memphistn.gov)

Respectfully,

Jim Vazquez, Administrator  
Office of Resilience

Attachment

**FINAL NOTICE AND PUBLIC EXPLANATION OF A PROPOSED  
ACTIVITY IN A WETLAND AND FLOODPLAIN WITHIN THE WOLF RIVER BASIN  
IN SHELBY COUNTY, TENNESSEE**

To: All interested Federal, State and Local Agencies and Groups or Individuals

This is to give notice that Shelby County Government under Part 58 has conducted an evaluation as required by Executive Order 11988, to determine the potential affect that its activity in wetlands and the floodplain will have on the human environment for the Wolf River Wetland Restoration and Greenway project under the HUD National Disaster Resiliency Grant, Contract Number B-13-US-470002.

Shelby County Government is proposing a series of open space and infrastructure project elements that will help make the greater Memphis area more resilient in future disaster and flooding events. The Wolf River Wetland Restoration and Greenway activity encompasses improvements at three distinct locations – Rodney Baber Park, John F. Kennedy Park, and Orchi Road between Highland Street and Jackson Avenue.

For this notice, all three project activities are located within the Wolf River Floodplain. Additionally, there will be minor impacts on isolated wetlands. The Rodney Baber Park improvements will affect approximately 58.2 acres of floodplain and 0.79 acres of wetlands. The John F. Kennedy Park improvements will affect approximately 32.2 acres of floodplain and 0 (zero) acres of wetlands. The Orchi Road improvements will affect approximately 2.5 acres of floodplain and 0.20 acres of wetlands. The following describes the project locations and their proposed improvements:

The natural and beneficial functions of the floodplain and the wetlands will be marginally impacted by the proposed construction in the parks and along Orchi Road. In the parks, new wetlands and ponds will be created and the recreational features (sports fields, pavilions, etc.) designed to elevate them above the floodplain while preserving or replacing the existing adjacent floodplain area.

***Rodney Baber Park***

Rodney Baber Park is located directly south of James Road, half a mile west of Hollywood and is bounded by McLean on the West and Interstate 40 on the South. The proposed concept plan for Rodney Baber Park will consist of up to four (4) soccer fields, one (1) baseball diamond, one (1) fishing lake, a large farmer's market/festival pavilion and festival grounds, multi-use trails, one (1) proposed wetland with boardwalk, preservation of existing wetlands, a playground and shade structure, and the associated parking for the aforementioned facilities. It is anticipated that this activity will be completed over two phases of construction. The site will be terraced and tie into the existing grades along the identified T.V.A. easement. Approximately 19 acres will be raised above the floodplain and approximately 275,000 cubic yards of net fill will be required. Site grading up to the 100-year flood elevation will be balanced. The site will be graded down to match the existing elevation at the 250-foot wide T.V.A. easement along the southern portion of the property. Due to the increased elevations at Rodney Baber Park, a 1:1 stormwater mitigation will be required to compensate for the additional fill on-site in the existing floodplain. The majority of the fill material required to meet the mitigation requirements will be taken from the proposed wetland and fishing lake in Rodney Baber Park and also from John F. Kennedy Park which will compensate for the 1:1 mitigation requirement.

***John F. Kennedy Park***

John F. Kennedy Park (Kennedy Park) is located south of Raleigh-Lagrange Road and northeast of Interstate 40 on a parcel owned by the City of Memphis. The property is roughly 260 acres, but the activity site will only disturb approximately 32.2 acres. The concept for Kennedy Park includes replacing

five existing baseball/softball diamonds with approximately four soccer fields, a paved trail, which incorporates approximately 54,000 square feet of the proposed bicycle/pedestrian trails throughout the park connecting to the Wolf River Greenway, linking the park to the Midsouth Greenprint in two places. Some of the soccer fields will be re-graded to serve as detention during intense storm events. The site grading will result in a net excavation of approximately 155,000 cubic yards from the floodplain. The excavated material will be transported and used as fill in Rodney Baber Park. Two (2) new wetlands will be created south of the proposed soccer fields. The proposed improvements to Kennedy Park are anticipated to be completed in two phases of construction.

### ***Orchi Road***

Orchi Road is located east of Highland Street, north of Chelsea Avenue, and west of Jackson Avenue. During the 2011 storm event, stormwater collected on the north side of the Orchi Road and eventually overtopped the road and flooded 19 homes. The proposed activity entails construction of a flood control berm on the north side of Orchi Road, between Highland Street and Hanson Road. A land parcel owned by Shelby County north of Orchi Road will be utilized to create a wetland pond. This area will also serve as a detention facility to store the stormwater that was overtopping the roadway to prevent impacting additional properties. The excavated material will also provide fill material for the berm and fill at Rodney Baber Park.

Orchi Road will be reconstructed as a complete street with bicycle facilities along the north side of the road providing a direct connection from the surrounding low and moderate income (LMI) neighborhoods to the Wolf River Greenway. Sidewalks and street trees will be incorporated on each side of Orchi Road for pedestrian access.

Shelby County Government has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values:

The construction documents for the Wolf River Wetland Restoration and Greenway project will be reviewed and coordinated with the City of Memphis, the Local Floodplain Administrator, to certify that these Phases will have no have no significant net effect on the designated wetland and floodplain.

Shelby County Government has reevaluated the alternatives to building in the wetland and floodplain and has determined that it has no practicable alternative. Environmental files that document compliance with steps 3 through 6 of Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments. This activity will have no significant impact on the environment for the following reasons:

1. Earthwork operations in Rodney Baber Park are balanced up to the 100-year flood elevation (for every cubic yard of fill material added, there is a separate cubic yard of excavation elsewhere on the site.) The public-use site features at the park are being further raised above the floodplain, resulting in a net fill for the site.
2. Earthwork operations in Kennedy Park will result in a net excavation from the floodplain, providing additional storage on the site.
3. A detail wetland and waters delineation survey and report has been completed by Brophy-Heineke and Associates, Inc. to identify existing wetlands and water courses that would be impacted and affected by these improvements. The proposed site grading and location of features were altered to avoid impacts to existing wetlands and to minimize the impact to significant trees.

4. An Endangered Bat Habitat Survey is underway and will identify any potential tree snag habitat within the project sites. The site grading and site features will be adjusted to avoid removal of tree snags where possible. If avoidance is not possible, then the site grading and features will be modified to limit the impact as much as possible.

There are three primary purposes for this notice. First, people who may be affected by activities in wetlands and floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information about wetlands and floodplains can facilitate and enhance Federal efforts to reduce the risks associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in wetlands and floodplains, it must inform those who may be put at greater or continued risk.

Additional information on the proposal may be obtained by contacting Drake Danley at (901) 374-9109.

Written comments must be received by Shelby County at the following address on or before **April 26, 2018**:

**Kimley-Horn and Associates, Inc.**  
**Attention: Drake Danley**  
**6750 Poplar Avenue, Suite 600**  
**Memphis, TN 38138**

during the hours of 9:00 AM to 4:00 PM.

Comments may also be submitted via email at: [Drake.Danley@kimley-horn.com](mailto:Drake.Danley@kimley-horn.com)

**Date: April 1, 2018**

Attest:

Mark H. Luttrell, Jr. Mayor  
Shelby County, Tennessee