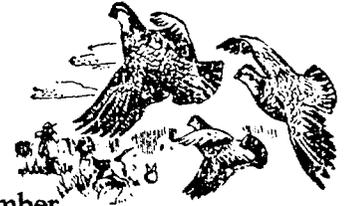


# Yell County Wildlife Federation

Route 3, Box 223

Dardanelle, Arkansas 72834

October 2, 2001



Jim Wood, Member  
Board of Directors  
Yell County Wildlife Fed.  
Route 3 Box 1278  
Dardanelle, AR 72834

Regional Administrator, Region IV  
US Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064

Dear Sir or Madam:

Please find enclosed a copy of Yell County Wildlife Federation's comments regarding solicitation by FTN Associates as to whether a proposed \$50 million Intermodal Transportation System by the City of Russellville, AR should require the Sponsor to develop a Environmental Impact Statement. The three Phase, 1,800 acre proposed project involves at least eleven federal Agencies and contains an equal number of components. The Project plan contains a proposed Regional Airport, an issue that was previously visited in 1977-80 by FAA, EPA and NRC who objected to sponsors preferred site due to imposing aircraft activity around Holla Bend National Wildlife Refuge and threat of heavy aircraft colliding with Arkansas Nuclear I powerplant.

We conclude that it is fundamentally impossible for Project Sponsors to comply with the NEPA Process mandate without the comprehensive analysis and documentation benefits provided by an EIS. This proposed action interacts with a multitude of resources. Some of these are Base Flood determinations, Floodplain Management, Wetlands, community safety and the 1977 rejuvenated issues regarding Regional Airport locations.

The comment deadline is October 9. Should you have questions regarding this proposed project or the enclosed comments, please call me at 501-229-4449.

Best Regards,

*Jim Wood*

Jim Wood

Yell County Wildlife Federation



To: FTN Associates  
ATTN: Intermodal Project  
3 Innwood Circle, Suite 220  
Little Rock, AR 72211

October 2, 2001

From: Jim Wood  
Yell County Wildlife Federation  
Route 3 Box 1278  
Dardanelle, AR 72834

Ref: September 18, 2001 River Valley Intermodal Authority Notice of Public Involvement Meeting and solicitation of comments regarding development of an Environmental Assessment for a proposed Intermodal Transportation System sponsored by the City of Russellville, AR and Pope County.

We appreciate the opportunity to participate in helping build and identify the EA information base and apply the National Environmental Policy Act's (NEPA) procedural provisions at 40 CFR 1500-1508 and other participating Agencies with implementing regulations that apply to this proposed action.

Federal Agencies that we think have a regulatory decision-making NEPA Process role in this proposed comprehensive Intermodal Project include the US Army Corps of Engineers, US Dept. of Commerce, Federal Highway Administration, US Fish & Wildlife Service, Economic Development Administration, US Dept. of Agriculture, Environmental Protection Agency, Federal Aviation Administration, Federal Railroad Administration, US Nuclear Regulatory Commission, Federal Emergency Management Agency and may include other federal agencies. All these participating Agencies have their own NEPA regulatory guidance that supplement CEQ's 40 CFR 1500-1508.

Yell County Wildlife Federation is a River Valley sportsman organization that was formed in 1946 and continues to be a local affiliate of Arkansas Wildlife Federation. Our membership consists primarily of sportsmen, rod and gun enthusiasts, and others who promote wise management of our wildlife resource and the rivers, floodplains, lakes, wetlands, forests and other habitat upon which fish and wildlife depend. We will offer substantive comments on the proposed action throughout the NEPA Process.

#### STUDY BACKGROUND SITUATION

1. Our organization has a long-standing interest and past participation in some elements of this currently proposed Intermodal Project. The controversial Regional Airport location, previously studied and denied/dropped in 1980, resurfaces as part of this more comprehensive Intermodal Facility. This project proposal again raises much the same concerns for potential adverse impacts to community safety, natural floodplain functions, and integrity of the nearby Holla Bend National Wildlife Refuge with its traditional high seasonal waterfowl activity between the Refuge and Lake Dardanelle. NRC declared on 4-25-00 regarding the proposed Airport site "NRC staff will perform additional reviews

if a proposed airport progresses to the point where a formal Environmental Assessment is prepared". NRC concluded (August 11, 1980) for a site near this currently proposed airport location "that the proposed airport relocation has the potential for becoming a hazard to the operation of the nearby nuclear power station, and hence, can pose an undue risk to the health and safety of the public in the area". EPA concluded (July 30, 1980), "If a large aircraft crashed into the containment dome of the nuclear plant, the results could be environmentally devastating". These community safety issues, along with floodplain management continue to be of public concern, and the Corps of Engineer refusal, during development of their Section 107 Report, to favorably respond to a request (1-3-00) for a public hearing on the same by Dardanelle residents was inappropriate and should be reviewed within the Agency. Need for each of the eleven Project components and their location relies upon a scheme of "piggy-backing" one upon the other---each producing a decision in principle that the other is needed.

2. We continue to have difficulty securing, from private project sponsors, site-specific clarification of the extensive proposed development and potential impacts to the affected Human Environment, sufficient to adequately represent our interest in applying the NEPA Process. Without a site-specific, detailed, Project description, it is near impossible to measure cumulative environmental consequences and the sphere of influence posed by the comprehensive nature of the proposed Intermodal development. Limiting multi-phase project (Phase 1) Scoping to drawing a line around a USGS mapped, 900 acre, area falls measurably short of project clarification essential to identify the range of practical alternatives to floodplain/wetland/prime farmland development, base flood impacts, cultural and other affected resources. Without a clear description of the proposed action, it is also impossible to apply Mitigation as described by NEPA at 40 CFR 1508.20. Therefore, much of our concerns and issues are presented from previous reviews, our own information base, and regulatory guidance secured from federal Agencies that share, in some measure, Project and EA development.

3. The private Sponsor, along with the US Army Corps of Engineers, seem to have noticeably pursued over the past two years, an on-going biased fragmented Project environmental documentation and information gathering process without meeting NEPA's public involvement test. The Sponsor's role and the Corps of Engineers have so far failed the, "diligent efforts to involve the public", test at 40 CFR 1506.6, especially for studying a major resource trade-off action that is highly controversial and produces major and significant impacts to communities and resources outside the sponsoring City of Russellville. Over this past 2 year period, there has been no federal Lead Agency monitoring over-site to assure regulatory compliance by the Sponsor or the Corps of Engineers for NEPA public involvement, notwithstanding public hearing requests on 1-3-00 by Yell County Wildlife Fed., and the same by Dardanelle Mayor Carolyn McGee on 1-4-00. A study process bias is obvious when the Project Sponsor has been privileged to employ private firms to engage in data gathering while ignoring the public's entitlement under NEPA to help Scope the Issues. This employee/employer relationship seems to be naturally biased towards pleasing the employer/sponsor more-so than objectively applying the NEPA Process.

4. Implementing the NEPA Process for this 1,800+ acre development involves resource decision-making by at least eleven separate federal Agencies, and is thus highly “government in nature” and difficult for private firms to meet the test of thoroughness and objectivity. Gen. Robert Flowers, US Army Corps of Engineer’s Commander, recognizes this problem in his 2001 White Paper declaration that, “We do not, can not, and will not favor any special interest, nor allow any special privileges, in the execution of our studies and projects”. A “special privilege” conflict of interest example is presented in the private sponsors July 9, 2001 notice “to delineate Section 404 wetlands”, and then following wetlands delineation, the Sponsor applies to the Corps of Engineers for a Sec. 404 permit to dredge & fill the same wetlands the developer previously delineated. This circumstance fails to restore public “trust and confidence” in the Corps of Engineer’s CWA Section 404 permitting process. Does 18 USC Sec.1001, Chapter 47, “Fraud and False Statements” penalties apply equally to private firms doing NEPA documentation as it does to federal government officials?

5. Sponsor and the Corps of Engineers continue to pursue NEPA documentation through breaking the Project down into component parts for separate analysis, in a scheme to avoid reaching the threshold of “significance”, thus requiring a comprehensive EIS. 40 CFR 1508.27(b)(7) specifically requires that, “Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts”. It is also the Policy of the Federal HWY Administration that, “to the fullest extent possible, all environmental investigations, reviews, and consultations be coordinated as a single process” (23 CFR 771.105).

6. With regard for these and other regulatory guidance applicable to the eleven participating Federal Agencies listed above, we conclude that it is unrealistic to expect to meet the “to the fullest extent possible” NEPA Sec.102(2) requirement, and evaluate a reasonable range of alternatives for such a large project, without pre decision benefit of a full Environmental Impact Statement (40 CFR 1508.11). Thus we recommend that it would be appropriate, in the public interest, and less confusing, to forego EA development, hold all Project activity in abeyance until such time as a Draft EIS is produced through the NEPA Process, as provided at 40 CFR 1501.3(a). In addition, the Sponsor should inform the public as to the risk of pay-back obligations for state grants or other funds, should some of the proposed Project components fail to receive approval or undergo substantial modification.

#### PROJECT BASELINE SITUATION FROM WHICH TO MEASURE AND ISSUES THAT SHOULD BE ANALYZED THROUGH THE NEPA PROCESS

The beginning No Action, starting baseline situation calls for major commercial development of a large portion of Prime Farmland/Wetlands and the Ark. River Base Floodplain, where the south side is levee protected and the north side proposed for encroachment is now an open floodwater surge area used for crop farming. The proposed Project development area contain numerous historical and cultural sites, due to early Indian occupation and a highly populated Cherokee community. In addition, existing privately owned nearby economic enterprises now engaging in activities similar to those

proposed by the Project will be subjected to unfair competition. Privately owned components of an Intermodal Transportation System are now located adjacent to the proposed Project site and expand as needed to meet demand. This includes the four lane HWY 7 that connects to I-40, Bruce Oakley, Inc. Port of Dardanelle, Russellville Airport and Dardanelle & Russellville Railroad which connects to the nearby Union Pacific line.

- (a) The Project site is declared to be a 1,800 acre development with an additional 1,000 adjoining acres available for adding to the facility (Russellville Courier 7-17-01).
  - (1) How much of this proposed Project acreage involves development of Base Floodplains, wetlands, or replaces Prime Farmland? (2) This analysis is essential to applying EO 11988, EO 11990, 44 CFR 9, ER 1105-2-100, EP 1165-2-1, 7 CFR 658 and other regulatory guidance.
- (b) The estimated \$40-50 million planned project is declared by the Sponsor and the Corps of Engineers (Section 107 Report) to be a connected facility that includes a slack-water harbor on the Ark. River, a Regional Airport with a 7,000 foot (expandable to 10,000 feet) Runway and Air Freight Terminal, a railroad connected to the Union Pacific System, a new highway connection to I-40, rail-truck terminal, truck break-bulk terminal, rail marshalling yard, rail and truck dock warehousing, freight management communication system, foreign trade zone and industrial park for industries that need waterway access. The Corps now takes the position that the SW Harbor is a separate project in itself (a stand-alone action for NEPA purposes) and confirms that, "The Intermodal Facility is not dependent upon the slack water harbor".
  - (1) How many of these listed Intermodal components are dependent upon location within the floodplain? (2) Is property outside the floodplain available for developing these components listed above at (b)? (3) Can the Facility qualify as an Intermodal Project without a Slack Water Harbor or floodplain development? (4) EO 11988/11990 declares that preserving floodplain and wetland functions is in the public interest, would it seem contradictory for the Corps of Engineers to develop their Section 404 Public Interest Review with a finding contrary to these two EO's?
- (c) The entire Project is being pursued primarily as a \$40-50 million federal funded land development scheme involving Base Floodplains, Prime Farmlands and Wetlands.
  - (1) Corps of Engineers EP 1165-2-1, 12-1, provides that projects not be undertaken to "enhance and primarily benefit land development schemes".
  - (2) Does this proposed Project meet the COE Policy test of being a land development scheme?
- (d) A major portion of the Project is planned to sit in the New Hope Bottoms adjacent to the Ark. River and require dredge, fill and levees, that create extensive encroachment upon the Base Floodplain. The proposed action adversely impacts Natural Floodplain Functions, Floodway carrying capacity, and will obviously raise Base Flood elevations for City of

Dardanelle, Veterans-Riverside Park and property owners sharing the south portion of the common floodplain, including agricultural lands.

- (1) Will this Project comply with CWA Section 404 permit guidance of avoiding direct or indirect support of floodplain development? (2) What are the likely Project induced changes to floodplain carrying capacity, Base Flood levels, exacerbation of levee blow-outs, and floodplain/wetland ecology?
- (e) No effort has been undertaken to study practical Slack-Water Harbor alternative locations outside the Base Floodplain on Lake Dardanelle, that would be directly adjacent to I-40, as well as the Union Pacific main line and avoid adverse impacts altogether upon natural floodplain functions. (1) Since the Corps now declares the SW Harbor to be a “stand alone” separate facility in itself, what practical alternative Port sites on Lake Dardanelle outside the floodplain, near already existing highway and rail could be utilized? (2) Would utilizing the already available private Port of Dardanelle be a reasonable alternative to a new SW Harbor?
- (f) The riverside City of Dardanelle has a delineated Base Floodplain and participates in the National Flood Insurance Program. The City sits in a critical flood situation with a delineated 320’ Base Flood (100 year) elevation opposite the Project on the South bank of the AR River. The Corps of Engineer Sec.107 Report declares the proposed Project’s Base Floodplain elevation to be 322.1’ with an intent to levee off the floodplain to 324’ elevation, or 4’ higher than Dardanelle’s Base Floodplain. Both the City and Project equally share the Base Floodplain and Project induced impacts to Base Flood elevations. Neither the Project Sponsor nor Corps of Engineers have fulfilled their regulatory obligation to coordinate Base Floodplain development with City of Dardanelle who utilizes the floodplain for their “open space” Veterans-Riverside Park Complex. In addition, Dardanelle Waste Water Treatment Plant sits at the 320’ Base Flood elevation, as well as other private property within the City. (1) What impacts to the City of Dardanelle Base Floodplain delineation will result from levees planned for the north part of the Base Floodplain? (2) How can the Base Floodplain elevation be 322.1’ on the north side of the river and be two feet lower at 320’ elevation on the south side of the river? (3) What Project induced land value/salability and flood insurance rate impacts could likely result to Dardanelle property owners through 12 CFR 339? Is it possible to evacuate the Project area’s 485,000 cfs Base Flood by squeezing out part of the flowage area without raising flood levels? (4) For what purpose has the Sponsor and Corps of Engineers chosen not to coordinate floodplain development planning with City of Dardanelle as provided by 44 CFR 60.22(c)(10)?
- (g) The Ark. River historically uses the open north portion of the floodplain, proposed for development, as a floodwater surge area, which relieves pressure on the south levee used to protect Dardanelle, Holla Bend Refuge and Dardanelle Bottoms. This levee annually fails the Corps reliability test as well as FEMA’s criteria for flood damage reduction. Directly below the

Dardanelle Waste Water Plant at River Mile 200 is a Corps of Engineer recognized critical flood blow out area (COE Sept. '97 Study, pg. VII-14) where Sponsor's proposed flood plain encroachment/development will obviously intensify levee blow-outs. All floodwater now discharging through this critical blowout area must pass through the old riverbed area of Holla Bend Refuge in order to re-enter the Ark. River, due to the Holla Bend Cutoff completed in 1957. This cut-off now means sand and silt transport through levee blow outs at mile 200 would likely devastate the Refuge's capability to meet wintering waterfowl habitat needs. Proposed tinkering with natural floodplain functions could adverse impact Holla Bend National Wildlife Refuge which is a mitigation element of the Ark. River Navigation System to compensate for wetland loss along Ark. River. Since 1913, the river at mile 200 has receded 4,000 feet to the south.

(1) In what measure will proposed floodplain development/levees intensify flooding or levee failure near mile 200? (2) What is the historical record (100 year) of flood blow-outs at mile 200 and what has been the measure of sand/sediment deposit resulting from these flood blow outs? (3) What is revealed about levee stability and condition through the Corps of Engineers annual levee inspections in the Dardanelle Bottoms? (4) What program is in place to maintain, repair or upgrade this levee system that could be adversely affected by Project impacts that raise Base Floodplain elevations?

- (h) The commercial tax paying Port of Dardanelle, including its rail/truck terminal, warehouse, docks, grain elevators and equipment is privately owned and operated and sits nearby the proposed Intermodal Facility's federally subsidized SW Harbor location. The Corps of Engineers Project Report & EA bases their favorable cost-benefit analysis on shipping the same commodities through the proposed SW Harbor that are now handled by the Port of Dardanelle. The federally constructed SW Harbor, terminal, docks, warehouses and support facilities will directly compete for the same services now provided by the Port of Dardanelle, and adversely affect the private ports economic health. There continues a downward trend in demand and underutilized capacity of Ark. River barge transportation and port use. The Economic Development Administration regulations at 42 USCA 3148 provides that, "No financial assistance under this Act shall be extended to any project when the result would be to increase the production of goods, materials, or commodities, or the availability of services or facilities, when there is not sufficient demand for such goods, materials, commodities, services, or facilities, to employ the efficient capacity of existing competitive commercial or industrial enterprises". (1) It is our opinion that a NEPA analysis must address the Issue of Prevention Of Unfair Competition regarding each proposed Project component and that this Statute and the Issues it generates must also apply to the Corps of Engineers already studied Slack Water Harbor.
- (i) The entire Intermodal Facility is pursued under the "Regional Intermodal Facilities Act", a state statute that exempts the Facility from all state, local

and municipal taxes of any kind. Removing current property, within the proposed area to be developed, from its current taxpaying status to a non taxpaying circumstance is an economic issue that must be subjected to accurate accounting and analysis as part of the Human Environment/ NEPA Process. (1) Specifically, how and who will pay for each Project component? (2) Will affected taxing subdivision assessments gain or lose, and what will be their measure of gain or loss?

- (j) The Corps 1997 navigation study identified sand-bar habitat common to part of the floodplain proposed for development as containing Least Tern nesting activity, also this riverside wintering habitat is used by the American Bald Eagle. The Least Tern is an Endangered Species and the Bald Eagle is either Threatened or recovering. (1) How will developing the Base Floodplain protect nesting habitat of the Least Tern and accommodate needs of the Bald Eagle?
- (k) All acreage within the proposed area of development should be certified and updated through Determination and Delineation of Wetlands as well as Delineation of Prime Farmlands under the Farmland Protection Policy Act guidance at 7 CFR 658. Delineating both these resource areas should be undertaken by the USDA Natural Resources Conservation Service. Seasonal wetlands and croplands within the entire New Hope Bottoms, due to their close proximity to Holla Bend Wildlife Refuge, provide high value wintering waterfowl habitat and forage areas. This Refuge supports the North American Waterfowl Plan and mitigates waterfowl habitat loss resulting from the AR River Nav System. (1) What will be the impacts produced upon waterfowl needs as a result of converting about 1,000 acres of this floodplain from agriculture production to commercial industrial development? (2) How are Mitigation of adverse impacts upon wetlands and waterfowl forage needs to be addressed in the EA analysis? (3) How much of the area proposed for development is now enrolled in an NRCS Wetland Reserve/Conservation Reserve Program or withdrawn for a committed time frame from crop production under other federal programs that preclude conversion to commercial or industrial purposes?
- (l) Cost benefit analysis for each studied environmentally different alternative must account for both quantifiable and un-quantifiable amenities and values that may be affected. Congress and the President through Executive Orders declare that Wetland and Floodplain functions have beneficial values. Preserving these values are a site specific public benefit that must be assigned value for each alternative considered.
- (m) The proposed Regional Airport is planned as a connected part of the Intermodal Transportation System and is included in the Introduction and Need Sept. 18 hand-out sheets. It is also included as part of the Corps of Engineers SW Harbor Section 107 Report and EA. Annual waterfowl use and travel patterns along the 5 mile river corridor, that connects the 7,055 acre Holla Bend Refuge with Lake Dardanelle Wildlife Management Area, is noticeably heavy during winter months. Populations usually reach 30,000 ducks and an equal number of geese. In addition, one-time/one-day

Refuge winter surveys counted up to 50 Bald Eagles, 3,078 cormorants, 150 pelicans and 3,774 ring-bill gulls. The Project's proposed Regional Airport component site would put landing and exiting aircraft through this corridor of daily bird activity. Ingesting waterfowl into jet engines is not compatible with preserving aircraft and community safety as evidenced by a September 1995 incident at Anchorage, AK where a Boeing 747 Air Force plane collided on take-off with a flock of geese, causing engine failure, and crashed killing all 24 crew members. (1) With Dardanelle School complex (1,500+ students) and City of Dardanelle close by the proposed Regional Airport entering/exiting corridor, how will issues of Ark. Nuclear I and community safety be mitigated?

## REASONABLE ALTERNATIVES

CEQ Regulations at 40 CFR 1500-1508 not only apply to an EIS but to the whole of NEPA Sec.102(2) and EA's, and therefore require "to the fullest extent possible" consideration of a wide range of reasonable alternatives for developing this proposed Intermodal Transportation System by the City of Russellville and Pope County. Under the NEPA Process, fragmenting the proposed action by breaking it down into small pieces/phases to avoid "significance" is not allowed. The proposed 3 alternatives presented by the Project Sponsor at the Sept. 18 meeting are close enough in design to be practically a repeat of each other, not a range of available alternatives to address resource concerns. As a minimum, the range of alternative should include:

- 1 No Action (a full NEPA evaluation of the existing baseline situation).
- 2 Preferred Alternative
- 3 Alternative that avoids interference with Base Floodplain functions, Wetlands, Prime Farmland, Waterfowl Habitat and Holla Bend Refuge.
- 4 Alternative that avoids adverse impacts to City of Dardanelle Base Floodplain levels, property owners and Flood Insurance Rate Mapping.
- 5 Alternative that avoids taking land from unwilling sellers.
- 6 Alternative that avoids unfair competition with existing and future private economic enterprise.
- 7 Alternatives that locate the Regional Airport and aircraft activity well beyond the AR Nuclear I ten mile Emergency Zone and Holla Bend Refuge.

## SUMMARY

This proposed \$40-50 million Intermodal Transportation System, Slack Water Harbor and Industrial Park appears to be pursued as a scheme to largely use federal and state money to fill, levee and develop the AR River Base Floodplain into a 1,000+ acre flood prone commercial industrial complex, in preference to locating the facility on available land outside the floodplain. Any CWA Section 404 permit applications submitted to the Corps of Engineers should be processed as "Individual Permits" and not under the

Nationwide or Regional process. The SW Harbor and support facilities will directly compete with and likely drive the private Port of Dardanelle out of business. There are many federal regulatory constraints that identify this proposed Project as being outside the public interest and far more practical less controversial locations are available that better comply with these regulations and much more likely to gain greater local support. It is factually impossible to reduce the size of the AR River floodplain flowage/ surge area, and accommodate the 100 year flood (485,000 cfs at Dardanelle), without raising Base Flood elevations. A full EIS provides the necessary study mechanisms and thoroughness needed to sharply define impacts the Projects is likely to produce upon the City of Dardanelle Base Flood elevation.

We appreciate the opportunity to comment on this proposed action and recommend that this comprehensive proposed Intermodal Transportation System meets the NEPA test of being a major and significant federal action that qualifies for a full Environmental Impact Statement.

Submitted by: Jim Wood, Member  
Board of Directors  
Yell County Wildlife Federation  
Route 3 Box 1278  
Dardanelle, AR 72834



cc file

Honorable Carolyn McGee  
Mayor of Dardanelle  
PO Box 360  
Dardanelle, AR 72834

Col. Benjamin Butler  
Little Rock District Engineer  
US Army Corps of Engineers  
PO Box 867  
Little Rock, AR 72203-0867

Ms Linda Delmor  
Federal Emergency Management Agency  
800 North Loop, 288  
Denton, TX 76209

Jonathan L. Markley, Ph.D.  
Regional Environmental Officer  
Economic Development Administration  
Austin Regional Office  
327 Congress Ave., Suite 200  
Austin, TX 78701-4037

Allan J. Mueller  
US Fish & Wildlife Service  
1500 Museum Road, Suite 105  
Conway, AR 72032

Hugh Durham, Director  
AR Game & Fish Commission  
2 Natural Resources Drive  
Little Rock, AR 72205

Mickey Evans  
Pope Co. Conservation Dist.  
420 No. Hampton, Suite B  
Russellville, AR 72802

Mr. Randal Looney  
Federal Highway Administration  
700 West Capitol Ave., Room 3130  
Little Rock, AR 72201-3298

Mr. Rodney Clark  
Federal Aviation Administration  
Arkansas/Oklahoma ADO, ASW-630F  
Ft. Worth, TX 76193-630E

Gregg Cooke, Regional Administrator  
US EPA, Region 6  
First Interstate Bank Tower  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Regional Administrator, Region IV  
US Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-8064