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ASHLAND MISSISSIPPI 161-KV DELIVERY POINT ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

Benton and Marshall Counties, Mississippi

Prepared by:
TENNESSEE VALLEY AUTHORITY
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Purpose and Need for Action

In order to maintain reliable electric service in the Ashland, Mississippi area, Holly Springs Utility Department (HSUD), a distributor of Tennessee Valley Authority (TVA) power, plans to build a new 161-kV Ashland Substation on the west side of the intersection of Lamar Road and County Church Road, approximately 0.5 mile west of Highway 5 in Benton County, Mississippi. TVA proposes to provide power to the new substation by constructing, operating, and maintaining approximately 15 miles of new 161-kilvolt (kV) transmission line (TL).

TVA plans its transmission system according to industry-wide, accepted North American Electric Reliability Corporation standards. The Ashland, Mississippi area is currently served by a single 46-kV TL that extends from the Holly Springs 161-kV Substation to the Ashland 46-kV Substation. This existing TL has been in place since 1965, and is reaching the end of its useful life; it needs significant maintenance or replacement due to the age and condition of the existing wooden poles. In addition, the existing 46-kV substation in Ashland is more than 50 years old, and is reaching obsolescence. Improving the transmission system in this area will enable TVA and HSUD to provide sufficient and reliable electric service for the Ashland area.

The Proposed Action Alternative – Improve Power Supply

The new proposed TL would be built beside the existing Holly Springs-Ashland 46-kV TL, and would use new steel pole structures. The new line would be built on a 100-foot-wide right-of-way (ROW) consisting of 37.5 feet of existing ROW and 62.5 feet of new ROW, and would connect TVA's existing Holly Springs-Miller 161-kV TL to HSUD's new substation (Figure 1-1). TVA would purchase easements from landowners for the new ROW. These easements would give TVA the right to construct, operate, and maintain the 15 mile TL, as well as remove trees that are located beyond, but adjacent to the cleared ROW, and that are tall enough to potentially impact a TL structure or conductor if the tree should fall.

TVA would also dispose of their metering equipment at the existing 46-kV substation, provide new metering equipment for the local power company to install in the new substation, and replace relays at the Miller and Holly Springs 161-kV substation to accommodate the new TL. Temporary access roads would also be constructed in order to facilitate access to the new TL and associated structures. The proposed TL ROW and the addition of temporary access roads would total approximately 178 acres of disturbance in Benton and Marshall Counties, Mississippi.

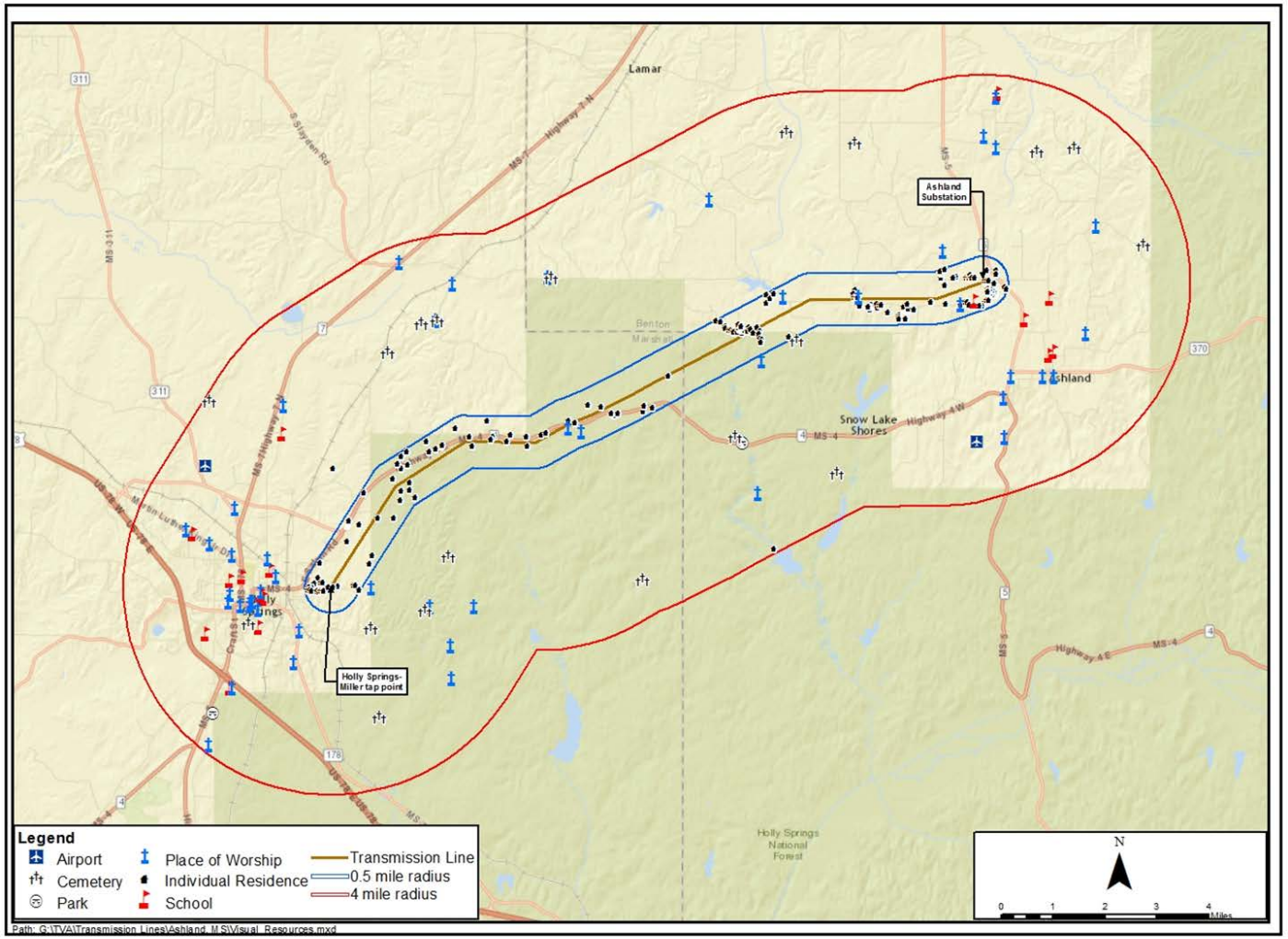

FIGURE 1-1: Proposed Route for the Ashland 161-kV Transmission Line

No Action Alternative

If TVA does not take the proposed action, TVA would not construct the proposed TL to serve HSUD's planned Ashland 161-kV Substation. The TVA power system in the local area would continue under the current operating conditions. As a result, the TVA power system would be at increasing risk for loss of service. HSUD could decide to construct a TL and request a connection point at an existing TVA TL. In this event, the overall environmental consequences would be similar to the Action Alternative depending on the route chosen by HSUD. Taking no action is included in this analysis to provide a baseline for comparison of project impacts and benefits.

Decision to be Made

The decision before TVA is whether to provide power to the new HSUD 161-kV Ashland Substation by constructing, operating, and maintaining approximately 15 miles of new TL beginning at its Holly Springs-Miller 161-kV TL.

Scoping Process and Public Involvement

In 2014, TVA conducted an informational open house with various alternative routes to provide stakeholders, property owners, and other interested public with information about the value and need for the project. There has been no noted opposition to the project. Additionally, TVA contacted the following federal and state agencies, as well as federally recognized Native American tribes, concerning the proposed project:

- The Chickasaw Nation
- Choctaw Nation of Oklahoma
- Jena Band of Choctaw Indians
- Mississippi Band of Choctaw Indians
- Mississippi Department of Archives and History (State Historic Preservation Office)
- United States Fish and Wildlife Service (USFWS)
- United States Forest Service (USFS)

Affected Environment and Anticipated Impacts

Site Description

The entire project stretches over 15 miles and occupies approximately 178 acres in Benton and Marshall counties, Mississippi. The project is located in the Loess Plains subregion of the Mississippi Valley and is characterized by gently rolling to irregular plains. Once a highly productive agricultural area, this region is now dominated by pine plantations and mixed forest landscape, although some cropland agriculture, including cotton and soybeans, is still present. There are a variety of natural landscape features located within the project site, such as fragmented forest habitat, wetlands, stream crossings, agricultural lands, and residential or otherwise disturbed areas. Approximately 94 acres of the project footprint are comprised of forest. Each of the existing varying ecological community types offers suitable habitat for species common to the region, both seasonally and year-round. For more detailed information on the existing conditions of the project site, please refer to each individual resource identified in Attachment 1.

Environmental Impacts

TVA has reviewed the proposed project for potential environmental impacts related to the construction, operation and maintenance of the proposed TL and associated access roads. Alternatively, TVA reviewed the potential environmental impacts of taking no action. Under

the No Action Alternative, the area within the proposed ROW and access roads would remain in its current condition, and no project related impacts would occur to the resources identified herein.

The early internal review process looked at both alternatives and identified all resources present within the project area. TVA documented that the Proposed Action Alternative would not significantly affect certain resources by completing a Categorical Exclusion Checklist (Attachment 1). In the Checklist, TVA documented the effects to: groundwater, geology, surface water, aquatic ecology, floodplains, aesthetics, socioeconomics and environmental justice. Impacts to the following resources were evaluated in further detail:

- *Vegetation*
- *Wildlife*
- *Threatened and endangered species and their critical habitats*
- *Wetlands*
- *Archaeological and historic resources*
- *Recreation, parks, and natural areas*

The results of those additional analyses, and TVA's determination that the proposed action would not significantly affect these resources, are summarized in this Environmental Assessment and Finding of No Significant Impact.

Vegetation

Field surveys were conducted in September 2015 and February 2016 to document plant communities, infestations of invasive plants, and to search for possible threatened and endangered plant species along the proposed ROW and access roads. The proposed project would require clearing of approximately 94 acres of forest, which represents .067 percent of the 1,400,000 acres of forest land in Benton and Marshall and seven surrounding Mississippi and Tennessee counties as of 2013 (U.S. Forest Service 2015). Moreover, these forested communities are common and well represented throughout the region. Therefore, converting forest land to managed ROW for construction of the proposed TL would be long term in duration, but insignificant.

Project-related work would temporarily affect herbaceous plant communities, but these areas would likely recover to their pre-project condition in less than one year. The entire project area currently has a large component of invasive terrestrial plants and the proposed project would not significantly affect the extent or abundance of these species at the county, regional, or state level. TVA will employ its standard Best Management Practices (BMPs) which include revegetating the ROW with noninvasive species in order to minimize the potential introduction and spread of invasive species in the project area. Therefore, the proposed project would not significantly affect the terrestrial ecology of the region.

Wildlife

Habitat assessments for terrestrial animal species and associated suitable habitat were conducted in the field August 18 and 19, 2015 and on February 17, 2016, on the 15-mile long proposed project site. Impacts to wildlife habitat are based on the assumption that disturbance would occur across the entire property for transmission line and access road development (grading, vegetation removal, etc.). Any wildlife (primarily common, habituated species) currently using these already heavily disturbed areas would be displaced by habitat removal. As documented in the attached Checklist (Attachment 1), there may be direct effects to some individual members of species common to the area if they are

immobile during the time of construction, particularly if construction activities take place during breeding/nesting seasons. However, the actions are not likely to affect the overall populations of species common to the area, as similarly forested and herbaceous habitat exists in the surrounding landscape. Therefore impacts to wildlife would not be significant.

Threatened & Endangered Species

Botany

Review of the TVA Regional Natural Heritage Database (queried August 2015) indicated that no federally listed plant species and four state-listed plant species have been previously reported within a five-mile vicinity of the project area. Of the four species previously reported, two state-listed species were observed during field surveys of the proposed ROW in September 2015 and February 2016: the *Nondo lovage*, also known as Canadian licorice root, and the whorled mountain-mint. As documented in the attached Checklist (Attachment 1), *Nondo lovage* would be negatively affected by implementation of the Action Alternative, but the impacts would not be significant as the species was found in three additional areas located approximately 400 to 800 feet outside of the proposed ROW. The state-listed species whorled mountain-mint is also very rare in Mississippi and has only been previously observed at three locations in the state. TVA will implement the necessary BMPs and mitigation measures (see mitigation measures section below), as appropriate, to ensure no direct or indirect significant impacts to the whorled mountain-mint would occur.

Aquatic

A review of the TVA Regional Natural Heritage Database (queried August 2015) was conducted for Benton and Marshall counties and a 10-mile radius of the proposed project. The results indicated no federally listed species or federally designated critical habitat are known to occur within that area, and six state-listed aquatic species have the potential to occur: mud darter, northern madtom, Yazoo Darter, fatmucket, rayed creekshell, and southern rainbow. Five of the six occur in the Wolf River, a northwestern-flowing tributary of the Mississippi River, which comes within approximately 4.5 miles of the northeastern end of the proposed TL route.

The six state-listed species could potentially be impacted directly by the alteration of habitat conditions within the stream, or indirectly due to modification of the riparian zone and storm water runoff resulting from construction and maintenance activities along the TL corridor and associated access roads. However, with proper implementation of BMPs, such as Streamside Management Zone (SMZ) Protection (Appendices 3-1 & 3-2 of Aquatic Input in Attachment 1) and adherence to US Army Corps of Engineers (USACE) 404 Permit requirements, no significant impacts to the species are anticipated to occur (see mitigation measures below and Attachment 1).

Terrestrial

A review of the TVA Regional Natural Heritage database in March 2016 resulted in one documented occurrence of one federally listed terrestrial animal (American burying beetle) within three miles of the project area (see Attachment 1). While suitable habitat for American burying beetle likely exists within the project footprint, this species is believed to be extirpated from the state of Mississippi, as well as the majority of its historic range in the southeastern United States. Therefore, it is unlikely that the American burying beetle would be impacted directly or indirectly by project activities.

Potential impacts to three additional federally listed terrestrial animal species were assessed based on documented presence within Benton County, Mississippi, or the

potential for the species to occur in the project footprint. The federally endangered Indiana bat is known from Benton County, and the federally threatened northern long-eared bat (NLEB) and wood stork have the potential to occur throughout the state of Mississippi.

Foraging habitat for wood stork may occur in wetlands associated with the Cushtusia Creek and Blinker Creek River systems in the study area. The proposed Action Alternative would remove large trees within the proposed ROW; however, impacts to hydrology of wetlands would be minimized with the use of standard BMPs within these wetland complexes (see Wetlands and mitigation measures sections below). Therefore, any potential direct or indirect impacts of this project to wood stork foraging habitat would be insignificant/minimal.

Suitable foraging habitat for Indiana bat and NLEB exists over ponds, streams and wetlands, as well as along fence rows and forest fragments within the proposed project footprint. Habitat surveys for Indiana bat and NLEB recorded 203 suitable summer roost trees across 32 acres of fragmented forest within the project footprint, some of which falls within Holly Springs National Forest. Suitable foraging habitat for the Indiana bat and NLEB would be removed as part of the proposed action, but this suitable habitat is plentiful in the surrounding landscape. Additionally, BMPs will be utilized in SMZs around all bodies of water within the proposed project boundary, thus minimizing sedimentation and avoiding any changes to hydrology that could impact existing habitat for the Indiana bat and NLEB.

Consultation with the USFWS under Section 7 of the ESA is underway. TVA's consultation with the USFWS would be finalized prior to implementation of the following avoidance measure:

- Any potentially suitable Indiana and NLEB summer roosting habitat would be selectively removed between the dates of October 1 and April 14.

With the implementation of this avoidance measure and the existence of plentiful suitable habitat outside the project area, removal of forest habitat suitable for use by Indiana bat or NLEB for summer roosting may affect, but is not likely to adversely affect the species.

Wetlands

Activities in wetlands are regulated under Section 401 and 404 of the CWA and are addressed by EO 11990 (Protection of Wetlands). Section 401 requires water quality certification by the state for projects permitted by the federal government (Strand 1997). Section 404 implementation requires activities resulting in the discharge of dredge or fill into waters of the U.S. to be authorized through a Nationwide General Permit or Individual Permit issued by the U.S. Army Corps of Engineers (USACE). EO 11990 requires federal agencies to minimize wetland destruction, loss, or degradation, and preserve and enhance natural and beneficial wetland values, while carrying out agency responsibilities.

Wetland field surveys within the proposed TL ROW were conducted on August 18 and 19, 2015. As documented in the attached checklist (Attachment 1), a total of 5.25 acres of wetlands were identified. Of the 5.25 acres of wetland, 3.3 acres are currently low growing scrub-shrub/emergent wetland, which would not require clearing due to the existing low stature of this habitat type. The proposed TL would span these 3.3 acres of wetland and wetland functions would not be altered. Therefore, only the clearing and habitat conversion of 1.95 acres of forested wetlands to scrub-shrub/emergent wetland habitat would be required to accommodate the TL construction. This conversion is subject to the regulation of the USACE Vicksburg District which requires no net loss of wetland function across the

watershed, in accordance with Clean Water Act Section 404/401. TVA has minimized transmission line structure locations in wetlands to the extent practicable. To the extent any stream alterations or wetland impacts cannot be avoided within the project area, a USACE Permit will be obtained and the terms and conditions of this permit, including compensatory mitigation credits if required, will be implemented prior to the start of clearing or construction activities.

In compliance with the CWA, EO11990, TVA has considered all alternatives to avoid and minimize wetland impacts, resulting in the least wetland disturbance practicable. As a result of proposed protective measures (see mitigation measures section below) in place during construction, maintenance, and operation and fulfilling USACE permit requirements, and use of compensatory mitigation credits if necessary, the TL construction project would have no significant adverse direct or indirect impacts to wetland areas or to the associated wetland functions and values provided within the general watershed.

Archaeological and Historic Resources

TVA has defined the Area of Potential Effect (APE) for archaeological resources for the proposed actions as the 100 foot-wide ROW for the proposed 15-mile TL, and the approximate 6 miles of associated off-ROW access roads which encompasses a total of approximately 178 acres. The architectural APE for the project consists of areas within a 0.5 mile radius surrounding the center line of the proposed new 161-kV transmission line. The APE also includes any areas where the project will alter existing topography or vegetation in view of a historic resource.

TVA completed a Phase I cultural resources survey of the APE in order to identify any historic properties that may be impacted by the undertaking. The investigation included an archaeological survey within the archaeological APE and a survey for historic above ground (architectural) resources within the architectural APE. The survey identified two archaeological sites (22BE661 and 22BE662), two isolated finds of archaeological material (IF-1 and IF-2), and two linear archaeological resources (22BE663 and 22BE664). Both linear resources consist of sections of historic roads. IF-1 consisted of a fragment of Bristol glazed stoneware and a brick fragment, both found in a shovel test. IF-2 consisted of a stemmed bifacial tool made of Fort Payne chert found on the ground surface. TVA has determined that the two archaeological sites and two linear resources may have potential to provide data important in history or prehistory. However, given the limited scope of phase I investigations, the eligibility of all four of these resources for inclusion in the National Register of Historic Places (NRHP) is considered “undetermined”. TVA considers the isolated finds to be ineligible for inclusion in the NRHP because they do not meet NRHP criteria of significance.

No architectural resources that are included in or eligible for inclusion in the NRHP were identified in the APE. The historic architectural survey identified 21 previously undocumented architectural resources. TVA has determined that all 21 of these resources are ineligible for inclusion in the NRHP due to a lack of architectural distinction and to loss of historic integrity resulting from modern alterations.

TVA consulted with the Mississippi State Historic Preservation Officer (SHPO) and federally-recognized Indian tribes concerning these findings and determinations, pursuant to 36 CFR § 800.4. The SHPO responded by letter dated May 5, 2016 and stated concurrence with TVA’s NRHP eligibility determinations for the identified archaeological and above-ground resources, provided TVA’s recommended avoidance measures were

implemented (see mitigation measures section below). TVA received no response from any of the consulted tribes. Therefore, TVA finds that the undertaking will have no adverse effects on NRHP-eligible properties in the APE and no significant impacts on historic properties.

Recreation, Parks, and Natural Areas

Approximately 3,000 feet of the proposed TL crosses the Holly Springs National Forest. There would be 2.29 acres of upland forest clearing on USFS property -- less than one percent of the total land within the boundary of the Holly Springs National Forest. While no developed USFS recreation facilities are located near the TL, this section of the forest is available to the public for dispersed recreation activities such as hiking, wildlife observation, and hunting. No other formal outdoor recreation areas are located within or near the pathway of the project. However, some of the other properties crossed by the project receive dispersed outdoor recreation use.

Construction related activities could cause some temporary shifts in any nearby dispersed recreation activity but these temporary impacts would be minor. Because the new TL would be built parallel to an existing TL, there are no new visual impacts and long term impacts on recreation use patterns within and in the immediate vicinity of the TL should be insignificant.

In addition, BMPs will be implemented to minimize or avoid any impacts resulting from the proposed TL construction and operation (see Attachment 1). Therefore, no direct or indirect significant impacts to the Holly Springs National Forest are anticipated.

Cumulative Impacts

The proposed TL would require approximately 178 acres for ROW and associated temporary access roads. Although most existing agricultural operations and recreational activities could continue to occur within the ROW, the land within the ROW would be encumbered and could not be used for other purposes such as residential development, building sites, or for silviculture. Although this cumulative loss of unencumbered acreage is long term, it is minor compared to the amount of unencumbered land within Benton and Marshall Counties. Therefore, no significant cumulative impacts are expected as a result of implementing the proposed action.

Mitigation Measures

The following BMPs and mitigation measures will be applied during the construction, operation, and maintenance of the proposed TL and access roads to reduce the potential for adverse environmental effects.

- TVA will utilize all applicable BMPs, and additional protection measures as identified and defined by Mucy 2012, *A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities (Revised),* and adhere to the following TVA Standards, Specifications and Guides (https://www.tva.com/Energy/Transmission-System/Transmission-System-Projects):
    - Environmental Protection and Best Management Practices for TVA Transmission Construction and Maintenance Activities
    - Environmental Quality Protection Specifications for Transmission Line Construction

- ROW Clearing Specifications
- ROW Vegetation Management Guidelines
- Environmental Quality Protection Specifications for Transmission Substation or Communications Construction

TVA determined that the proposed action would result in the direct impact to 1.95 acres of forested wetlands by reducing wetland functions through the conversion of wetland type. TVA will implement the following mitigation measure to minimize these impacts:

- TVA will comply with the terms and conditions of the USACE permit, including any compensatory mitigation credits if required, prior to the start of clearing and construction

TVA determined that the proposed action would result in the direct loss of 94 acres of potential NLEB and Indiana bat summer roosting tree habitat. TVA will implement the following avoidance measure to minimize these impacts:

- Any potentially suitable Indiana bat and NLEB summer roosting habitat will be selectively removed between the dates of October 1 and April 14.

TVA has received SHPO concurrence that the undertaking will have no effects to any archaeological sites listed or eligible for listing in the NRHP, provided the following avoidance and minimization measures are implemented:

- TVA will minimize ground-disturbing activities within the site boundaries by performing the work when the ground is dry or using low ground pressure equipment or mats. No structures would be placed within the site boundaries.
- TVA will not operate any heavy equipment within the boundaries of the two linear features.
- TVA will mark the sensitive areas with relevant work restrictions on all plans and designs to be used during the undertaking.

Additionally, the following commitments will be implemented prior to the proposed project in order to ensure no significant impact to the *Nondo lovage* or whorled mountain-mint.

- Transmission Projects Environmental Support will contact the TVA botanist before clearing and construction to coordinate avoidance measures and access within the ROW.
- The location of the whorled mountain-mint will be included in TVA's Sensitive Area Review database for future reference during maintenance activities.

Conclusion and Findings

Based on the findings listed above and the analyses in the attached checklist, we conclude that the proposed action to provide power to the new HSUD 161-kV Ashland Substation by constructing, operating, and maintaining approximately 15 miles of new TL would not be a

major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.

6-7-2016

Amy B. Henry, Manager
NEPA Program and Valley Projects
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Date Signed

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Attachment

Categorical Exclusion Checklist for Proposed TVA Actions – Ashland 161-kV Delivery Point

Categorical Exclusion Checklist for Proposed TVA Actions

Categorical Exclusion Number Claimed	Organization ID Number 405784 - WOs 315DT, 315ED, 33CIL, 33CJP, 33CUT, 333QH	**Tracking Number** *(NEPA Administration Use Only)* 34599

Form Preparer	Project Initiator/Manager	Business Unit
Todd C Liskey	Kimberly D Choate	ED - Electric System Projects

Project Title	Hydrologic Unit Code
Ashland 161-kV Delivery Point - Project 405784, WOs 315DT, 315ED, 33CIL, 33CJP, 33CUT, 333QH	

Description of Proposed Action *(Include Anticipated Dates of Implementation)* ☐ Continued on Page 3 *(if more than one line)*

For Proposed Action See Attachments and References

Initiating TVA Facility or Office	TVA Business Units Involved in Project

Location *(City, County, State)*

Marshall and Benton Counties, MS, See project maps.

Parts 1 through 4 verify that there are no extraordinary circumstances associated with this action:

Part 1. Project Characteristics

	Is there evidence that the proposed action...	No	Yes	Commit-ment	Information Source for Insignificance
	1. Is major in scope?	X			Liskey, Todd C. 04/29/2016
	2. Is part of a larger project proposal involving other TVA actions or other federal agencies?	X			Liskey, Todd C. 04/29/2016
*	3. Involves non-routine mitigation to avoid adverse impacts ?	X		No	Liskey, Todd C. 04/29/2016
	4. Is opposed by another federal, state, or local government agency?	X			Liskey, Todd C. 04/29/2016
*	5. Has environmental effects which are controversial?	X			Liskey, Todd C. 04/29/2016
*	6. Is one of many actions that will affect the same resources?	X			Liskey, Todd C. 04/29/2016
	7. Involves more than minor amount of land?		X		For comments see attachments

*If "yes" is marked for any of the above boxes, consult with NEPA Administration on the suitability of this project for a categorical exclusion.

Part 2. Natural and Cultural Features Affected

Would the proposed action...	No	Yes	Permit	Commit-ment	Information Source for Insignificance
1. Potentially affect endangered, threatened, or special status species?		X	No	No	For comments see attachments
2. Potentially affect historic structures, historic sites, Native American religious or cultural properties, or archaeological sites?		X	No	No	For comments see attachments
3. Potentially take prime or unique farmland out of production?	X		No	No	Liskey, Todd C. 05/06/2016
4. Potentially affect Wild and Scenic Rivers or their tributaries?	X		No	No	For comments see attachments
5. Potentially affect a stream on the Nationwide Rivers Inventory?	X		No	No	For comments see attachments
6. Potentially affect wetlands?		X	Yes	No	For comments see attachments
7. Potentially affect water flow, stream banks or stream channels?		X	No	No	For comments see attachments
8. Potentially affect the 100-year floodplain?		X	No	No	For comments see attachments
9. Potentially affect ecologically critical areas, federal, state, or local park lands, national or state forests, wilderness areas, scenic areas, wildlife management areas, recreational areas, greenways, or trails?		X	Yes	No	For comments see attachments
10. Contribute to the spread of exotic or invasive species?		X	No	No	For comments see attachments
11. Potentially affect migratory bird populations?	X		No	No	For comments see attachments
12. Involve water withdrawal of a magnitude that may affect aquatic life or involve interbasin transfer of water?	X		No	No	Liskey, Todd C. 05/06/2016
13. Potentially affect surface water?		X	No	No	For comments see attachments
14. Potentially affect drinking water supply?	X		No	No	Liskey, Todd C. 05/06/2016
15. Potentially affect groundwater?		X	No	No	For comments see attachments
16. Potentially affect unique or important terrestrial habitat?	X		No	No	For comments see attachments
17. Potentially affect unique or important aquatic habitat?	X		No	No	For comments see attachments

Part 3. Potential Pollutant Generation

Would the proposed action potentially (including accidental or unplanned)...	No	Yes	Permit	Commit-ment	Information Source for Insignificance
1. Release air pollutants?	X		No	No	Liskey, Todd C. 05/06/2016
2. Generate water pollutants?		X	No	No	For comments see attachments
3. Generate wastewater streams?	X		No	No	Liskey, Todd C. 05/06/2016
4. Cause soil erosion?		X	Yes	No	For comments see attachments
5. Discharge dredged or fill materials?	X		No	No	Liskey, Todd C. 05/06/2016
6. Generate large amounts of solid waste or waste not ordinarily generated?	X		No	No	For comments see attachments
7. Generate or release hazardous waste (RCRA)?	X		No	No	Liskey, Todd C. 05/06/2016
8. Generate or release universal or special waste, or used oil?	X		No	No	Liskey, Todd C. 05/06/2016
9. Generate or release toxic substances (CERCLA, TSCA)?	X		No	No	Liskey, Todd C. 05/06/2016
10. Involve materials such as PCBs, solvents, asbestos, sandblasting material, mercury, lead, or paints?		X	No	No	For comments see attachments
11. Involve disturbance of pre-existing contamination?	X		No	No	Liskey, Todd C. 05/06/2016
12. Generate noise levels with off-site impacts?	X		No	No	For comments see attachments
13. Generate odor with off-site impacts?	X		No	No	Liskey, Todd C. 05/06/2016
14. Produce light which causes disturbance?	X		No	No	Liskey, Todd C. 05/06/2016
15. Release of radioactive materials?	X		No	No	Liskey, Todd C. 05/06/2016
16. Involve underground or above-ground storage tanks or bulk storage?	X		No	No	Liskey, Todd C. 05/06/2016
17. Involve materials that require special handling?		X	No	No	For comments see attachments

Part 4. Social and Economic Effects

Would the proposed action...	No	Yes	Permit	Commit-ment	Information Source for Insignificance
1.Potentially cause public health effects?	X			No	Pilakowski, Ashley 05/09/2016
2.Increase the potential for accidents affecting the public?	X			No	Liskey, Todd C. 05/06/2016
3.Cause the displacement or relocation of businesses, residences, cemeteries, or farms?	X			No	Liskey, Todd C. 05/06/2016
4.Contrast with existing land use, or potentially affect resources described as unique or significant in a federal, state, or local plan?	X			No	Liskey, Todd C. 05/06/2016
5.Disproportionately affect minority or low-income populations?	X			No	For comments see attachments
6.Involve genetically engineered organisms or materials?	X			No	Liskey, Todd C. 05/06/2016
7.Produce visual contrast or visual discord?	X			No	For comments see attachments
8.Potentially interfere with recreational or educational uses?	X			No	For comments see attachments
9.Potentially interfere with river or other navigation?	X		No	No	Liskey, Todd C. 05/06/2016
10.Potentially generate highway or railroad traffic problems?	X			No	Liskey, Todd C. 05/06/2016

Part 5. Other Environmental Compliance/Reporting Issues

Would the proposed action...	No	Yes	Commit-ment	Information Source for Insignificance
1.Release or otherwise use substances on the Toxic Release Inventory list?	X		No	Liskey, Todd C. 05/06/2016
2.Involve a structure taller than 200 feet above ground level?	X		No	Liskey, Todd C. 05/06/2016
3.Involve site-specific chemical traffic control?	X		No	Liskey, Todd C. 05/06/2016
4.Require a site-specific emergency notification process?	X		No	Liskey, Todd C. 05/06/2016
5.Cause a modification to an existing environmental permit or to existing equipment with an environmental permit or involve the installation of new equipment/systems that will require a permit?	X		No	Liskey, Todd C. 05/06/2016
6.Potentially impact operation of the river system or require special water elevations or flow conditions??	X		No	Liskey, Todd C. 05/06/2016
7.Involve construction or lease of a new building or demolition or renovation of existing building (i.e. major changes to lighting, HVAC, and/or structural elements of building of 1000 sq. ft. or more)?	X		No	Liskey, Todd C. 05/06/2016

Parts 1 through 4: If "yes" is checked, describe in the discussion section following this form why the effect is insignificant. Attach any conditions or commitments which will ensure insignificant impacts. Use of non-routine commitments to avoid significance is an indication that consultation with NEPA Administration is needed.

An ☐ *EA or* ☐ *EIS Will be prepared.*

Based upon my review of environmental impacts, the discussion attached, and/or consultations with NEPA Administration, I have determined that the above action does not have a significant impact on the quality of the human environment and that no extraordinary circumstances exist. Therefore, this proposal qualifies for a categorical exclusion under Section 5.2. _____ *of TVA NEPA Procedures.*

Project Initiator/Manager Kimberly D Choate		Date 05/31/2016
TVA Organization PSO	E-mail kdchoate@tva.gov	Telephone

Environmental Concurrence Reviewer

Todd C. Liskey 05/27/2016

Signature

Preparer Closure

Signature

Other Environmental Concurrence Signatures *(as required by your organization)*

Signature

Signature

Signature *Signature*

Other Review Signatures *(as required by your organization)*

Todd C. Liskey 05/27/2016

Signature *Signature*

Emily P Willard 05/26/2016

Signature *Signature*

Signature *Signature*

Attachments/References

Description of Proposed Action Continued from Page 1
In order to maintain reliable electric service in the Ashland area, Holly Springs Utility Department (HSUD) plans to build a new 161-kV Ashland Substation on the west side of the intersection of Lamar Road and County Church Road approximately 0.5 mile west of Highway 5. TVA proposes to provide power to the substation by building about 15 miles of transmission line to power the substation, beginning at its Holly Springs-Miller 161-kV TL. The new TL would be built beside the existing Holly Springs-Ashland 46-kV line that currently serves the Ashland area, using steel pole structures. The new line would occupy an easement 100 feet wide, consisting of 37.5 feet of existing right-of-way (ROW) and 62.5 feet of new ROW. TVA would also dispose of their metering equipment at the existing 46-kV substation, provide new metering equipment for the LPC to install in the new substation, and replace relays at the Miller and Holly Springs 161-kV substation to accommodate the new TL.

CEC General Comment Listing

1. TPS Environmental Quality Expectations and TPS Environmental Standards and Specifications will apply throughout the life of the project.
   By: Todd C Liskey 04/09/2016
   Files: Ashland_Standard_Commitments.pdf 04/09/2016 254.09 Bytes
2. TPS Environmental Protection Procedures will be used for this project. http://ed.tva.gov/environmental/Environmental%20Protection%20Procedure%20and%20Supporting/Forms/AllItems.aspx
   By: Todd C Liskey 04/09/2016
3. TPS's BMP Manual.
   https://www.tva.com/file_source/TVA/Site%20Content/Energy/Transmission/Transmission-Projects/BMP_Manual_R2.1.pdf
   By: Todd C Liskey 04/09/2016
4. Environmental notes added to plan and profile sheets.
   By: Todd C Liskey 04/09/2016
   Files: Ashland Env Notes_R2.docx 05/12/2016 17.63 Bytes
5. Project maps showing the environmental resources identified along the proposed ROW and temporary access roads.
   By: Todd C Liskey 04/09/2016
   Files: Ashland_Env_VicinityMap_s7-12.pdf 04/09/2016 1,750.20 Bytes
   Ashland_Env_VicinityMap_s1-6.pdf 04/09/2016 1,825.38 Bytes

CEC Comment Listing

Part 1 Comments

7. This project will require the clearing of approximately 94 forested acres.
   By: Todd C Liskey 05/11/2016

Part 2 Comments

1. Contact TVA botanist 865-632-2403 before clearing and construction to coordinate avoidance measures and access in areas where the State-listed plant Canadian licorice-root (Botany 001 on the plan and profile sheets) and the State-listed plant whorled mountain mint (Botany 002 on the plan and profile sheets) occur.
   By: Todd C Liskey 05/06/2016
1. TVA would clear the 32 acres of potential summer roosting habitat for Indiana and northern long-eared bats between October 1-April 14.
   By: Ashley Pilakowski 05/31/2016
   Files: Ashland_TerrZoology_Input.docx 05/31/2016 44.87 Bytes
1. T&E input prepared by Biological and Cultural Compliance for Plants, Terrestrial Zoology, and Aquatics is attached.
   By: Todd C Liskey 05/06/2016
   Files: Ashland_TerrZoology_Input.docx 05/27/2016 44.91 Bytes

	Ashland_Aquatics_Input.docx	05/27/2016	38.98 Bytes
	Ashland_Botany_Input.docx	05/27/2016	33.06 Bytes
2.	Cultural Resources input prepared by Biological and Cultural Compliance is attached.		
	By: Todd C Liskey	05/06/2016	
	Files: Ashland_Cultural Resources_Input.docx	05/27/2016	17.34 Bytes
2.	Impacts to two archaeological sites and two linear resources (total of 3 sites on the plan and profile sheets) would be minimized by spanning the sites with the TL and minimizing ground disturbing activities within the sites by performing the work when the ground is dry or using low ground pressure equipment or mats. SHPO concurrence is attached.		
	By: Todd C Liskey	05/11/2016	
	Files: Ashland MS Draft Rpt MS SHPO response 20160505.pdf	05/11/2016	307.62 Bytes
4.	Natural Areas input prepared by Biological and Cultural Compliance is attached.		
	By: Todd C Liskey	05/27/2016	
	Files: Ashland_NaturalAreas_Input.docx	05/27/2016	21.17 Bytes
5.	See Natural Areas input attached to part 2, question 4 for details.		
	By: Todd C Liskey	05/27/2016	
8.	Floodplains input prepared by Biological and Cultural Compliance is attached.		
	By: Todd C Liskey	05/06/2016	
	Files: Ashland_Floodplains_Input.docx	05/27/2016	22.51 Bytes
8.	To minimize adverse impacts on natural and beneficial floodplain values, the following routine mitigation measures would be implemented: 1) Portions of two proposed temporary access roads are located in the 100-year floodplain. Any improvements to these roads would be done such that upstream flood elevations would not be increased. 2) The ROW would be revegetated where natural vegetation would be removed. 3) BMPs would be used during construction activities. 4) TVA will follow TVA subclass review criteria for TPS line location in floodplains. Project activities will be consistent with Executive Order 11988.		
	By: Todd C Liskey	05/06/2016	
9.	TVA would acquire necessary permission from Holly Springs National Forest to construct and maintain the section of the proposed TL located on forest service property.		
	By: Todd C Liskey	05/11/2016	
9.	A 0.57-mile segment of the middle portion of the proposed TL crosses the Holly Springs National Forest. TVA would contact Buddy Lowrey, blowrey@fs.fed.us, 662-236-6550 ext. 227 and Jim Schiller, jschiller@fs.fed.us, 662-285-3264 ext. 815 prior to work in this area. See Natural Areas input attached to part 2, question 4 for more details.		
	By: Todd C Liskey	05/27/2016	
10.	To minimize the potential introduction and spread of invasive species in the project area, TVA would follow their standard practice of revegetating with noninvasive species, per the BMP manual. See Botany input attached to Part 2, Question 1 for more details.		
	By: Todd C Liskey	05/06/2016	
11.	No aggregations of migratory birds or wading bird colonies have been documented within three miles of the project area and none were observed during field surveys. See Terrestrial Zoology input attached to Part 2, Question 1.		
	By: Todd C Liskey	05/06/2016	
13.	Surface water input prepared by Biological and Cultural Compliance is attached.		
	By: Todd C Liskey	05/06/2016	
	Files: Ashland_SurfaceWater_Input.docx	05/27/2016	24.29 Bytes
13.	Insignificant surface water impacts would result from proper implementation of standard TVA Best Management Practices (Muncy, 2012) and standard commitments to contain/dispose all wastes and to prevent pollution runoff and discharge.		
	By: Todd C Liskey	05/06/2016	
15.	Insignificant groundwater impacts would result from proper implementation of standard Best Management Practices as identified in Muncy (2012), to contain/dispose all wastes and to prevent pollution runoff and discharge.		
	By: Todd C Liskey	05/06/2016	
15.	Groundwater input prepared by Biological and Cultural Compliance is attached.		
	By: Todd C Liskey	05/06/2016	
	Files: Ashland_Groundwater_Input.docx	05/27/2016	17.51 Bytes
16.	See Terrestrial Zoology and Botany input attached to Part 2, Question 1 for details.		
	By: Todd C Liskey	05/06/2016	
17.	See Aquatics input attached to Part 2, Question 1 for details.		
	By: Todd C Liskey	05/06/2016	
6.	The wetlands input prepared by Biological and Cultural Compliance is attached.		
	By: Todd C Liskey	05/06/2016	
	Files: Ashland_Wetlands_Input.docx	05/27/2016	45.26 Bytes
6.	USACE wetland data sheets are attached.		
	By: Todd C Liskey	05/06/2016	
	Files: Ashland_USACE_forms_1.pdf	05/06/2016	2,335.30 Bytes
	Ashland_USACE_forms_2.pdf	05/06/2016	1,510.82 Bytes

6. TVA RAM forms are attached.

By: Todd C Liskey 05/06/2016

Files: Ashland_TVARAM_forms_1.pdf 05/06/2016 1,828.03 Bytes
Ashland_TVARAM_forms_2.pdf 05/06/2016 1,125.33 Bytes

6. Prior to construction start, TVA would obtain a permit from the U.S. Army Corps of Engineers for work in wetland areas. TVA would follow all conditions of the permit, including compensatory mitigation credits if required. Commitment will be defined further in the EA.

By: Todd C Liskey 05/13/2016

6. TVA would implement Best Management Practices for wetlands as defined in “A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Transmission Construction and Maintenance Activities”.

By: Todd C Liskey 05/06/2016

7. Insignificant impacts to riparian zones will result from implementation of Best Management Practices and Streamside Management Zone standards as identified in Muncy (2012), http://chaptpsnet.cha.tva.gov:8001/Environmental/BMP_Menu.asp, at locations identified on the plan and profile sheets. See Aquatics input attached to Part 2, Question 1 for more details.

By: Todd C Liskey 05/06/2016

Part 3 Comments

2. Insignificant impacts would result with proper implementation of standard Best Management Practices as identified in Muncy (2012), and proper containment/treatment/disposal of wastewaters, stormwater runoff, wastes and potential pollutants. See Surface Water input attached to Part 2, Question 13 for more details.

By: Todd C Liskey 05/06/2016

4. Insignificant impacts will result from proper implementation of standard Best Management Practices as identified in Muncy (2012). A state and/or MS4 construction stormwater permit will be required if the disturbance threshold for any applicable permits is exceeded. See Surface Water input attached to Part 2, Question 13 for more details.

By: Todd C Liskey 05/06/2016

6. The retired equipment would be retained for spare inventory or scrapped/recycled, along with any associated non-asbestos wiring, cable/conduit or steel. TVA’s ERAL Procedures for recycling scrap metals would be used for this project. http://chapedmw2.cha.tva.gov/dms/pc/getdocument.asp?library=chaedmp^chachaedmp1&idmId=043270008&save=1
The ERAL vendors can be found here: http://orgs.tva.gov/cfo/sc/mm/InvestRecovery-Distribution/Investment%20Recovery%20%20Distribution/ERAL%20Listing.pdf

By: Todd C Liskey 05/06/2016

10. All lead coated cables would be handled and recycled/disposed per TPS's Environmental Protection procedures - Waste Management Section. http://ed.tva.gov/environmental/Environmental%20Protection%20Procedure%20and%20Supporting/Forms/AllItems.aspx

By: Todd C Liskey 05/06/2016

10. If the retired relays are electromechanical relays, they would be managed according to the “Management of PCBs in Electromechanical Relays” procedure outlined in TPS’s Environmental Protection Procedures -- PCB Management Section.

By: Todd C Liskey 05/06/2016

10. Any asbestos work or disturbance would require certified personnel. Any asbestos waste would be handled, packaged, and disposed of according to TPS’s Environmental Protection Procedures - Asbestos Management Section, and TVA’s Environmental Procedure TVA-SPP-5.67- Asbestos Management. http://ed.tva.gov/environmental/Environmental%20Protection%20Procedure%20and%20Supporting/Forms/AllItems.aspx & http://chapedmw2.cha.tva.gov/dms/pc/getdocument.asp?library=chaedmp^chachaedmp1&idmId=102371530&save=1

By: Todd C Liskey 05/06/2016

12. Noise would be transient during construction.

By: Todd C Liskey 05/06/2016

17. See comments for Part 3, Question 10.

By: Todd C Liskey 05/06/2016

Part 4 Comments

5. Socioeconomics and Environmental Justice input for this project is attached.

By: Todd C Liskey 05/06/2016

Files: Ashland_Soc&EJ_Input.docx 05/27/2016 26.96 Bytes

7. Visual input is attached.

By: Todd C Liskey 05/06/2016

Files: Ashland_Visual_Input.docx 05/27/2016 1,330.78 Bytes

8. Recreation input prepared by Biological and Cultural Compliance is attached.

By: Todd C Liskey 05/11/2016

Files: Ashland_Recreation_Input.docx 05/27/2016 13.57 Bytes

CEC Permit Listing

Part 2 Permits

6. Section 404 Permit (¿404 Clean Water Act)

	By: Todd C Liskey	05/11/2016
9.	Land Use/Special Use Permit	
	By: Ashley Pilakowski	05/18/2016

Part 3 Permits

4.	Stormwater Discharge Permit	
	By: Todd C Liskey	05/06/2016

CEC Commitment Listing