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FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY
PHASE 1 EAST REGION CONSOLIDATION – NORRIS PROPERTIES
SECOND SUPPLEMENTAL
ANDERSON COUNTY, TENNESSEE

In 2013, the Tennessee Valley Authority (TVA) developed an internal valley wide real estate strategy to effectively and efficiently manage the agency-wide real estate portfolio to reduce costs and maximize the financial return on TVA's real estate assets¹ including office space. To meet office space requirements and consolidate the operations in a more efficient and economical manner, TVA is proposing to relocate the Central Laboratories and Services program (formerly known as the Inspection, Testing, Monitoring, and Analysis [ITMA] program) from the Summer Place Building in Knoxville, TN, aquatic laboratory (lab) from TVA's Walnut Orchard facility in Norris, TN, water quality lab from the TVA's Greenway Area Office building (Greenway) in Knoxville, and associated equipment storage needs to the Norris Engineering Lab Complex (Engineering Lab). The consolidation effort would require interior and exterior renovations to some of the buildings and infrastructure at the Engineering Lab. The consolidation effort would relocate up to 40 TVA staff to the Engineering Lab.

The project is divided into two phases. Phase 1 would be focused on interior renovations of certain structures at the Engineering Lab, and exterior work focused primarily in the southern and eastern portions of the property. Phase 1 exterior actions include the demolition of two small boat sheds and Building I, clearing of trees, installation of lights and cameras for security on the exterior of certain structures, construction of a stormwater detention pond, trenching and groundwork in the vicinity of Buildings B and I, repaving/reconfiguring of parking areas, and construction of a new boat shed(s) in the vicinity of Building I. Phase 1 also includes soil transport activities, also occurring in two separate actions. The first soil action involved the removal of up to 750 cubic yards of soil from the Engineering Labs to an existing offsite landfill and up to 2,000 cubic yards of material to the Walnut Orchard site to fill the former basement of a demolished structure. The second Phase 1 soil action was evaluated in the *Phase 1 East Region Consolidation – Norris Properties Second Environmental Assessment* (Phase 1 Second SEA) which evaluates the transport of up to 37,000 cubic yards of soil from the Engineering Labs to either Walnut Orchard for leveling the site, or to an existing, offsite landfill.

Phase 2 is driven by security updates needed to bring the facility into compliance with current TVA security measures and protocols. Phase 2 would also address additional consolidation related actions that may be necessary as a result of TVA's ongoing evaluation of the condition of the existing facilities and program needs; this includes renovations to various buildings onsite that were

¹ Title to real property held by TVA is in the name of the United States of America.

unknown at the time of the Phase 1 evaluation that may be necessary as a result of TVA's ongoing evaluation of the condition of the existing facilities and program needs. The Phase 2 actions will be evaluated separately.

Alternatives

In accordance with the National Environmental Policy Act (NEPA), TVA developed and evaluated three feasible alternatives in the Phase 1 Second SEA: Alternative A - the No Action Alternative, Alternative B – Soil deposition at Walnut Orchard and an existing offsite landfill and construction of a stormwater chamber, and Alternative C – soil deposition at an existing offsite landfill and construction of a stormwater chamber.

Under Alternative A, the No Action Alternative, TVA would not relocate and dispose of additional soil from the Engineering Labs and would not construct a stormwater chamber. Phase 1 construction previously considered and evaluated could still proceed. Because the removal of the soil from the Engineering Labs affects TVA's ability to complete the planned Phase 1 construction, this alternative would not meet the project's purpose and need, however it does provide a baseline comparison for the proposed action alternatives.

Under Alternative B – Soil deposition at Walnut Orchard and an existing offsite landfill and construction of a stormwater chamber, TVA would complete the following actions:

- Transport soil that is not suitable for use as stable fill material from the Phase 1 project area at the Engineering Labs to the Walnut Orchard property and one of three existing offsite landfills (Chestnut Ridge Landfill, Riverside C&D Landfill, and/or Poplar View Landfill) located within 30 miles of the Engineering Lab facility.
- Transport soil that is suitable for use as stable fill material (clay or rock) to the Engineering Lab from an existing, licensed, and qualified (Section 106 compliant) source location or from TVA's Walnut Orchard site.
- Total soil moved to and/or from the Engineering Lab would be a maximum of approximately 37,000 cubic yards.
- Deposition of soil at Walnut Orchard would also entail vegetation clearing, construction of a temporary access road in the deposition area, temporary modifications and later repairs to the existing fence to accommodate the dump trucks and associated vehicles, repairs to the existing, paved Walnut Orchard access road, and landscaping/reseeding of vegetation atop the deposited soil. Possible additional topsoil may need to be transported to Walnut Orchard at completion of deposition activities, the topsoil would come from a stockpile or an existing, licensed, and qualified (Section 106 compliant) location and would be included within the maximum of 37,000 cubic yards of material transported.
- Construction of an in-ground stormwater chamber in lieu of the stormwater pond evaluated in the Phase 1 Environmental Assessment and construction of a parking area atop the stormwater chamber.

Alternative C – Soil deposition at an existing offsite landfill and construction of a stormwater chamber would include all of the actions described under Alternative B with the exception that no soil would be deposited at Walnut Orchard.

Alternatives Considered and Eliminated

In addition to the alternatives described above, TVA considered two additional alternatives for the reuse of the soils from the Engineering Labs.

Alternative D – Bull Run TVA considered reusing the soil from the Engineering Labs as cover soil for the proposed Bull Run Fossil Plant ash impoundment closure project. If necessary, Engineering Lab soil would have been staged in a laydown area at Bull Run prior to final placement on the former impoundment. TVA eliminated this alternative from consideration because TVA's ongoing and proposed activities at Bull Run could result in increased vehicle traffic and TVA wants to avoid potential cumulative effects to transportation in the vicinity, and because of the ongoing monitoring activities at Bull Run.

Alternative E – Nearby Properties TVA evaluated transporting the soil from the Engineering Labs to fill in or level out areas at one of three nearby private properties: Covenant Life Church in Clinton, Tennessee; RTE Machine and Fabrication in Norris, Tennessee; and/or Perfect Polish Concrete in Norris Tennessee. All of these offsite private locations were eliminated from consideration for the following reasons:

- Potential need for archaeological, biological, and ecological surveys and soil sampling could adversely affect the private property owners and the need for additional environmental analysis and permitting could also potentially impact the project schedule.
- Involving the private properties would impact the property owner's ability to take specific actions on their property during the time TVA was conducting the assessment.
- Cost and time for landowners to determine how much soil they could accept, where the soil would be placed, and final site disposition have the potential to impact the project schedule.
- Potential long-term risk/legal liability risk to TVA associated with donated soil.
- Certain permitting and planning steps would take longer due to the deposition of soil on a private property.

For these reasons, deposition of the soil from the Engineering Labs at an offsite private property was eliminated from consideration.

Impact Assessment

After analysis, TVA determined that the following resources would not be affected by the proposed action floodplains, wetlands, aquatic ecology, prime farmland, and recreation beyond those effects evaluated in the Revised Phase 1 EA (March 2019). Additionally, TVA determined there would be no new impacts to land use, wildlife, vegetation, threatened and endangered species, historic and archaeological resources, socioeconomics, and environmental justice as evaluated in the Revised Phase 1 EA and Phase 1 Second Supplemental EA.

TVA determined there would be minor and temporary adverse impacts associated with surface water, aesthetics, transportation, air quality, noise, and solid and hazardous waste associated with the soil transport activities. These impacts would be associated with the potential for soil runoff, visual changes, presence of construction equipment, increased traffic flow, mobilization of dust,

generation of noise and vibration, and increased waste disposal. The nature of the construction activities and use of best management practices would minimize these impacts.

Mitigation

TVA will continue to employ all measures described in the Revised Phase 1 EA (March 2019) and Phase 1 First Supplemental EA to mitigate the adverse impacts that may occur in association with the actions described in those evaluations.

To minimize or reduce the environmental effects of the project evaluated in the Phase 1 Second Supplemental EA, TVA would utilize standard operating procedures, best management practices, and mitigation measures. TVA could specifically employ the following mitigation measures:

- To minimize potential impacts to threatened and endangered bat species, tree removal would likely occur between November 15 and March 31 and TVA would implement the identified conservation measures identified in the bat strategy form in Appendix A of the Phase 1 Second Supplemental EA.
- To minimize potential impacts to undiscovered archaeological resources at borrow locations, before authorizing the use of any soil borrow in connection with the proposed action, TVA would satisfy all requirements of Section 106 of the National Historic Preservation Act with regard to that borrow site.
- To minimize potential impacts to transportation resources, TVA could travel the transportation route with a representative of the City prior to construction to identify areas of concern that may have occurred between the date of the field investigation and the commencement of the hauling operations.
- TVA would designate a point of contact to address any issues that may develop during the hauling and construction operations.
- Once soil transport activities begin, if it is determined that the noise and vibration from truck traffic are a nuisance to the surrounding community or congestion is an issue for drivers during peak traffic hours, TVA could work with the City to adjust the times of hauling operations to avoid additional disturbances.
- To mitigate potential impacts to transportation resources, TVA could compensate the City as necessary, to prevent certain damages and to repair damages to infrastructure, if any, that would directly result or are directly resulting from TVA's activities associated with the transportation of the Engineering Lab and Walnut Orchard soil activities. Compensation associated with repairs following the completion of soil transport and construction activities is limited to repairs needed to bring the infrastructure back to existing conditions, after impacts resulting from TVA activities. [Alternatively with appropriate approvals, TVA could assume responsibility for the repairs.](#)
- To minimize the potential for impacts to utilities, TVA could place steel plates or other mitigation measures on the roads or could coordinate with the utility providers as needed to identify areas where the utilities may wish to place steel plates to minimize the potential for impacts.
- TVA could monitor the potential for vibrations created by any soil compaction activities. Should vibrations be identified from the soil compaction activities which result in damage to

buildings or property in the vicinity, TVA would stop compacting activities until appropriate mitigation measures are identified. Mitigation could include modifying compaction methods, installation of vibration monitors, taking photography and maintaining documentation of existing damages to structures, if any, monitoring of changes in structures, if any, and/or the potential to provide compensation, as appropriate, should it be determined that structural damage, if any, was a direct result of the vibrations associated with TVA's activities.

Conclusion and Findings

Based on the findings of the Phase 1 Second Supplemental EA, which are incorporated by reference, TVA concludes that either Alternative B – Soil deposition at Walnut Orchard and an existing offsite landfill and construction of a stormwater chamber, and Alternative C – Soil deposition at an existing offsite landfill and construction of a stormwater chamber would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required. TVA's preferred approach is Alternative B – Soil deposition at Walnut Orchard and an existing offsite landfill and construction of a stormwater chamber.



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Date Signed