

FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY
PRODUCT DEVELOPMENT GRANT PROPOSAL FOR
PROPOSED I-65 COMMERCE PARK EXPANSION

An integral part of Tennessee Valley Authority's (TVA) mission is to promote economic development within the TVA service area. TVA provides financial assistance to help bring to market new improved sites and facilities within the TVA service area and position communities to compete successfully for new jobs. TVA proposes to provide an economic development grant through TVA Product Development funds to the Lewisburg Industrial Development Board, Tennessee, to facilitate expansion of the I-65 Commerce Park. TVA funds would be used for due diligence studies, installation of a kiosk sign, installation of a new access road, installation of a new utility line within the new access road right-of-way, and resurfacing of an existing paved road (Veterans Drive). The I-65 Commerce Park is located north of Highway 373 (Mooreville Highway) near Lewisburg, Marshall County, Tennessee. The area of TVA's Proposed Action (herein referred to as the Direct Impact Area) is comprised of the approximately 2.0-acre area covering the area of the proposed new access road, new utility line, and new kiosk sign, and the 1.9-acre area encompassing the existing paved road (Veterans Drive) that would be resurfaced. The area of potential indirect impact for TVA's Proposed Action (herein referred to as the Indirect Impact Area) is comprised of an approximately 27-acre parcel of land that would be the location of the potential expansion of the I-65 Commerce Park. The area of potential cumulative impact for TVA's Proposed Action (herein referred to as the Cumulative Impact Area) is comprised of an approximately 131-acre parcel of land that is available nearby for future industrial development.

TVA's Proposed Action would facilitate the marketability of a potential 27-acre expansion of the I-65 Commerce Park. The land for this potential future expansion (Indirect Impact Area) would be acquired by the Lewisburg Industrial Development Board using non-TVA funds.

The proposal is the subject of an Environmental Assessment (EA) prepared by TVA, which is incorporated herein by reference. In the EA, TVA evaluated potential impacts of the Proposed Action (i.e., the Action Alternative) as well as the alternative of not implementing the action (i.e., the No Action Alternative). Under the No Action Alternative, TVA would not provide TVA Product Development funds to the Lewisburg Industrial Development Board. TVA would not be furthering its mission of promoting economic development by assisting the local community to compete successfully for new jobs through the Proposed Action. The Lewisburg Industrial Development Board may seek alternate funding (if available) to complete the due diligence studies, install a kiosk sign, install a new access road, install a new utility line within the new access road right-of-way, and resurface Veterans Drive. Success in obtaining alternate funding would result in similar impacts and benefits as the Action Alternative. If the Lewisburg Industrial Development Board were not able to secure the funding for the actions described above, the land use at the site would likely remain unchanged, no direct environmental impacts would be anticipated, and the economic benefits associated with the Action Alternative would not be realized. Under the Action Alternative, TVA would provide TVA Product Development funds to

the Lewisburg Industrial Development Board to complete site/environmental due diligence, installation of a kiosk sign, installation of a new access road, installation of a new utility line within the new access road right-of-way, and resurfacing of Veterans Drive.

The Action Alternative would require disturbance of approximately 2.0 acres during installation of the kiosk sign, new access road, and new utility line within the new access road right-of-way. The installation of these Project components would result in clearing of approximately 0.55 acres of early successional, deciduous forest. The Lewisburg Industrial Development Board or its contractors would implement appropriate measures, such as best management practices (BMPs) and best construction practices, to minimize or reduce negative potential environmental impacts of the Action Alternative to insignificant levels. These practices include, but are not limited to, installation of sediment and erosion controls (silt fences, sediment traps, etc.); management of fugitive dust; and a restriction allowing work during day time work hours only.

TVA has determined that the Proposed Action, subsequent to TVA's selection of the Action Alternative, would have no impact on natural and managed areas, public recreation opportunities, Nationwide Rivers Inventory streams, or Wild and Scenic Rivers. The Proposed Action would not result in impacts from the creation of solid and hazardous wastes.

Implementing the Action Alternative would result in minor impacts to air quality and climate change, water resources and water quality, biological resources (vegetation, wetlands, floodplains, wildlife, aquatic ecology, threatened and endangered species), land use and prime farmland, and archaeological and historical resources. Implementation of the Action Alternative could create potential impacts to the human environment, including the following impacts: visual, noise, socioeconomics and environmental justice, transportation, and safety.

A December 2018 and February 2019 environmental survey identified no wetlands and two waterbodies within the Direct Impact Area including one perennial stream and one wet weather conveyance or ephemeral stream. Waterbodies were examined to determine if they were Jurisdictional Waters of the United States (WOTUS) and Jurisdictional Waters of the State of Tennessee (WOST). The perennial stream was considered a relatively permanent water and would be Jurisdictional WOTUS and WOST. The wet weather conveyance or ephemeral stream was considered a non-relatively permanent water, but has a direct connection to a relatively permanent water and would be potentially a WOTUS. The ephemeral waterbody was also classified as a wet weather conveyance and would not be a Jurisdictional WOST. Because impacts to waterbodies cannot be avoided, consultation and permitting with the USACE Nashville District and TDEC would be required prior to initiation of construction. Impacts to WOTUS would require a Section 404 and 401 Clean Water Act authorization. Impacts to WOST would require an Aquatic Resource Alteration Permit (ARAP) from the TDEC, which would also serve as the Section 401 Water Quality Certification.

Water resources identified within the Indirect Impact Area include one perennial stream, one wet weather conveyance or ephemeral stream, and one pond that is an impoundment of the perennial stream. If future development of the Indirect Impact Area cannot avoid impact to these water resources, consultation and permitting with the USACE Nashville District and TDEC would be required prior to initiation of construction. Impacts to WOTUS would require a Section 404 permit and a Section 401 Clean Water Act certification. Impacts to WOST would require an ARAP from the TDEC, which would also serve as the Section 401 Water Quality Certification.

A review of floodplains revealed that although there are no identified floodplains within the Direct Impact Area, a portion of the existing road (Veterans Drive) that would be resurfaced

crosses East Fork Globe Creek, and therefore its floodplain. A portion of the proposed access road and utility line extension would cross the floodplain of an unnamed tributary of East Fork Globe Creek. Consistent with Executive Order (EO) 11988, Floodplain Management, utility lines and access roads are considered to be repetitive actions in the 100-year floodplain that should result in minor impacts. To minimize adverse impacts, any road construction within the floodplain of East Fork Globe Creek or the unnamed tributary of East Fork Globe Creek would be done in such a manner that upstream flood elevations would not be increased by more than 1.0 foot, and comply with Lewisburg Industrial Development Board or Marshall County, Tennessee, floodplain regulations.

The December 2018 and February 2019 environmental survey did not identify occurrences of or suitable habitat for federally or state-listed plant and aquatic species. The survey did not identify potential roost trees for the federally listed Indiana bat and northern long-eared bat; however trees proposed for removal and aquatic resources to be impacted within the Direct Impact Area do provide suitable foraging habitat for Indiana bat and northern long-eared bat, as well as gray bat. A bridge on Veterans Drive is proposed for resurfacing. Survey of a bridge on Veterans Drive on April 11, 2019 did not identify any bats or evidence of bats using this bridge.

Suitable summer roosting habitat and foraging habitat for Indiana and northern long-eared bat was identified within the Indirect Impact Area. If future development of the Indirect Impact Area cannot avoid removal of potential roost trees, consultation with the USFWS would be required prior to initiation of construction.

A December 2018 and February 2019 Phase I cultural resources investigation identified no new or previously recorded archaeological sites within the Direct Impact Area. No historic properties were I National Register of Historic Places (NRHP) eligible historic property, is located within the viewshed developed for the Area of Potential Effect (APE). Although this property is within the viewshed developed for the APE, the viewshed is severely limited by existing industrial buildings such that the Proposed Action would have No Effect on the property.

The Phase I cultural resources investigation identified two new archaeological sites that lie completely within the Indirect Impact Area and one new archaeological site that lies partially within and partially outside of the Indirect Impact Area. Two of the three sites were not recommended as eligible to the NHRP, and no additional work was recommended. One of the sites was believed to have the potential to be eligible for the NRHP and additional Phase II evaluation was completed. The Phase II found that the site was eligible for listing on the NRHP, but the portion of the site contained within the Indirect APE had been researched to its maximum potential as a result of the Phase II investigations. In a letters dated on July 3rd and September 17th, 2019 the Tennessee SHPO concurred with TVA's findings and recommendations. Accordingly, TVA determined that no archaeological sites or historic properties would be directly affected by the Action Alternative and one archaeological site would not be adversely affected within the Indirect Impact Area.

Resources that could be cumulatively impacted by the Proposed Action and the future I-65 Commerce Park expansion are: air quality and climate change, water resources and water quality, biological resources (vegetation, wetlands, floodplains, wildlife, aquatic ecology, threatened and endangered species), land use and prime farmland, archaeological and historic resources, visual resources, noise, socioeconomic conditions and environmental justice, transportation, and safety. With implementation of appropriate measures, such as BMPs and best construction practices, and consultation and permitting with the appropriate state and federal agencies, cumulative impacts to these resources are anticipated to be minor. Although

it would have a somewhat greater impact than the No Action Alternative, the Action Alternative would result in a minimal impact on the environment. Therefore, TVA has determined that cumulative impacts of the Action Alternative would be insignificant.

Mitigation

To minimize or reduce the environmental effects of site activities associated with the Proposed Action, the Lewisburg Industrial Development Board or its contractors would ensure all clearing and grading activities conducted are in compliance with storm water permitting requirements and would utilize applicable BMPs to minimize and control erosion and fugitive dust during these actions.

Operations involving chemical or fuel storage or resupply and vehicle servicing would be handled outside of riparian areas and in such a manner as to prevent these items from reaching a watercourse. Earthen berms or other effective means would be installed to protect stream channels from direct surface runoff. Servicing of equipment and vehicles would be done with care to avoid leakage, spillage, and subsequent surface or ground water contamination. Oil waste, filters, and other litter would be collected and disposed of properly.

The access road and utility line owner should review - prior to construction - any future driveways, facilities, parking lots and/or roadways connecting to the access road to ensure that the owner is not supporting flood-damageable development within the 100-year floodplain. The access road and utility line owner would contact the local floodplain official(s) to ensure any development within the floodplain connecting to the access road would comply with local floodplain ordinances.

Specific avoidance and conservation measures identified on Page 5 of the TVA Bat Strategy Project Screening Form would be implemented as a part of the Proposed Action to reduce effects to Indiana bat, northern long-eared bat, and gray bat.

Conclusion and Findings

Based on the findings listed above and the analyses in the EA, we conclude that the Proposed Action of TVA funding due diligence studies, installation of a kiosk sign, installation of a new access road, installation of a new utility line within the new access road right-of-way, and resurfacing of an existing paved road (Veterans Drive), would not be a major federal action significantly affecting the environment. This finding is dependent on implementation of the mitigation measures described above. Accordingly, an environmental impact statement is not required.



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11/7/2019

Date Signed