

FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY
INVESTPREP™ GRANT PROPOSAL FOR
OAKLAND PARKWAY SITE

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 InvestPrep™ funds to the Maury County Chamber and Economic Alliance to utilize \$500,000 of TVA InvestPrep™ funding matched with \$1,693,000 of non-TVA funding to assist with the purchase of the Oakland Parkway Site. There will be no direct impacts as a result of the Proposed Action. The entirety of the 129-acre Project Area could experience future industrial development following implementation of the Proposed Action. The area of potential cumulative impact for TVA's Proposed Action is comprised of the 129-acre parcel and two adjacent properties that are available nearby for further industrial development.

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 InvestPrep™ funds to the Maury County Chamber and Economic Alliance. 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 Maury County Chamber and Economic Alliance may seek alternate funding (if available) to combine with their existing funds to purchase the site. Success in obtaining alternate funding would result in similar impacts and benefits as the Action Alternative. If the Maury County Chamber and Economic Alliance were not able to secure the funding for the actions described above, the land use at the site would likely remain unchanged, no 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 InvestPrep™ funds to the Maury County Chamber and Economic Alliance, facilitating the purchase of the Oakland Parkway Site.

Following implementation of the Action Alternative could require disturbance of the Project Area in preparation for industrial use. The Maury County Chamber and Economic Alliance or its contractors are expected to 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 daytime 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, 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 indirect impacts to public recreation opportunities, 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 indirect impacts to the human environment, including the following impacts: visual, noise, socioeconomics and environmental justice, transportation, and safety.

An April 2019 environmental survey identified one forested wetland and two waterbodies within the Project Area including one perennial stream and one wet weather conveyance. The wetland and 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 (SMY001) was considered a relatively permanent water and would be Jurisdictional WOTUS and WOST. The wet weather conveyance (WWCMY001) has a direct connection to a relatively permanent water and would potentially be classified as an ephemeral stream, and a non-relatively permanent water, by the USACE and therefore a WOTUS. WWCMY001 would not be a jurisdictional WOST. The forested wetland is immediately adjacent to the perennial waterbody and would be considered a WOTUS. If impacts to the wetland and 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 CWA Section 404 permit and CWA Section 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.

A review of floodplains revealed that there are identified floodplains within the Project Area associated with Greenlick Creek and East Fork Greenlick Creek (SMY001). Consistent with Executive Order (EO) 11988, if encroachments were proposed, the Maury County Chamber and Economic Alliance would be required to obtain applicable permits and authorizations from the Maury County Building and Zoning Office, which oversees the National Flood Insurance Program.

The April 2019 environmental surveys identified potential roost trees for federally and state listed bats. The perennial stream identified on the Project Area was also identified as potential habitat for federally or state-listed aquatic species and adjacent area for plants. If future development includes removal of potential roost trees or work within or adjacent to the perennial stream, these action are expected to be conducted in consultation with the USFWS and TWRA to determine if mitigation measures are necessary to protect species under the Endangered Species Act or state rules and regulations.

Phase I cultural resources investigations were performed in December 2018, January 2019 and March 2019, identifying one newly recorded archeological site and five standing structures. The archaeological site was not recommended as eligible for listing on the National Register of Historic Places (NRHP) due to its lack of integrity. The architectural survey identified the five newly recorded structures of over 50 years in age and four previously surveyed structures. Of the four previously surveyed structures, two are recommended as ineligible for listed to the NRHP and two were recommend as eligible but with no adverse effect due to limited visible and existing intrusions from an extant industrial building. The five new surveyed structures were recommended as ineligible for the NRHP due to loss of integrity, setting, or overall quality.

Resources that could be cumulatively impacted by the Proposed Action and the future Oakland Parkway Site expansion are: public recreation opportunities, 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 Maury County Chamber and Economic Alliance 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.

If future activities are proposed in the flood zones, compliance with the rules and regulations of the Maury County Building and Zoning Office which oversees the National Flood Insurance Program would be required. If encroachments were proposed, the Maury County Chamber and Economic Alliance would be required to obtain applicable permits and authorizations.

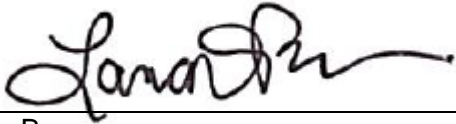
If future development cannot avoid impact to the wetland, perennial stream (East Fork Greenlick Creek), and ephemeral / wet weather conveyance complex, consultation and permitting with the USACE Nashville District and TDEC would be required prior to initiation of construction. Impacts would require a CWA Section 404 permit and a CWA Section 401 authorization, which would include mitigation measures and possibly compensatory mitigation (e.g., purchase of mitigation credits or implementation of a permittee responsible mitigation plan).

Similarly, if impacts are proposed to the wetland, perennial stream (East Fork Greenlick Creek), and ephemeral / wet weather conveyance complex, these actions are expected to be conducted in consultation with the USFWS and TWRA to determine if mitigation measures are necessary to protect species under the Endangered Species Act or state rules and regulations. It is assumed the Maury County Chamber and Economic Alliance would institute the mitigation measures recommended by the agencies.

If the potential increase in traffic generated by future expansion would result in greater than 50 new peak hour trips and 250 new daily trips, consultation with the TDOT would be required during the design of these expansions.

Conclusion and Findings

Based on the findings listed above and the analyses in the EA, we conclude that the Proposed Action of TVA funding the purchase of the Oakland Parkway Site 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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Date Signed