

FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY
ECONOMIC DEVELOPMENT GRANT PROPOSAL FOR
CLARKSVILLE-MONTGOMERY COUNTY CORPORATE BUSINESS PARK SOUTH
Montgomery County, Tennessee (Clarksville)

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 and capital investment. TVA proposes to provide an economic development grant through InvestPrep funds to the Clarksville-Montgomery County Industrial Development Board (CMCIDB) to assist with the development of the Clarksville-Montgomery County Corporate Business Park (CMCCBP) South Lots 19B and B4 (Proposed Action or Project). The area of TVA's proposed action (herein referred to as the Project Area) comprises approximately 81.6 acres and is located just east of Clarksville, Tennessee (TN), at the southwest corner of the Dunlop Lane and Rollow Lane intersection in Montgomery County, TN. There would be minor impacts as a result of the Proposed Action.

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 InvestPrep funds to the CMCIDB. TVA would not be furthering its mission of promoting economic development by assisting the local community to compete successfully for new jobs and capital investment through the Proposed Action. The CMCIDB may seek alternate funding to combine with their existing funds to develop the site. Success in obtaining alternate funding would result in similar impacts and benefits as the Action Alternative. If the CMCIDB were not able to secure the funding for the proposed actions, 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 InvestPrep funds to the CMCIDB to assist with tree clearing, grading of a 200,396 square feet (at minimum) compacted dirt building pad, and construction of a gravel access road. Depending on the final design, the compacted dirt building pad could be up to 747,596 square feet. The Action Alternative would require disturbance of approximately 81.6 acres and would result in clearing of approximately 9.0 acres of trees.

Implementation of the Action Alternative would result in disturbance of the entire 81.6-acre Project Area in preparation for industrial use. The CMCIDB, or its contractors, are expected to implement appropriate measures, such as best management practices (BMPs), 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. They are also expected to obtain all required permits and follow all permit conditions.

TVA's preferred alternative is the Action Alternative. This alternative would meet the purpose of the Project and would further promote TVA's mission to promote economic development in the TVA service area.

The potential impacts of the Action Alternative are described in detail in the EA. Implementation of the Action Alternative would have no impacts on solid and hazardous wastes, floodplains, land use and prime farmland, aquatic ecology, managed and natural areas, or recreation. Minor adverse impacts related to groundwater, soils, and botany would occur due to the site grading and construction.

Under the Action Alternative, wetlands would be impacted at two locations within the Project Area. These would include 0.9 acre of forested wetlands along Rollow Lane and 1.0 acre of emergent wetlands along Dunlop Lane. Mitigation of the 1.9 acres of impacted wetlands would be through the purchase of wetlands credits. One watercourse, a wet weather conveyance, is located within the Project Area. This wet weather conveyance is considered to be potentially non-jurisdictional as it does not appear to have a significant nexus to downstream waters.

An environmental survey of the Project Area was conducted on November 14, 2022. An inactive raptor nest was observed in the crown of a large red-oak tree in a wooded patch along the southern boundary of the Project Area. Tree removal is proposed for November 2023 when the nest should not be active and impacts to nesting raptor and migratory bird species would be avoided. Impacts to wildlife would be insignificant.

The environmental survey identified approximately 3.2 acres of summer roosting habitat (trees) for Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), and tricolored bat (*Perimyotis subflavus*). No winter bat habitat was observed within the Project Area. As part of the actions under the Action Alternative, the 3.2 acres of suitable summer roost habitat is proposed for removal as part of the grading actions. A number of activities associated with the Action Alternative, including tree removal and burning, were addressed in TVA's programmatic consultation with the United States Fish and Wildlife Service (USFWS) on routine actions and federally listed bats in accordance with Endangered Species Act (ESA) Section 7(a)(2) originally completed in April 2018 and updated in April 2023. For those activities with potential to affect bats, TVA committed to implementing specific conservation measures. These activities and associated conservation measures are identified on page five of the TVA Bat Strategy Project Screening Form (Attachment 2 of EA) and must be reviewed/implemented as part of the Action Alternative. With implementation of these conservation measures, no significant impacts are expected to the Indiana or northern long-eared bats. In addition, the Action Alternative would not jeopardize the continued existence of tricolored bat.

A Phase I cultural resources survey, which consisted of an archaeological survey and a historic architectural study, was conducted in January 2023 that covered the Project Area and surroundings. The archaeological survey identified one isolated find that is not eligible for listing in the National Register of Historic Places (NRHP). No further archaeological work was recommended in the Project Area. The historic architectural survey identified five properties that are 50-years or older within the Area of Potential Effect for the Project, which included the immediate 81.6-acre Project Area and an unobstructed 0.5-mile viewshed. None of the properties were considered eligible for listing in the NRHP. TVA consulted with the Tennessee State Historic Preservation Office (SHPO) in a letter dated March 13, 2023 regarding TVA's findings and recommendations. In a letter dated March 13, 2023 the Tennessee SHPO concurred with TVA's findings of no effect. Pursuant to 36 Code of Federal Regulations 800.3(f)(2), TVA also consulted with federally recognized Indian tribes regarding properties that

may have religious and cultural significance to their tribe and be eligible for the NRHP and no responses were received.

Construction vehicles and equipment visible during construction activities would have a low visual impact over the temporary construction period. Therefore, implementation of the proposed Action Alternative would result in a low impact to visual quality.

Noise would be localized and temporary, and no receptor would be exposed to significant noise levels for an extended period. Further, construction activities would be expected to be conducted during daylight hours only, when ambient noise levels are often higher, and most individuals are less sensitive to noise. Thus, noise-related impacts resulting from implementation of the Action Alternative are anticipated to be temporary and minor.

Minor beneficial socioeconomic impacts during construction would occur through increases in construction wages and equipment purchases/rentals. No disproportionate impacts to low-income or minority communities in the area are anticipated as a result of the Action Alternative.

Additional traffic would be generated during construction activities. However, the amount of additional traffic generated would be minor and have a negligible impact on overall traffic volumes.

Construction-related activities would result in minor and short-term impacts to air quality and climate change. With the use of BMPs, impacts would be minimal, temporary, and localized; and would not be anticipated to result in any violation of applicable ambient air quality standards or impact regional air quality.

Mitigation

To minimize or reduce the environmental effects of site activities associated with the Action Alternative, the CMCIDB, or its contractors, are expected to ensure all clearing and grading activities conducted are in compliance with stormwater permitting requirements and utilize applicable BMPs to minimize and control erosion and fugitive dust during these actions. These actions 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.

Onsite burning activities would be conducted in compliance with local burn permits, the requirements in Tennessee APC Rule Chapter 1200-03-09, and conservation measures identified on page 5 of the TVA Bat Strategy Project Screening Form (see Attachment 2 of EA).

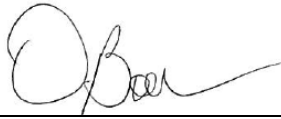
Operations involving chemical or fuel storage or resupply and vehicle servicing are expected to be handled outside of riparian areas and in such a manner as to prevent these items from reaching a watercourse. Earthen berms or other effective means are expected to be installed to protect nearby surface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

Mitigation of the 1.9 acres of impacted wetlands would be completed through the purchase of wetland credits.

Specific avoidance and conservation measures would be implemented as a part of the Action Alternative to reduce effects to the Indiana bat, northern long-eared bat, and tricolored bat. These measures are identified in the TVA Bat Strategy Project Screening Form (see Attachment 2 of EA).

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 improvement of the Project Area within the Clarksville-Montgomery County Corporate Business Park 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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04/28/2023

Date Signed