

FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY
ECONOMIC DEVELOPMENT GRANT PROPOSAL FOR THE
DEVELOPMENT OF THE NORTHWEST TN REGIONAL INDUSTRIAL CENTER
OBION COUNTY, TENNESSEE (UNION CITY)
EAXX-455-00-000-1737714560

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 or 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 Union City, Tennessee (Union City), in partnership with the Obion County Joint Economic Development Corporation (OCJEDC), to assist with the development of a portion of the Northwest TN Regional Industrial Center (NTNRIC) in Obion County, Tennessee. The area of TVA's Proposed Action (herein referred to as the Project Area) encompasses 70 acres, consisting mainly of agricultural land with some forested areas located adjacent to Highway 21, in Union City, Tennessee.

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 Union City. 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. Union City may seek alternate funding (if available) 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. In the event the Project was postponed, any effects would be delayed for the duration of the postponement. If Union City were not able to secure the funding for the Proposed Action, the site would likely remain unchanged, no environmental impacts would be anticipated, and the economic benefits associated with the Action Alternative would not be accomplished.

Under the Action Alternative, TVA would provide InvestPrep funds to Union City, to be matched with non-TVA funds to facilitate the development of a portion of the NTNRIC. TVA funds for the 70-acre Project Area would be used for clearing 3.31 acres of trees. Felled trees and stumps would be removed and burned on site. The Proposed Action includes the construction of a 100,000-SF gravel building pad and associated parking/truck court areas. Approximately 53,300 cubic yards of cut and fill would be needed to excavate a temporary sediment pond and detention basin and balance the gravel building pad, but no off-site borrow would be required. Gravel (four inches thick) would be added to the building pad upon completion. The Action Alternative also includes the addition of gravel to the existing dirt road to create a marketing road that would be 16 feet wide, and the creation of a new gravel driveway to connect the gravel marketing road and the gravel building pad. Following the

site improvements, the disturbed areas would be stabilized with seed and mulch. Activities required for the Action Alternative would occur over approximately 12 months and would require a small workforce that would most likely be assigned from a local contractor.

TVA's preferred alternative is the Proposed Action Alternative. This alternative would meet the purpose of the Project and would further 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 impact on solid and hazardous wastes, aquatic zoology, land use, prime farmland, managed and natural areas, and recreation.

Resources that could potentially be impacted (negatively or positively) by implementing the Action Alternative include air quality and climate change, groundwater, soils, floodplains, surface water, wetlands, terrestrial zoology, and botany. Implementation of the Action Alternative could create potential impacts to the human environment, including archaeology and historic resources, visual effects, noise, socioeconomics, and transportation issues.

Construction-related activities, including the burning of trees and stumps, would result in minor and short-term impacts to air quality and climate change. With the use of best management practices (BMPs), impacts would be minimal, temporary, and localized; and would not be anticipated to result in any violation of applicable ambient air quality standards, impact regional air quality, or affect nearby persons.

Near-surface grading activities would not intersect with public groundwater supplies in the area, and effects to groundwater would be minor.

Soils would be disturbed by the Proposed Action, including tree clearing, tree and stump burning, and grading. Stabilization of disturbed soils following grading to sufficiently reduce sedimentation would occur by the implementation of erosion control measures in accordance with a project-specific construction general permit/stormwater pollution prevention plan. BMPs would be used during site development to avoid soil runoff into surface water in the Project Area. These factors would effectively avoid or minimize impacts on soils and from soil erosion.

A small portion of the southern Project Area lies within the 100-year floodplain of Pursley Creek. The exact final location of the proposed gravel building pad and detention pond is not known; however, ground disturbance would be limited to areas at or above the existing ground elevation of 344.5 feet mean sea level (msl) within the Project Area, which would be at least one foot above the 100-year flood elevation of 343.5 ft above msl. To minimize negative impacts, tree-clearing debris would be disposed of in areas with existing ground elevation above 343.5 feet, which would be outside the 100-year floodplain; therefore, the tree clearing would be consistent with EO 11988. Indirect impacts would be minimized by using standard BMPs during construction.

Brophy-Heineke and Associates identified one wet weather conveyance/ephemeral feature (WWC-5) in 2023 in the northern part of the Project Area, as subsequently confirmed by jurisdictional determinations from TDEC (in 2023) and the U.S. Army Corps of Engineers (USACE) (in 2025). Stantec's January 2025 surface water field surveys covered the portion of the

Project Area south of the Brophy-Heineke and Associates study and identified two intermittent streams (S001 and S003), which would be avoided by Union City's design plan. Five additional wet-weather conveyance/ephemeral features and one wetland (W001) were also identified by Stantec. No ponds or lakes were identified within the Project Area. Under the Action Alternative, wetland W001 would also be avoided by Union City's design plan. The intermittent streams and wetland would be avoided. There would be no direct impacts to streams and wetlands, and coordination with the USACE and TDEC would not be required. Given these factors, implementation of the Proposed Action would be consistent with EO 11990 and the Clean Water Act Sections 401 and 404. No perennial streams or ponds were identified in the Project Area, so common aquatic species would not be impacted, and no rare, threatened, or endangered aquatic species protected under the Endangered Species Act (ESA), or habitat suitable for listed aquatic species occur in the Project Area.

The Proposed Action would not significantly affect populations of wildlife species common to the area, as the amount of habitat to be removed is relatively small, of lower quality, and similar herbaceous habitats and forested fragments exist in the surrounding landscape. Under Section 7 of the ESA, the Proposed Action would not jeopardize the continued existence of the Alligator snapping turtle, and there would be no effects due to lack of suitable nesting habitat observed within the Project Area. Although not optimal, migration habitat for the whooping crane (classified as an experimental, non-essential population) exists within the Project Area, but this species would be mobile and expected to flush if present during the Proposed Action. Similarly, suitable habitat is available outside of the Project Area. As such, the Proposed Action would not jeopardize the continued existence of whooping crane and any effects would be minor. Grading could impact monarch butterfly foraging habitat; however, significant impacts would not be anticipated as these impacts would be expected to be minor due to the small quantity of habitat potentially present in the Project Area. The Proposed Action would not jeopardize the continued existence of this species.

No caves or other hibernacula for the tricolored bat exist in the project footprint or would be impacted by the Proposed Action. Approximately 3.25 acres of suitable summer roosting habitat for tricolored bat are proposed for removal as part of proposed activities. Obion County, Tennessee, is considered within the range where tricolored bats hibernate. TVA recommends that Union City remove trees outside of the pup season (May 15 to July 31) to avoid direct impacts to tricolored bats. The Action Alternative would not jeopardize the continued existence of tricolored bats and any impacts would be minor. The Proposed Action would also be in compliance with the National Bald Eagle Management Guidelines.

Impacts to common plant species removed or disturbed would be minor and insignificant. Approximately 3.31 acres of trees would be cleared in the Project Area. No habitat for uncommon or rare plant communities is present within the Project Area or would be affected by the Proposed Action. No plants protected under the ESA, or habitat suitable for listed plant species, or state-listed plants are present in the Project Area.

Given that there are no known historic structures identified within the Project Area and that the Proposed Action under the Action Alternative does not involve the construction of aboveground resources, no historic architectural resources would be impacted by the Proposed Action under the Action Alternative, directly or visually. As such, no Phase I historic structures surveys were required. TVA concludes that no effects to historic sites or structures would occur with the

Proposed Action under the Action Alternative. Stantec conducted a Phase 1 archaeology survey in 2025, which identified two isolated find locations within the Project Area; however, evaluation of these two finds resulted in a recommendation that no further archaeological work was needed. In addition to the isolated finds, Stantec also investigated the extant remains of a feedlot and utility building situated in the northeast corner of the cultural resources area of potential effects. Stantec determined these remains to be modern and do not represent an archaeological site. On February 7, 2025, the Tennessee Historical Commission-State Historic Preservation Office concurred with Stantec's report and TVA's findings that no historic properties eligible for listing in the National Register of Historic Places would be affected by the Project.

Construction vehicles and equipment visible during grading activities would have a minor visual impact over the temporary construction period, as well as minor permanent impact due to grading. This change would be minor given the brief period that drivers would be in the area and given the existing setting as an industrial park. Implementation of the Action Alternative would result in a minor decrease in visual quality for residents in the viewshed.

Construction 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, when ambient noise levels are often higher, and most individuals are less sensitive to noise. Carmen Cemetery is located along the northern border of the Project Area, it would continue to be screened from noise by a medium-dense forested area, thereby reducing potential noise impacts. It is anticipated that sound levels would not exceed 85 decibels at the Project Area boundary per Occupational Safety and Health Administration standards. Thus, noise-related impacts resulting from the implementation of the Action Alternative are anticipated to be temporary and minor.

Minor beneficial socioeconomic impacts during the construction of the Proposed Action would occur. No long-term impacts to community services are anticipated and there would be no impacts to low-income communities in the area.

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

Mitigation

To minimize or reduce the environmental effects of site activities associated with the Action Alternative, Union City or its contractors would ensure all grading activities conducted would be in compliance with stormwater permitting requirements and use applicable BMPs to minimize and control erosion and fugitive dust during these actions. Vegetating with non-invasive species would minimize the potential introduction and spread of invasive species in the Project Area. Wetland W001 and intermittent streams S001 and S003 would be avoided, and a 30-foot buffer would be maintained.

Union City would also limit ground disturbance to areas at or above the existing ground elevation of 344.5 feet mean sea level (msl) within the Project Area. Additionally, tree-clearing debris would be disposed of in areas with existing ground elevation above 343.5 feet.

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 nearby stream channels from direct surface runoff. Servicing of equipment and vehicles is expected to be done with care to avoid leakage, spillage, and subsequent surface or groundwater contamination. Oil waste, filters, and other litter would be collected and disposed of properly.

Conclusion and Findings

Based on the findings listed above and the analyses in the EA, we conclude that the Proposed Action of TVA funding to assist with the development of a portion of the NTNRC would not be a major federal action significantly affecting the environment. This finding is dependent on the implementation of the mitigation measures described above. Accordingly, an environmental impact statement is not required.



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Date Signed