

**FINDING OF NO SIGNIFICANT IMPACT**  
**TENNESSEE VALLEY AUTHORITY**  
ECONOMIC DEVELOPMENT GRANT PROPOSAL FOR  
SPRINGS INDUSTRIAL PARK  
Marshall County, Mississippi (Holly Springs)

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 Marshall County Industrial Development Authority (MCIDA) to assist with the development of the Springs Industrial Park. The area of TVA's proposed action (herein referred to as the Project Area) comprises 103.3 acres of the total 1,200-acre Springs Industrial Park and is located 0.5 mile east of the intersection of United States (U.S.) Highway 78 and Landfill Road and 3.3 miles northwest of Holly Springs, Mississippi (MS). There would be minor impacts as a result of the Proposed Action. The entirety of the 103.3-acre Project Area could experience future industrial development following implementation 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 MCIDA. 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 MCIDA 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 MCIDA 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 MCIDA, facilitating the improvement of the Project Area within the Springs Industrial Park. TVA funds would be used for the purchase of the 103.3-acre Project Area, clearing of 16.7 acres of trees, and grading of a dirt-building pad. Work associated with the dirt-building pad would require 27.6 acres of earth disturbance to create a 20.0-acre dirt-building pad. The Appalachian Regional Commission (ARC) is funding an access road and other activities outside the Project Area that would be under construction or built prior to TVA issuing a Notice to Proceed (NTP). The access road would be built between the two areas of dirt work for the proposed building pad.

Implementation of the Action Alternative would result in disturbance of the Project Area in preparation for industrial use. The MCIDA or its contractors are expected to implement appropriate measures, such as construction 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 hours only. They are also expected to obtain all required permits and follow all permit conditions.

TVA has determined that the Proposed Action, subsequent to TVA's selection of the Action Alternative, would have no impact on floodplains, land use and prime farmland, wetlands, natural areas, recreation, or archaeology and historic structures and sites. The Proposed Action would also 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, groundwater, surface water, aquatic ecology, terrestrial zoology, and botany. Implementation of the Action Alternative could create minor potential impacts to the human environment, including visual effects, noise, socioeconomics and environmental justice, and transportation issues.

A November 2020 field review conducted by qualified wetland and waterbody experts documented two (2) streams (Stream-1 and Stream-2) and five (5) ponds (Pond-1, Pond-2, Pond-3, Pond-4, and Pond-5) in the Project Area. Additional streams, wetlands, and ponds were found within the Springs Industrial Park. In 2018, the United States Army Corps of Engineers (USACE) conducted a jurisdictional determination for the Springs Industrial Park. The USACE jurisdictional determination noted that Stream-1 and Stream-2 were jurisdictional, while the five (5) ponds were non-jurisdictional stock ponds. No work is proposed within or adjacent to Stream-1, Stream-2, Pond-4, or Pond-5. The remaining three (3) ponds (Pond-1, Pond-2, and Pond-3) are within the area proposed for earth disturbance activities to support the construction of the dirt-building pad. No other aquatic features are within the area of proposed earth disturbance activities. A dredge and fill authorization from the USACE under Section 404 of the Clean Water Act (CWA) and Section 401 Water Quality Certification from the Mississippi Department of Environmental Quality (MDEQ) would not be required for the 0.59 acre of impacts to the three (3) ponds because they were determined to be non-jurisdictional.

A December 2020 environmental survey of the Project Area identified summer roosting habitat (trees) for Indiana bat and northern long-eared bat (NLEB). No winter bat habitat was observed within the Project Area. Foraging habitat for both species occurs over, alongside, and through the forest fragment, the streams, wet-weather conveyance, and the ponds in the Project Area and adjacent areas throughout Springs Industrial Park. 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 the federal Endangered Species Act (ESA) Section 7(a)(2) and completed in April 2018. 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 5 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 federally listed bats.

A Phase I cultural resources investigation was performed in the fall of 2018 that included both an assessment of standing structures as well as archaeological survey of the Project Area. Two archaeological sites (22MR724 and 22MR725), consisting of a historic artifact scatter, house site, and one isolated find (IF1), consisting of historic brick and stoneware fragments, were recorded inside the Project Area. All three resources were recommended as ineligible for the National Register of Historic Places (NRHP). Although lands within the original larger survey area for the Springs Industrial Park were reported to be associated with a historic Chickasaw

presence, neither 22MR724 nor 22MR725 are believed to have this association. An architectural survey was conducted to cover the historic structures viewshed for the much larger Springs Industrial Park survey area. The only extant structure (Structure 1) present in the Project Area is a double crib wood frame barn that appears to show multiple expedient repair episodes. No association with historic events or persons important in history was found, and the barn's integrity of setting, materials, workmanship, feeling, and association is compromised because of the replacement materials and the overgrown and abandoned environment. Therefore, the barn is recommended as not eligible for the NRHP. The only other structures in the 0.5 mile viewshed extent for the Project Area are Structures 2-7 (dairy farm outbuildings), Structure 8 (crib wood frame barn), and Structure 9 (wood frame house). All of these buildings are separated from the Project Area by dense foliage and intervening upland landforms. All of these resources are recommended as ineligible for NRHP due to their abandoned, dilapidated state, multiple episodes of ramshackle repair, and an overall lack of integrity. The Duke-Walker Cemetery is located outside the southwest corner of the Project Area and is a heavily wooded, fenced-in location. Although not eligible for the NRHP, it is recommended the cemetery be protected from any future ground-disturbing activities. TVA is advising the present project that care should be taken to avoid any ground disturbance within 50 meters of the cemetery boundary and that the buffer should be visible on any project construction plans. Adjacent to the southwest corner of the Project Area is the Burlington Northern-Santa Fe (BNSF) Railroad. The overall setting of the railroad would not be compromised by the proposed project and will not prevent the railroad from being eligible for the NRHP. Therefore, the project would have no adverse effect on the railroad. No further archaeological work is recommended in the Project Area. TVA consulted with the Mississippi Department of Archives and History (MDAH) – Historic Preservation Division, the State Historic Preservation Office (SHPO), in a letter dated January 14, 2021 regarding TVA's findings and recommendations. In a letter dated January 25, 2021, the Mississippi SHPO concurred with TVA's findings of no effect. Pursuant to 36 CFR 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. The Muscogee (Creek) Nation responded on February 23, 2021 and concurred there should be no effects to any known historic properties, but requested work to cease and to be notified (along with other appropriate agencies) if inadvertent discoveries occur during construction. No other responses from federally recognized Indian tribes have been received.

## **Mitigation**


To minimize or reduce the environmental effects of site activities associated with the Action Alternative, the MCIDA 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. Onsite burning activities would be conducted in compliance with local burn permits, the requirements in MDEQ Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants, 11 Mississippi Administrative Code, Part 2, Chapter 1. Rule 1.3 (G), and appropriate conservation measures identified in the TVA Bat Strategy Project Screening Form (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.

Specific avoidance and conservation measures would be implemented as a part of the Action Alternative to reduce effects to Indiana bat and NLEB. These measures are identified in the TVA Bat Strategy Project Screening Form (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 Springs Industrial 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.



March 25, 2021

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Date Signed