

FINDING OF NO SIGNIFICANT IMPACT
TENNESSEE VALLEY AUTHORITY
OCOEE 1 HYDRO CONSOLIDATION

Tennessee Valley Authority (TVA) proposes to consolidate people and functions from three existing Ocoee 1 Hydro Dam (O1H) administrative houses into a new administration building and then dispose of the vacated buildings. The proposed new one-story administration building at O1H would house relocated administrative functions, allowing the three houses to be vacated. The proposed vacating of these three houses would result in options for disposal, including abandoning the three administrative buildings by license, easement grant, or demolition (individually or together). The decision TVA must make is whether to consolidate the three administrative buildings into a one, newly constructed building (action alternative), or continue under the no action alternative.

The action alternative is needed because staff and operations at O1H are inefficiently divided between three antiquated administrative buildings O1H PSS Building AEM8474 (White House, or Ocoee Assembly Building), O1HTODA Building AEM8475 (Rock House, or Ocoee Main Office), and O1H Plant Office O1PO (Plant House or Ocoee Regional Office). In order to function in a more safe, efficient, and economical manner, the action alternative will consolidate people and functions from the three existing buildings into one new building. The proposed consolidation of the buildings stems directly from the real estate strategy to effectively manage real estate, reduce costs, and maximize revenue. The three O1H administration houses used for the Hydro Plant's administrative functions were targeted by Strategic Real Estate & Governance (SREG) in 2017. Reducing the administrative space aligns with TVA's Strategic Real Estate Plan (SREP), which proposes to reduce Operation & Maintenance (O&M) expenses, right-size portfolio, reduce the footprint, reduce and avoid capital expenditures, and provide economic development opportunities. Additional benefits of this project include consolidating functions inside the security perimeter, reducing renovation costs associated with building upkeep, and eliminating aging infrastructure that does not meet modern-day building codes.

Alternatives:

Under the No Action Alternative, TVA would not perform any consolidating at O1H. The current operations of the three O1H administration houses (O1H PSS Building AEM8474 White House/Ocoee Assembly Building, O1HTODA Building AEM8475 Rock House/Ocoee Main Office, and O1H Plant Office O1PO/Ocoee Regional Office) would continue and the new administration building would not be constructed.

Under the Proposed Action Alternative A, TVA proposes to consolidate the operations and functions from the three existing O1H administration houses (O1H PSS Building AEM8474 [White House/Ocoee Assembly Building], O1HTODA Building AEM8475 [Rock House/Ocoee Main Office], and O1H Plant Office O1PO/Ocoee Regional Office) into a new building and dispose of any or all of the three O1H administration houses via license or easement grant of the buildings (individually or together). The license or

easement grant to a third party would not convey the United States of America's underlying fee interest held on behalf of TVA. A license agreement grants permission for a third party to use the property for a shorter period of time. The easement grant can convey more rights to the third party and can be short-term, longer-term or permanent. The three O1H administration houses would remain in place on the property; however, they would no longer be considered part of the O1H facility. Site preparation and construction would include a laydown area and a concrete truck washout and disposal area. The new building will be connected to a new underground septic system and potable water supply. The existing paved drive will be extended and potentially cut in order to gain access to the new building. The new building will be secured with badge readers, cameras and upgraded Information Technology (IT) connectivity.

Under the Proposed Action Alternative B, TVA proposes to consolidate the operations and functions from the three existing O1H administration houses (O1H PSS Building AEM8474 [White House/Ocoee Assembly Building], O1HTODA Building AEM8475 [Rock House/Ocoee Main Office], and O1H Plant Office O1PO/Ocoee Regional Office) into a new building and dispose of any or all of the three O1H administration houses via demolition (either individually or together). Site preparation for the construction of the new building is consistent with those outlined in Alternative A.

Impacts Assessment:

Under the action alternative, temporary and minor impacts are anticipated for aquatic and botanical resources, managed and natural areas, terrestrial zoology, floodplains, parks and recreation, surface water and soil erosion, transportation, air quality, climate change, noise, geology/groundwater, solid & hazardous wastes/materials, and visual resources. These minor impacts include sedimentation and runoff from ground disturbing activities and impervious surfaces; construction traffic, noise, and air emissions; construction waste disposal; installation of a septic leach field; and visual impacts during construction. To ensure minimal impacts to terrestrial zoology, a honeybee colony will be relocated from the Rock House/Ocoee Main Office prior to disposal of the building.

In addition to the minor/temporary impacts noted above, additional impacts include adverse effects to the O1H structures (demolition of the buildings, as applicable) and visual impacts to the setting (the construction of a new one-story consolidation building and its impact on the landscape). O1H is listed on the National Register of Historic Places (NRHP) and the construction of a new building will pose an adverse visual impact on the setting. Impacts to cultural resources will be mitigated through a Memorandum of Agreement (MOA) with SHPO as outlined in the mitigation measures below. Additionally, a cemetery reportedly exists within the boundaries of the project. A ground penetrating radar (GPR) study was conducted to identify anomalies that may indicate the location of the cemetery and to ensure that the cemetery is not impacted during any demolition activities. Anomalies identified in the GPR study will be avoided during construction with an established 10' buffer.

Public and Intergovernmental Review:

A draft of the EA was released for public review and comment on February 3, 2021. TVA received 50 comment submissions, which included letters, form letters, emails, and submissions through the project website. TVA has considered all of the substantive comments it received on the draft EA and has responded to them in the final EA as appropriate. TVA completed consultation with the Tennessee SHPO under Section 106 of the National Historic Preservation Act concerning impacts to historic properties through a MOA that outlines mitigation strategies for the action alternatives. Appropriate recognized Native American tribes were consulted concerning the proposed undertaking. TVA received no objection from any of the tribes, nor did any of the tribes express a desire to participate in the MOA. In addition, TVA consulted with the USFWS under Section 7 of the Endangered Species Act and USFWS concurred with TVA's effect determinations.

Mitigation:

TVA's analysis includes mitigation, as required, to reduce or avoid, minimize, or reduce adverse effects. Project-specific BMPs are also identified.

- To minimize impacts to surface waters, the following mitigation measures will be incorporated:
 - TVA would implement BMPs as described in *A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority* (TVA 2017), *Tennessee Erosion and Sediment Control Handbook* (TDEC 2012), and SWPP would be implemented before any ground disturbing activities in order to minimize stormwater impacts.
 - Stabilization of the project area would be completed using non-invasive native vegetation species after demolition and construction to further prevent stormwater runoff
- To minimize impacts to cultural resources, the following mitigation measures will be incorporated:
 - Regardless of the alternative chosen, TVA will conduct a new architectural resource survey and assessment of O1H and update the NRHP documentation for O1H.
 - Regardless of the alternative chosen, any of the administrative houses that are no longer utilized, TVA will properly mothball them. TVA will prepare a condition assessment of the house; stabilize the house, based on the condition assessment; and follow guidance outlined in the NPS Preservation Brief 31: Mothballing Historic Buildings.
 - Under Proposed Alternative A, if TVA elects to dispose of any of the three TVA-owned houses through license or granting of an easement, disposal would be completed under the following conditions: license/easement documents would require review of any proposed renovation/alteration plans by TVA's Cultural Compliance staff to ensure that any alterations or

- renovations carried out by the licensee or easement holder are in keeping with SOI standards for the treatment of historic properties; and ground disturbance within the 50-meter buffer around potential burials and within the footprint of each house is prohibited. If these conditions cannot be met or the licensee or easement holder does not agree to accept them, TVA would assist in the development and completion of appropriate mitigation to offset adverse effects to any of the three houses.
- Under Proposed Alternative B, if TVA elects to dispose of any or all of the three houses through demolition, disposal would be completed under the following conditions: TVA would ensure that any or all three of the administrative houses are documented prior to demolition; prepare state-level documentation including photographic and written documentation of the structure, current photographs, historic photographs, and any known maps depicting the resource(s) and would allow the TN SHPO to review prior to final submittal for documentation in the Tennessee State Library and Archives. Additionally, under Proposed Alternative B, if TVA elects to demolish the Main Office (Rock House) and/or the Assembly Building (White House), TVA will adhere to the conditions outlined in the Memorandum of Agreement (MOA) for this project in order to avoid any potential adverse effects on the Shields-Parksville Cemetery during any physical work taking place within the boundary.
 - Given the potential for deeply buried archaeological resources within the footprint of the existing plant in the river terrace, an archaeological monitor should be present during these excavations to ensure there are no impacts to potentially significant archeological resources.
 - SHPO and Tribal consultation was completed for this project. An MOA for this project was executed between TVA and the Tennessee State Historic Preservation Office.
- To minimize impacts to floodplains, the following mitigation measures will be incorporated:
 - Any demolition material resulting from the project would be disposed of at a location outside of 100-year floodplains
 - To minimize impacts to terrestrial species and federally threatened and federally listed terrestrial species, the following mitigation measures will be incorporated:
 - Trained experts will remove and relocate the honeybee colony from the Rock House/Ocoee Main Office prior to demolition
 - Bat surveys will be conducted of the attics within the Rock House/Ocoee Main Office and White House/Ocoee Assembly Building in the summer months prior to demolition. Any common bats found will be excluded using techniques approved by Tennessee Wildlife Resources Agency. Conservation Measures including those related to building demolition are identified on the TVA Bat Strategy Project Screening Form and will be followed in accordance with

TVA's programmatic consultation with the U.S. Fish and Wildlife Service on routine actions and federally listed bats in accordance with ESA Section 7(a)(2) and completed in April 2018.

Conclusion and Findings:

Based on the findings and analyses in the EA and adherence to the mitigation measures listed above, TVA concludes that this previously proposed action at O1H would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.



S. Dawn Booker
Manager
NEPA Programs

02/09/2022

Date Signed