

REVISED FINDING OF NO SIGNIFICANT IMPACT TENNESSEE VALLEY AUTHORITY

WETLAND IMPACTS AND MITIGATION
HAMPTON STATION 500-KV SUBSTATION
FINAL ENVIRONMENTAL ASSESSMENT
MONTGOMERY COUNTY, TENNESSEE
EAXX-455-00-000-1743073135

In October 2025, the Tennessee Valley Authority (TVA) issued a Finding of No Significant Impact (FONSI) related to its proposal to supply the load demands requested by two customers, Google and LG Chem, and to provide additional capacity and reliability benefits for the Clarksville, Tennessee and Hopkinsville, Kentucky regions by constructing and operating the new Hampton Station 500-kilovolt (kV) Substation and associated transmission lines. The FONSI was based on TVA’s environmental analysis in an environmental assessment (EA) also completed in October 2025.

While TVA was coordinating with the Tennessee Department of Conservation (TDEC) to comply with permitting requirements under the Clean Water Act, TVA specialists and TDEC made a coordinated visit to the project area. At the November 2025 visit, TVA and TDEC made the determination that three additional wetland features overlap with the proposed Hampton Station 500-kV Substation footprint within the 107-acre proposed substation parcel either fully or partially. TVA is issuing a revised FONSI to address previously undocumented impacts to the three wetland features delineated during the November site visit and to outline remediation measures.

I. Background

Sections 1.1 and 1.2 of the 2025 EA, which is incorporated herein by reference, describe the purpose and need for the proposed project. TVA’s proposed Hampton Station 500-kV Substation and associated transmission lines are needed to support the Google load expansion and to supply the load for the new LG Chem battery cathode facility, which is currently under construction. TVA would also construct two 0.8-mile-long 161-kV loop lines and new 0.5-mile-long 161-kV transmission lines to connect the proposed substation to TVA’s transmission system. About 17.5 acres would be required for these transmission line right-of-way (ROW) easements.

TVA’s proposal includes the purchase of an approximate 107-acre site for the proposed substation located outside the municipality of Clarksville in Montgomery County, Tennessee. The proposed substation would be constructed adjacent to TVA’s existing Montgomery 500-kV Substation and the new LG Chem 161-kV Substation. As part of the 107-acre land acquisition, TVA would purchase and remove a residential house. A new, 284-foot-long permanent access road would be constructed on the proposed 107-acre substation parcel immediately off Charles Bell Road. Approximately 48 acres of the 107-acre parcel would be disturbed during construction of the new facility; however, the substation and access road would occupy approximately 35 acres. See Figure 2-1

in section 2.2.1.1 of the 2025 EA (page 13). The 2025 EA addresses the proposed construction, operation, and maintenance of the new substation and associated transmission lines as well as the purchase of the proposed substation parcel for satisfying the project's purpose and need or taking no action.

II. Updated Wetland Information

In Section 3.7 of the 2025 EA, TVA identified one 0.31-acre scrub-shrub fringe wetland as W001, around a 0.08-acre pond (P002), in the north central portion of the proposed substation parcel. The location of wetland W001 was shown in Figure 3-3 in section 3.2.1 of the 2025 EA (page 34). Under TVA's proposal, both the fringe wetland W001 and pond P002 would be filled for the construction of the proposed substation. As noted in the 2025 EA and FONSI, these impacts would be mitigated by TVA's compliance with all USACE and TDEC mitigation requirements in addition to Executive Order (EO) 11990 (Protection of Wetlands). In this context, the impacts to wetland W001 would be kept to a minimum on a watershed scale and the Action Alternative's impacts to wetlands were found to be insignificant.

In early November 2025, TVA specialists and TDEC visited the project area to reassess the wetland areas on the proposed substation parcel to review information provided in TVA's initial Hydrologic Determination (HD) Concurrence Request submittal. TDEC and TVA identified and delineated three additional wetland features on the proposed substation parcel. The three wetlands, identified as W002, W003, and W004, overlap with the proposed Hampton Station 500-kV Substation footprint within the substation parcel either fully or partially (see Figure 1 below, which updates wetland information found in Figure 3-3 of the EA). Wetland determinations were performed according to the United States (U.S.) Army Corps of Engineers (USACE) standards, which require documentation of hydrophytic (wet-site) vegetation, hydric soil, and wetland hydrology (Environmental Laboratory 1987; USACE 2024; USACE 2012). Based on the new determinations, TVA submitted an updated HD Concurrence Request report to TDEC with information about the three additional wetland areas.

The identification of additional wetland features results in the need for TVA to update its previous impact analysis because, based on these findings, the proposed Action Alternative would result in impacts to wetland features previously unaddressed.

The additionally identified wetland features (W002, W003, and W004) are all emergent, closed depression wetlands totaling 5.83 acres, of which, 4.71 acres would be impacted by the proposed action. W002 is a total of 1.92 acres, W003 is a total of 2.22 acres, and W004 is a total of 1.69 acres. The wetland features W002 and W004 would be totally filled by the construction of the proposed substation and a stormwater detention pond (see Figure 2 below). The wetland feature W003 would be partially filled by 1.1 acres of grading and substation construction and kept in a perpetually emergent state due to vegetation management practices around the substation. Including the 0.31-acre wetland feature W001 previously assessed in the 2025 EA that would be filled, project-related impacts to the four emergent wetland features would total 5.02 acres.

TVA: Hampton Station Overview



Figure 1. Proposed Substation Parcel Showing Wet-Weather Conveyances/Ephemeral Streams, Ponds, and Wetlands (Updated November 2025)

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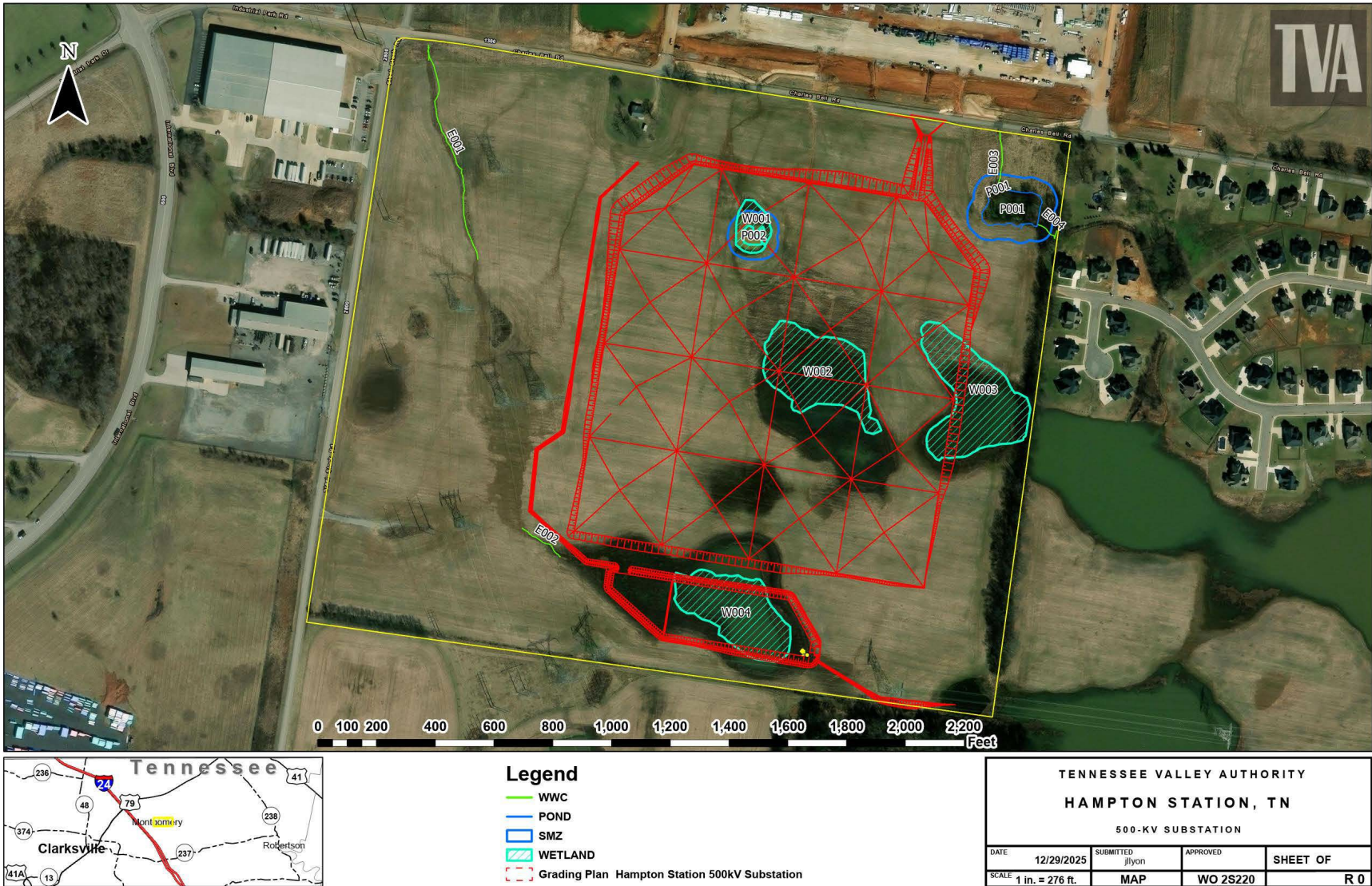


Figure 2. The Four Wetland Features with the Proposed Substation Grading Plan Overlay

III. Revised Mitigation and Consultation

Impacts to these wetlands will require mitigation by TVA, based on ongoing coordination with TDEC and TVA's responsibilities under EO 11990. Activities in wetlands are regulated by state and federal agencies to ensure no net loss of wetland resources. Under Clean Water Act Section 404 [33 USC § 1344], activities resulting in the discharge of dredge or fill material to waters of the U.S., including wetlands, must be authorized by the USACE through a Nationwide, Regional, or Individual Permit to ensure no more than minimal impacts to the aquatic environment. Section 401 of the Clean Water Act requires state water quality certification for projects in need of USACE approval. In Tennessee, the Tennessee Department of Environment and Conservation is responsible for issuance of water quality certifications pursuant to Section 401/Aquatic Resource Alteration Permit. In addition, EO 11990 requires federal agencies to minimize wetland destruction, loss, or degradation, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities to the extent practicable.

To mitigate the project impacts to 5.02 acres of the emergent wetland area, TVA is proposing to purchase wetland credits to offset the impacts on the watershed scale at a ratio deemed appropriate by TDEC and USACE. Purchase of mitigation banking credits is primary on USACE's mitigation hierarchy list, due to the current establishment of the wetland features within the mitigation banks at time of purchase leading to no temporal loss of resource function across the watershed. TVA will be purchasing wetland mitigation banking credits to compensate for the loss of wetland function and comply with all applicable regulatory requirements. Additionally, TVA's best management practices would be utilized for work around unimpacted wetland areas to avoid and minimize unintended impacts. These mitigation measures will ensure that the project's impacts to wetlands are insignificant.

Other than these new wetland measures, the proposed project is unchanged and will be implemented as described in the October 2025 EA and FONSI. TVA will implement the routine environmental protection measures as listed in the October 2025 EA to avoid or minimize potential adverse environmental effects resulting from the proposed activities.

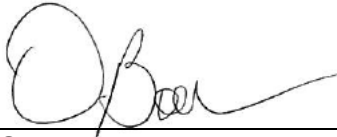
IV. Applicable NEPA Documents

The related environmental documents concerning this assessment are listed below and are incorporated by reference, as appropriate.

- *TVA, October 2025, Hampton Station 500-kV Substation Finding of No Significant Impact*
- *TVA, October 2025, Hampton Station 500-kV Substation Final Environmental Assessment*

V. Conclusion and Findings

Based on the findings of the 2025 EA and additional analysis addressed herein, TVA concludes that the proposed actions to supply the load demands requested by two customers, Google and LG Chem, and to provide additional capacity and reliability benefits for the Clarksville and Hopkinsville regions by constructing and operating the new Hampton Station 500-kV Substation and associated transmission lines would not be a major federal action significantly affecting the environment. Accordingly, an Environmental Impact Statement is not required.



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1/26/2026

Date Signed