

SUPPLEMENTAL ANALYSIS AND REVISED FINDING OF NO SIGNIFICANT IMPACT TENNESSEE VALLEY AUTHORITY

ROCK ISLAND STATE PARK ADDITIONAL EASEMENT AREAS WARREN COUNTY, TENNESSEE

On February 28, 2020, the Tennessee Valley Authority (TVA) issued a finding of no significant impact (FONSI) related to an 11.6-acre road right-of-way (ROW) easement request by State of Tennessee Department of Transportation (TDOT), a 367-acre recreation easement, and an up to 5-acre commercial recreation easement request by State of Tennessee Department of Environment and Conservation (TDEC) at Rock Island State Park. The FONSI was based on TVA's environmental analysis in an environmental assessment (EA) also completed in February 2020.

Since the completion of the EA and issuance of the FONSI, both incorporated herein by reference, TDOT has requested an additional 1.9 acres to add to the 11.6-acre road ROW relocation easement area as well as five small temporary construction easements and a narrow drainage easement which were not included in prior plans. TVA has performed additional analysis of potential impacts to these additional areas and is issuing this revised FONSI.

I. Background

Rock Island State Park is located at Great Falls Reservoir at the confluence of the Caney Fork and Collins Rivers in Warren and White counties, Tennessee. The state park includes land owned by the State of Tennessee (State) and land owned by TVA. TDEC has operated the 367-acre portion of the state park under various TVA land use agreements since 1971. A scenic overlook, a parking area, restroom facilities, and multiple hiking trails are located on the 367 acres of TVA property.

II. Modified Proposed Action

Since the 2020 EA was completed, TDOT has identified three small areas totaling 1.9 acres that need to be added to the 11.6-acre State Route-287 (SR-287) relocation project ROW easement (see Figure 1). Further, TDOT has identified five small temporary construction easements (1.3 acres) and a narrow drainage easement (0.07 acre) which were not included in prior plans.

III. Environmental Assessment

In February 2020, TVA completed the EA and issued a FONSI for actions proposed by TDEC and TDOT at Rock Island State Park. In the 2020 EA, TVA analyzed two alternatives: a No Action Alternative and the proposed Action Alternative where TVA would enter into a 40-year agreement with the State for use and benefit of TDEC for continued operation of 367-acres of TVA public lands at Rock Island State Park. Also, TDEC proposed to restore the historic Great Falls Cotton Mill for use as a commercial recreation facility with new parking and sidewalks.

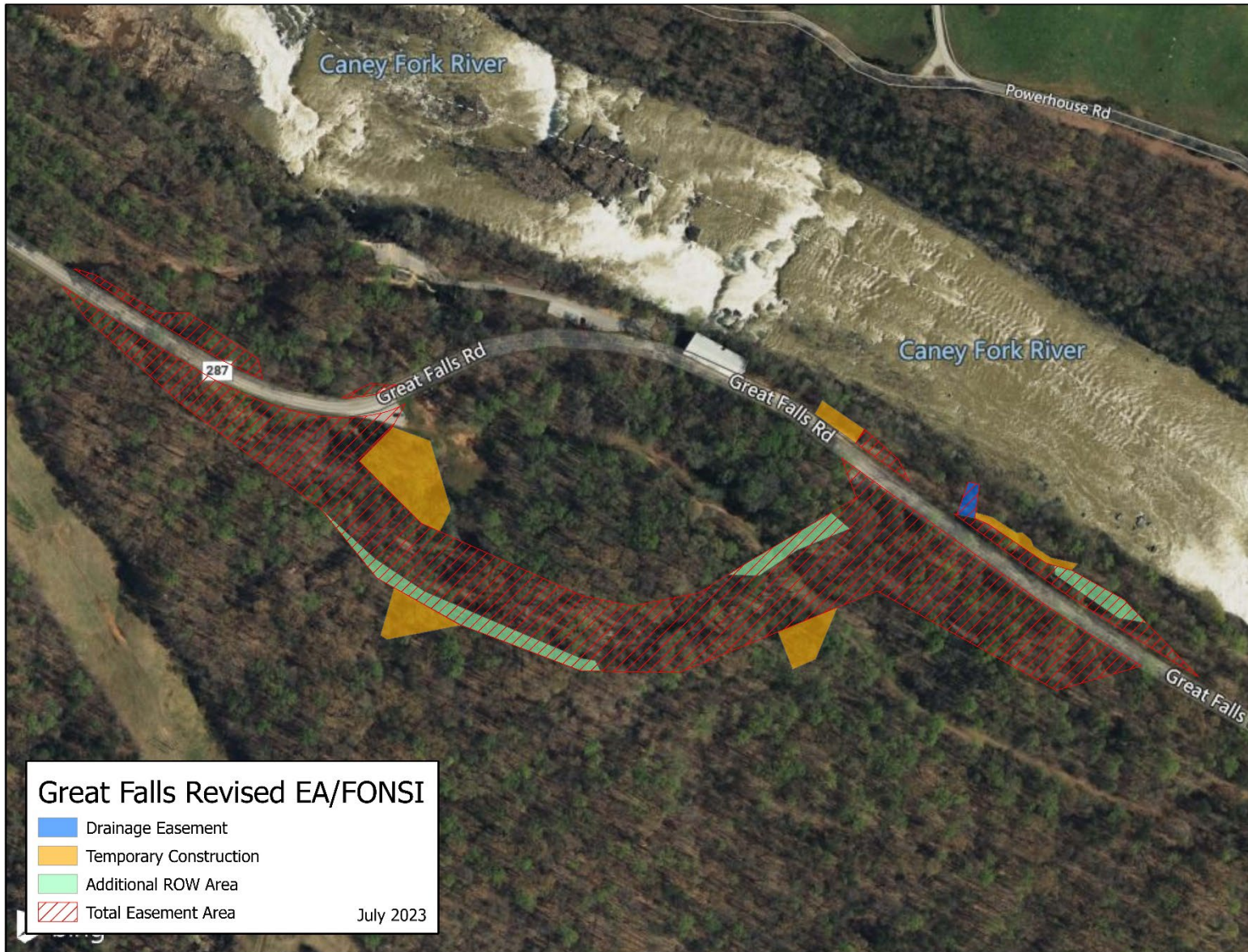


Figure 1. Expanded Project Area

The new land use agreement would allow for commercial recreation within 5 acres surrounding the mill location. In addition, a segment of SR-287 adjacent to the historic mill would be relocated to move the highway away from the historic mill area to support TDEC's plans for the historic mill and to improve safety for drivers and pedestrians visiting the state park. The SR-287 relocation proposal involved TVA issuance of an 11.6-acre permanent road ROW easement to the State for use and benefit of TDOT.

After dismissing numerous environmental resources from the 2020 EA review because they were not present in the project area, TVA reviewed archaeological and historic resources, threatened and endangered species, terrestrial ecology (vegetation and wildlife), floodplains, recreation, noise, visual resources, transportation, and socioeconomics. In the 2020 FONSI, TVA found that impacts associated with the project would not be significant and an environmental impact statement was not required.

This supplemental analysis has been prepared to review the latest revisions to the SR-287 ROW plans by TDOT including expansions of the ROW in three areas (1.9 acres), five temporary construction easements (1.3 acres), and a narrow drainage easement (0.07 acre). TVA has determined that the additional acreage would not alter the 2020 EA related to floodplains, noise, visual resources, transportation and socioeconomics, these resources are not discussed further. The analysis below considers whether the modified project area would affect archaeological and historic resources, terrestrial ecology (vegetation and wildlife), threatened and endangered species, aquatic ecology, wetlands, floodplains, and recreation and managed areas.

a. Archaeological and Historical Resources

In the 2020 EA, TVA consulted under Section 106 of the National Historic Preservation Act (NHPA) with the Tennessee State Historic Preservation Officer (SHPO) and federally recognized Indian tribes (Tribes) regarding archaeological and historical resources within the area of potential effect (APE). The following resources are within the area of potential effects (APE): three historic architectural resources; Collins River Bridge, Great Falls Hydroelectric Station, and Great Falls Cotton Mill; and three sites; an unnamed historic cemetery (40WR117), Cunningham Cemetery, and one previously unrecorded multi-component archaeological site (40WR125). Further, in consultation with the Tennessee SHPO, TVA determined sites 40WR117 and 40WR125 were eligible for listing on the National Register of Historic Places (NRHP).

TVA determined the proposed undertaking would not adversely affect the historic architectural resources with the implementation of certain avoidance measures and a specific rehabilitation plan would be needed for the historic mill to avoid adverse effects to it. A Memorandum of Agreement (MOA) was developed to ensure that cotton mill rehabilitation is consistent with National Park Service standards and to mitigate adverse effects to 40WR125. The MOA was executed by TVA and the Tennessee SHPO on February 25, 2020. The MOA called for archaeological data recovery excavations of specific locations within the proposed SR-287 ROW. The data recovery field work was completed in June 2021.

Under the modified proposed action, the latest revisions to the SR-287 ROW plans by TDOT included expansions of the ROW in three areas totaling 1.9 acres, five temporary construction easements totaling 1.3 acres, and a narrow drainage easement (0.07 acre). TVA reviewed these alterations and determined that the APE for the project includes these additional areas. TVA determined that approximately 1.0 acre would require archaeological surveys and

approximately 0.5 acre would require additional data recovery investigation. The MOA was amended to reflect the expanded APE. TVA consulted with the Tennessee SHPO and Tribes on the amendment to the MOA in April 2022 and the amended MOA was executed in October 2022.

The additional archaeological field work was completed in November 2022 and the results were provided to TVA. No additional resources were identified during the archaeological survey. In keeping with the stipulations of the MOA, TVA provided the management summary to the SHPO and Native American Tribes with an interest in Warren County in May 2023. TVA received concurrence with a finding of no adverse effect to site 40WR125 or any other cultural resources.

b. Terrestrial Ecology

Vegetation

Botanical surveys were conducted in October 2022 in the areas added to the project scope by TDOT to document plant communities and search for threatened and endangered plant species. Using the National Vegetation Classification System (Grossman et al. 1998), vegetation types observed during field surveys can be classified as a combination of deciduous forest and herbaceous vegetation with deciduous forest occupying the majority of the project area. No forested areas in the proposed project area had structural characteristics indicative of old growth forest stands (Leverett 1996).

Deciduous forest, where deciduous trees account for more than 75 percent of total canopy cover, is the most common forest type. Trees include American beech, American sycamore, bitternut hickory, eastern red cedar, northern red oak, southern red oak, sugar maple, sweetgum, tulip poplar, and white ash. The understory is comprised of hophornbeam and sourwood, woody shrubs such as autumn olive, spicebush, and winged burning bush, and the woody vines English ivy, Japanese honeysuckle and muscadine. The herbaceous layer is sparse and includes Christmas fern, dissected grapefern, and Japanese stiltgrass. Herbaceous vegetation is characterized by greater than 75 percent cover of forbs and grasses and less than 25 percent cover of other types of vegetation. Herbaceous species observed within the project area include Japanese stiltgrass, purpletop tridens, sericea lespedeza, tall goldenrod, and white crownbeard. Woody plants include Japanese honeysuckle and sawtooth blackberry.

With the additional acreage added to the project scope, approximately 12.2 acres of forest would be removed. The proposed project would not significantly affect the terrestrial vegetation of the region because plant communities observed are common and well represented throughout the region. None of the proposed project area supports high quality plant communities with significant conservation value. Converting the forest to herbaceous vegetation for the proposed project would be long-term in duration but would have minor direct and indirect impacts on vegetation.

Wildlife

As described in the 2020 EA, both herbaceous and forested vegetation in the proposed project area that may provide habitat for common wildlife species would be removed. Herbaceous vegetated areas in the action area are restricted to strips of land along the existing SR-287. Any wildlife (primarily common, habituated species) currently using these previously disturbed areas would be displaced during construction actions, but it is expected that they would return to newly created herbaceous areas along the new highway alignment upon completion of the

proposed actions. Clearing of some portion of the approximate 12.2 acres of forested habitat would take place as part of the proposed actions. These areas of forest would be removed and permanently maintained as a state highway. The actions are not likely to affect populations of species common to the area, as similarly forested habitat exists in the surrounding landscape. In addition, vegetation removal is proposed between November 15 and March 31 when most common wildlife is not breeding. The timing of the tree removal will help reduce potential impacts to wildlife because it would not occur during breeding season.

The 2020 EA also indicated that some migratory birds of conservation concern identified by the USFWS may be impacted by the proposed action. Habitat exists in the action area for prairie warbler, red-headed woodpecker, and wood thrush. It is expected that these species forage and nest in the action area. Direct effects to individual prairie warblers and wood thrushes would be avoided as tree removal is proposed between November 15 and March 31 (when these species are in wintering grounds further south in Florida, the Caribbean, and Central America). Red-headed woodpeckers are year-round residents in this area and therefore could be directly affected by tree clearing at any time of year. In winter, it is expected that individuals disturbed by tree clearing actions would be able to flush to adjacent habitats. Due to the avoidance of vegetation removal during breeding seasons, ability of red-headed woodpeckers to flush to adjacent habitats during vegetation removal, the relative abundance of similarly suitable habitat nearby, and the relatively small size of the area of disturbance, it is not expected that populations of these migratory bird species would be impacted.

TVA has reviewed the proposed modifications to the project area and determined that the additional project area would have a negligible impact on wildlife because the areas are scattered and quite small and are immediately adjacent to the areas considered in the 2020 EA.

c. Threatened and Endangered Species

Plants

Review of the TVA Regional Natural Heritage database indicates that no federally listed and five state-listed plant species have been reported within a 5-mile vicinity of the modified project area (Table 1). No federally listed plant species has been previously reported from Warren County, Tennessee. A botanical field survey completed in October 2022 indicated that no habitat for Loesel's twayblade, palamocladium, shining ladies'-tresses, short-head rush, and southern twayblade, or any other federally or state-listed plant species occurs within the modified project area. No designated critical plant habitat occurs in the project area. Because of the absence of federally and state-listed plants and designated critical plant habitat, no impacts are expected to threatened and endangered plant species or their habitat.

Terrestrial Animals

In the 2020 EA, a number of activities associated with the proposed project were addressed in TVA's programmatic consultation with the U.S. Fish and Wildlife Service (USFWS) on routine actions and federally listed bats in accordance with Endangered Species Act Section 7(a)(2) and was 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 pages 5 and 6 of the TVA Bat Strategy Project Screening Form (Attachment 2) and need to be reviewed/implemented as part of the proposed project.

Table 1. Federally and State-Listed Species in the Vicinity of the Project Area¹

Common Name	Scientific Name	Status ²	
		Federal	State
Plants			
Loesel's twayblade	<i>Liparis loeselii</i>	-	THR (S1)
Palamocladium	<i>Palamocladium leskeoides</i>	-	THR (S1)
Shining ladies-tresses	<i>Spiranthes lucida</i>	-	THR (S1S2)
Short-head rush	<i>Juncus brachycephalus</i>	-	SPCO (S2)
Southern twayblade	<i>Listera australis</i>	-	END (S1S2)
Amphibians			
Hellbender	<i>Cryptobranchus alleganiensis</i>	PS ⁴	END (S3)
Tennessee cave salamander	<i>Gyrinophilus palleucus</i>	-	THR (S2)
Invertebrates			
Cupped vertigo	<i>Vertigo clappi</i>	-	- (S1)
Monarch butterfly ⁴⁻⁶	<i>Danaus plexippus</i>	CAND	- (S4)
Mammals			
Allegheny woodrat	<i>Neotoma magister</i>	-	D (S3)
Gray bat ⁵	<i>Myotis grisescens</i>	END	END (S2)
Indiana bat ⁵	<i>Myotis sodalis</i>	END	END (S1)
Little brown bat	<i>Myotis lucifugus</i>	UR	THR (S3)
Northern long-eared bat ⁵	<i>Myotis septentrionalis</i>	THR, PE	THR (S1S2)
Rafinesque's big-eared bat	<i>Corynorhinus rafinesquii</i>	-	D (S3)
Tricolored bat ⁵	<i>Perimyotis subflavus</i>	PE	THR (S2S3)

¹ Source: TVA Regional Natural Heritage database, accessed 10/4/2022 and USFWS IPaC (<https://ecos.fws.gov/ipac/>), accessed 10/4/2022.

² Status Codes: CAND = Candidate Species for Federal Listing; END = Endangered; PE = Proposed Endangered; PS = Partial Status; THR = Threatened; UR = Under Review.

³ State Ranks: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable; S4 = Apparently Secure.

⁴Missouri and Arkansas subspecies are federally listed; Tennessee hellbender species is not federally listed.

⁵Historically this species has not been tracked by state or federal heritage programs; USFWS has determined that this species could occur within the project footprint.

⁶Species known from Warren County, Tennessee but not from within 3 miles of the project footprint.

A search of the TVA Regional Natural Heritage database in October 2022 within 3 miles of the modified project area and cupped vertigo [snail], three state-listed species (hellbender, little brown bat, and Tennessee cave salamander), one proposed endangered species (tricolored bat), and one federally listed species (gray bat). Two additional federally listed species (Indiana bat and northern long-eared bat) are known from Warren County, Tennessee. The U.S. Fish and Wildlife Service (USFWS) determined that the monarch butterfly (candidate for federal listing) could occur within the project footprint. During a field review in 2016 an additional species of state conservation concern (Rafinesque big-eared bat) was observed in the project area. See Table 1 for full species list and conservation statuses and see the 2020 EA for descriptions of the species and their respective habitats.

Eleven caves are known within 3 miles of the modified project area, the nearest of which occurs approximately 0.5 mile from the project area. No bats have been documented in this cave. No caves were observed in the entire project footprint during field reviews in 2016, 2018, 2019, or

2022. The forested section of the proposed road relocation was also surveyed for potential summer roosting sites for state and federally listed bat species. Suitable summer roosting

habitat for little brown bat, tricolored bat, Rafinesque's big-eared bat, northern long-eared bat and Indiana bat exists throughout forested areas of the project footprint. Assessment of the project area for presence of Indiana bat and northern long-eared bat summer roosting habitat followed federal guidance and resulted in the identification of approximately 12.2 acres of suitable summer roosting and foraging habitat within the highway relocation footprint (USFWS 2014; 2022). Habitat quality ranged from moderate to high based on the presence of trees with exfoliating bark, crevices, or holes, open forest understory, and proximity to water. Suitable summer roosting areas were comprised of deciduous mature hardwood stands dominated by a mixture of tulip poplar, American beech, eastern red cedar, southern red oak, and white oak. Additional foraging habitat for these species exists over the Collins River and Caney Fork, adjacent to project area.

One species of state conservation concern, five state-listed species, one proposed endangered species, and one federally listed terrestrial animal species were assessed based on documented presence within 3 miles of the project footprint. Additionally, two federally listed species and one candidate for federal listing have been assessed based on known or potential presence within Warren County, Tennessee. Of these, nine species have the potential to utilize the project area. Habitat for hellbender, Tennessee cave salamander does not exist within the project footprint. Neither hellbender nor Tennessee cave salamander would be impacted by the proposed actions.

Some suitable monarch butterfly foraging habitat occurs within the project footprint, largely along forest edges and more open areas. Foraging habitat also exists adjacent to the project footprint. No host plants required for reproduction are known from the project footprint. Impacts to populations of monarch butterflies are not anticipated as a result of the proposed actions.

Potentially suitable habitat for cupped vertigo snail occurs within the rocky cliff sides immediately adjacent to the project area along the Caney Fork River. These areas are not expected to be impacted by the proposed actions. Cupped vertigo would not be impacted by the proposed actions.

Potentially suitable habitat for the Allegheny woodrat occurs within the 11 recorded caves and the rocky cliffs immediately adjacent to the project area along the Caney Fork River. As previously mentioned above, the nearest cave occurs 0.5 miles from the action area. Neither this, nor any other cave is expected to be impacted by proposed actions. The building where woodrats were observed is not expected to be impacted. Considering this, impacts to Allegheny woodrat are not anticipated as a result of the proposed project actions.

Additional field surveys of project area were conducted in 2019 and in September 2022. The forest within the proposed road relocation area was surveyed for potential summer roosting sites for federally and state-listed bats. Surveys for Indiana bat and northern long-eared bat habitat followed the (USFWS) *Range-Wide Indiana Bat Survey Guidelines*. With the additional acreage added to the project scope, approximately 12.2 acres of suitable summer roosting habitat for Indiana bat, northern long-eared bat, and tricolored bat would be removed in association with the proposed actions. Foraging habitat for these bat species as well as little brown, gray bats, and Rafinesque's big-eared bat also occurs within and alongside the project footprint in forested areas, forest edges, and over the Collins and Caney Fork Rivers adjacent to project area. These aquatic resources would not be impacted by the proposed actions. The

project currently plans to conduct tree removal between November 15 and March 31, when the previously mentioned bat species are in winter hibernacula and not on the landscape roosting in trees. An abundance of similarly suitable forested foraging habitat occurs across immediately surrounding the project footprint.

With the use of the identified conservation measures, proposed actions are not expected to significantly impact gray bats, Indiana bats, or northern long-eared bats. As a result of these conservation measures impacts to little brown bat, Rafinesque big-eared bat, and tricolored bat are also minimized such that the proposed actions would not significantly impact populations of these species either. The proposed actions would not jeopardize the continued existence of the tricolored bat.

Aquatic Animals

No impacts to aquatic communities or sensitive aquatic species would occur; there is no habitat for aquatic species in the modified project area. Consistent with the 2020 EA, there would be no impacts to these species under the proposed activities because there is no suitable habitat for federally or state-listed species in the project area.

d. Aquatic Ecology

No aquatic features were observed during an October 2022 field survey of the modified project acre area. Therefore, no impacts to water flow, stream channels, or stream banks are anticipated to result from the proposed project.

e. Wetlands

A site survey was conducted on October 18, 2022, to identify wetland resources within the modified TDOT ROW expansion areas. Wetland determinations were performed according to U.S. Army Corps of Engineers (USACE) standards (Environmental Laboratory 1987, USACE 2012), which require documentation of hydrophytic vegetation (Lichvar et al. 2016), hydric soil, and wetland hydrology. No hydric soil, wetland hydrology, or hydrophytic vegetation were identified in combination during the field survey. Therefore, no wetlands are present in the proposed modified project area, and no wetland impacts are anticipated to result from the proposed project activities.

f. Floodplains

The proposed project modification would be located outside both identified and unmapped floodplains, which would be consistent with Executive Order 11988 (Floodplains); therefore, the proposed additional scope would have no impact on floodplains and their natural and beneficial values.

g. Recreation and Natural Areas

The recreation analysis in the 2020 EA indicated there would be insignificant impacts to trail users by the relocation of SR-287 as it would bisect the Collins River Nature Trail in two locations. Additional minor impacts to recreation opportunities would be anticipated during the construction and restoration activities associated with relocating SR-287. However, the proposed modified action would not have additional measurable impacts to recreation as the modified areas are small and immediately adjacent to the areas reviewed in the 2020 EA.

A review of the TVA Regional Natural Heritage database identified six managed and natural areas within approximately 1 mile of the modified project area (Table 2) and could potentially be impacted by the proposed project.

The Great Falls Dam Reservation and Reservoir Reservation are TVA assets and no impacts to these areas are expected because they are not immediately adjacent to the project area. The Collins River and the Rocky River are on the Nationwide Rivers Inventory for Outstandingly Remarkable Values in Cultural, Fish, Geologic, Historic, Recreational, Scenic, and Wildlife resources (managed by National Park Service). However, due the nature of this project, the impact on Collins River and Rocky River resources would be negligible. Center Hill Lake is managed by the USACE and no impacts to this area are anticipated. The project area overlaps with a portion of Rock Island State Park which is managed by the State of Tennessee. Tree removal and temporary construction impacts to this area are expected. Any potential impacts would be minimized through use of Tennessee’s standard construction BMPs (TDEC 2012).

Table 2. Managed/Natural Areas Within Approximately 1 Mile of the Project Area.

Natural Area	Acreage	Location Description
Center Hill Lake - USACE	39,704.3	0.04 mile north of proposed project
Collins River	151.6	Overlap/adjacent to existing road ROW
Great Falls Dam Reservation	18.4	0.1 miles west of proposed and existing ROW
Great Falls Reservoir Reservation	1,300.9	Adjacent to existing ROW
Rock Island State Park	1,208.9	Overlaps in some areas
Rocky River	75.1	1.1 miles east of proposed project

The proposed project modifications would not have any measurable impacts to managed and natural areas.

Permitting and Consultation

Permit and consultation requirements are described in the 2020 EA and FONSI. As noted above, TVA has consulted with the Tennessee SHPO and Tribes concerning potential impacts to cultural resources and as well as addressing potential impacts to threatened and endangered bat species through a programmatic consultation with the USFWS on routine actions and federally listed bats in accordance with ESA Section 7(a)(2).

Mitigation Measures and Commitments

TVA will continue to implement routine environmental protection measures described in the 2020 EA and FONSI to mitigate adverse impacts that may occur during project activities. Additionally, TDOT would implement construction related BMPs to avoid or minimize potential adverse environmental effects resulting from the proposed project activities. BMPs include the appropriate measures to control erosion, stabilize disturbed areas, minimize storm water impacts, and reduce sedimentation. BMPs also ensure that any construction-related waste materials are properly contained so that environmental impacts are avoided.

During its review of the modified proposed action, TVA did not identify the need for any additional non-routine measures to address impacts occurring to the expanded project areas. The following non-routine measures are described in the 2020 EA and FONSI.

To minimize impacts to cultural resources mitigation measures from the 2020 EA and FONSI below will be incorporated. The additional consultation that was completed in May 2023 and the resulting modified 2023 MOA did not result in any additional mitigation measures.

- During the February 2018 consultation, TVA committed to the following measures:
 - An MOA will be executed with TVA, TDEC, and the Tennessee State Historic Preservation Officer (SHPO) to address adverse effects to 40WR125 and to develop a treatment plan for the mill.
 - A 50-foot protective boundary (fence) will be placed around both cemeteries during the proposed undertaking. After construction is complete, a permanent fence will be erected to ensure that both cemeteries are avoided.
 - Archeological features associated with 40WR125 could exist under SR-287 and adjacent gravel parking areas. Any proposed disturbance in these areas would be monitored by an archaeologist.

To minimize impacts to threatened and endangered species mitigation measures from the 2020 EA and FONSI will be incorporated. The modified project area did not result in any additional mitigation measures.

- Several activities associated with the proposed project were addressed in TVA's programmatic consultation with the USFWS on routine actions and federally listed bats in accordance with 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 in TVA's Bat Strategy Project Assessment. TVA would document removal of potentially suitable summer bat roost tree habitat and include this information in annual reporting to the USFWS. The project currently plans to conduct the tree removal between November 15 and March 31, when Indiana and northern long-eared bats are not on the landscape. This would avoid any potential direct impact to young bats at a time when they are unable to fly. Conservation measures must be implemented as identified in the Bat Strategy Form.

To minimize impacts to floodplains, mitigation measures from the 2020 EA and FONSI will be incorporated as easement conditions. The modified project area did not result in any additional mitigation measures.

- Any future facilities or equipment subject to flood damage on the Caney Fork River downstream from Great Falls Dam will be located above elevation 775.0.
- Any future facilities or equipment subject to flood damage on the Caney Fork or Collins River upstream of Great Falls Dam will be located above elevation 821.0.
- Any future development proposed within the limits of the 100-year floodplain will be consistent with the requirements of Executive Order 11988.

- TVA retains the right to permanently flood the easement area upstream of Great Falls Dam to elevation 805, and to temporarily and intermittently flood the entire tract, and TVA will not be liable for damages resulting from flooding.
- No future facilities, including fill, will be constructed, installed, or maintained unless constructed in accordance with plans approved in advance, in writing, by TVA.
- To minimize impacts to the recreating public, the following mitigation measures will be incorporated:
- TDOT would install signage and striping at both road crossings of the Collins River Trail, which would meet DOT and TVA design specifications.

Conclusion and Findings

Based on the findings of the 2020 EA and additional analysis addressed here, TVA concludes that the modified proposed action, to review the latest revisions to the SR-287 ROW plans by TDOT including expansions of the ROW in three areas (1.9 acres), five temporary construction easements (1.3 acres), and a narrow drainage easement (0.07 acre) would not result in significant environmental impacts. Therefore, consistent with TVA’s 2020 finding, the modified proposed action would not be a major federal action significantly affecting the environment and, accordingly, an environmental impact statement is not required. This finding is contingent upon the adherence to all applicable regulatory and permitting requirements and implementation of the measures and BMPs identified above and in the 2020 FONSI that minimize or avoid potential impacts to the environment.



Dawn Booker
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07/24/2023

Date Signed

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Attachments

Attachment A – Tennessee State Historic Preservation Officer and Federally Recognized Tribes Correspondence and Memorandum of Agreement

Attachment B – Tennessee Valley Authority Bat Form