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FINDING OF NO SIGNIFICANT IMPACT TENNESSEE VALLEY AUTHORITY

WILBUR RESERVOIR BRIDGE REPLACEMENT

Carter County, Tennessee EAXX-455-00-000-1727166312

The Tennessee Valley Authority (TVA) is proposing to replace the existing roadway bridge across Wilbur Reservoir on the Watauga River in Carter County, near Elizabethton, Tennessee. The existing bridge, Wilbur Reservoir Bridge, carries Wilbur Dam Road over Wilbur Reservoir and provides the only vehicular access to local residences and important TVA hydropower and recreation facilities. After considering several options to address the condition of the existing bridge, TVA is proposing to construct a new concrete bridge just downstream of the existing bridge. Construction of the new bridge is tentatively planned to begin in 2025. Once the new bridge is constructed, TVA proposes to demolish and remove the existing bridge.

TVA's purpose and need of the Proposed Action (or Project) is to improve the safety and reliability of the bridge carrying Wilbur Dam Road over Wilbur Reservoir. The existing bridge, Wilbur Reservoir Bridge, was assembled in 1942 from a repurposed railroad bridge dating from the 1890's. It is a fracture critical truss bridge with steel trusses, concrete decking, and abutments and piers made of reinforced concrete. The bridge is currently "load posted," which means it cannot safely carry normal highway loads and has structural issues that require it to be inspected annually.

The bridge and Wilbur Dam Road serve as the only access point to Watauga Dam, Watauga Hydro Plant, Watauga Dam Campground, the Watauga Dam Boat Ramp, and a small community of residences along Lookout Lane and Raven Rock Cove Road. Because TVA operations and residents in surrounding communities rely on the Wilbur Dam Road and bridge to access these areas, TVA must ensure that a bridge is safe and reliable and can serve TVA and the public in the future.

Alternatives

TVA has prepared an environmental assessment (EA) to inform decision makers and the public about the environmental consequences of the Proposed Action. In the EA, incorporated herein by reference, TVA analyzed two alternatives. Under the No Action Alternative, TVA would not build a new bridge, and the existing bridge would remain in place. Its structural issues and uncertainty in the bridge foundations would continue to prevent it from safely carrying all normal highway loads.

Under the Proposed Action Alternative, TVA would replace the existing bridge, Wilbur Reservoir Bridge, with a new concrete bridge aligned on the eastern side of the existing bridge. Based on initial project design, TVA would use five concrete spans (three spans at 110 feet in length and two spans at 85 feet in length) with four piers in the reservoir. The bridge construction would necessitate a slight realignment of Wilbur Dam Road on each side of the reservoir to

accommodate the placement of the new bridge. Therefore, there would be areas of land disturbed from the new alignment on each side of bridge.

Activities would occur within a 13.9-acre Project Area, which would include the Wilbur Reservoir Bridge construction site and three temporary laydown areas in the vicinity of the bridge site to support construction activities (e.g., equipment placement, parking, storage). Laydown area # 1 would be approximately 0.3 acres in size and include a paved parking lot/picnic area known as the Wilbur Reservoir Overlook Area located on the north side of the bridge. This laydown area would be used in initial phases of construction; a portion of the laydown area would be included in the new roadway approach to the bridge. Laydown areas #2 and #3 would be approximately 3.8 acres and 1.1 acres in size, respectively, and would be located on Wilbur Dam Road just south of the bridge site. Grading and approximately 2 acres of tree clearing would be needed to prepare laydown areas #2 and #3; cleared trees and vegetation would be removed by truck for disposal. The Project would avoid removing six trees identified as suitable summer roosting habitat for protected bat species in laydown area #2.

TVA estimates that new bridge construction would take approximately 18 months and demolition of the existing bridge would take approximately two months. After construction and opening of the new bridge, TVA would demolish the existing bridge, thereby minimizing the disruption of travel and access along Wilbur Dam Road.

New bridge construction and bridge demolition would include work in the reservoir. Coordination with TVA's River Management group would be needed to allow for limited times of lowered water elevation during new bridge construction for the drilled shafts and/or during demolition/removal of the existing bridge. During these activities, TVA would draw down Wilbur Reservoir below its normal operating range of 1,644 to 1,648 feet to a reservoir elevation in the mid-1620s (feet) for a brief period (i.e., less than one day). However, for most of the time, TVA would maintain the reservoir water level within Wilbur's normal operating range.

A crane would be used during Project activities, including for placing beams during construction of a new bridge and for disassembling the existing bridge during demolition. When in use, the crane would be situated either on a barge in the reservoir or on either a temporary bulkhead or causeway. If a bulkhead is used, it would be installed along the shoreline of the reservoir. If a causeway it used, it would be installed downstream and parallel to the new bridge alignment. At a minimum, the causeway would extend from one bank across a portion of the reservoir, or at a maximum, it would be constructed to span the full width of the reservoir (bank to bank).

A bulkhead is a platform area created by a retaining wall within the reservoir on one side and soils and fill materials on the other, from which construction materials and equipment may be loaded on to a barge(s). The installation of a bulkhead on the shoreline would involve the temporary placement of fill materials into the reservoir and on the bank of the reservoir adjacent to the bridge location, affecting approximately 0.1 acre. Some grading of the slope may be required to allow crane access.

A causeway is a raised path or road installed across an expanse of low ground, wetlands or water that consists of a crested access platform with embankments on either side. For the Project, construction of a temporary causeway would involve placing clean crushed limestone over culverts within Wilbur Reservoir, on the reservoir bottom. Generally, larger stones form the

causeway base with progressively smaller stone placed and smoothed until the crest is an appropriate driving surface. Culverts would be sized, designed, and distributed throughout the causeway to allow for the reservoir's water flow. Depending on the length of the causeway, culverts would be sized to allow for the passage through the causeway of small recreational watercraft (kayaks, etc.), except during periods of construction activity when watercraft passage would not be permitted near the site to ensure safety. Constructing a causeway that spans across the reservoir, from bank to bank, would require the use of 10,000 cubic yards of stone, affecting approximately 0.32 acres (approximately 13,680 square feet) of the reservoir bottom. Maximum dimensions of a causeway extending across the reservoir, from bank to bank, would be approximately 380 feet in length and 12 feet wide at the top, with 45-degree slopes on the sides.

At the completion of the Project, the bulkhead or the causeway and the barge would be removed from the shore and/or reservoir, and fill materials and/or stone would be moved offsite either for reuse or appropriate disposal. The shoreline would be regraded and reseeded to its original condition.

TVA estimates that bridge demolition would initially involve cutting and removing the concrete decking of the existing bridge. Because lead paint that is present on the steel superstructure of the bridge is considered a hazardous waste, TVA would require that the contractor's demolition plan for removal of the steel superstructure portion of the bridge be done without using explosives to prevent dispersal of lead paint chips into the environment. The steel superstructure of the bridge would be removed by crane and placed on adjacent land. On land, the steel superstructure would be disassembled and transported by truck offsite for appropriate disposal; steel with lead paint would be recycled and therefore would not be managed as a hazardous waste. Finally, the four concrete piers would be demolished down to the mudline of the reservoir (with the use of explosives or other de-construction means) and all debris would be removed from the channel bottom. The demolition plan would be finalized by TVA's construction contractor and would comply with all permits and commitments. Residents would be alerted prior to demolition activities.

During construction, traffic on Wilbur Dam Road would remain open, although it is anticipated that total closures would be short term (less than an hour), with accommodations for emergency vehicles. Single-lane closures are also likely and could last for a longer period (several days or more).

Clearing and/or grading would be needed to stage the laydown areas. After construction and demolition activities are completed, the laydown areas and other disturbed areas would be graded, covered with topsoil, and seeded to establish permanent vegetative cover or otherwise permanently stabilized.

Impacts Assessment

In the EA, TVA identified environmental resources in the Project Area that could be affected by the Proposed Action Alternative, replacement of the bridge. In the EA, TVA analyzed the potential impacts to resources present at the location of the existing bridge and new bridge as well as in areas north and south of the bridgeway that would be affected by the realignment and construction of Wilbur Dam Road as it approaches the new bridge. TVA also reviewed potential

impacts from three construction laydown areas that would be in the vicinity of the bridge location.

TVA analyzed potential impacts to the following environmental resource areas: Surface Water Quality, Wetlands, Floodplains, Terrestrial Ecology (Zoology and Botany), Aquatic Ecology, Threatened and Endangered Species, Cultural Resources (Archaeological and Historic), Managed and Natural Areas, Recreation, Transportation, Noise, Socioeconomics and Environmental Justice, Air quality, and Solid waste. Direct, indirect and cumulative impacts are described.

TVA determined that navigation would not be an issue requiring detailed analysis. TVA consulted with the U.S. Coast Guard, which stated that a bridge permit would not be required for this proposal. There is no commercial traffic on Wilbur Reservoir. Potential impacts to recreation boaters are discussed in the EA Section 3.9 (Recreation).

In Section 3.1.1 of the EA, Surface Water Quality, TVA found that use of a crane and installation and removal of either a temporary pad or bulkhead along the shoreline or a temporary causeway constructed to span up to the width of the reservoir (bank to bank), for construction and demolition purposes, would result in minor temporary disturbance to shoreline soils and sediment on the reservoir bottom. Adherence to terms and conditions of all required federal and state permits, including proper implementation of a Storm Water Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs), is expected to result in only minor temporary impacts to surface waters. These minor temporary impacts are not anticipated to have long term effects on surface water quality and use classifications for Wilbur Reservoir, nor affect the water quality of downstream waters.

No disturbance is proposed to the linear stream feature culverted below Wilbur Dam Road on the south side of the reservoir crossing within the Project Area. The roadbed and stream feature in this location would remain in its current culverted condition. A 50-foot buffer on either side of the naturally flowing (not culverted) portion of this stream feature would be avoided by all construction equipment and activities. TVA would also not impact the ephemeral wet weather conveyance that is located within laydown area #2. The water feature would be flagged and would not be disturbed (e.g., graded, filled, cleared) during construction. BMPs would be applied in the vicinity of the feature to minimize sedimentation.

The Project would likely result in short-term minor impacts to aquatic ecology either directly by the alteration of habitat conditions within Wilbur Reservoir or indirectly due to modification of the riparian zone and storm water runoff resulting from construction and demolition activities. Potential impacts due to construction related disturbance include increased erosion and siltation, loss of instream habitat, and alteration of the Wilbur Reservoir banks and reservoir bottom by heavy equipment and installation and removal of a bulkhead or causeway. As described in Section 3.1.2 (Surface Water Quality) of the EA, to minimize potential impacts in Wilbur Reservoir, appropriate standard BMPs would be implemented during the Project. Therefore, potential impacts to aquatic life would likely be minor.

The Project would not result in impacts to wetlands, as no wetlands currently exist within the Project Area. A small portion of the retaining wall at the south end of the new bridge would be located within the 100-year Watauga River floodplain. The bridge itself would cross the

Watauga River floodplain. The new bridge would have the same number of piers in Wilbur Reservoir as the existing bridge, which would result in negligible changes to flood elevations and therefore be consistent with EO 11988. Consistent with Executive Order 11988, roads and retaining walls for roadways are considered repetitive actions in the 100-year floodplain that should result in only minor impacts. A crane would be used during new bridge construction and to remove the existing bridge steel superstructure during demolition. If the crane is placed on a barge to facilitate construction, the barge would function similarly to a floating dock, which would be considered a repetitive action in the 100-year floodplain that would result in only minor impacts. To minimize adverse impacts, the barge would be anchored to prevent it from floating free during major floods. Alternatively, the crane could be positioned at either a bulkhead or on a causeway. Should a bulkhead or causeway be selected, further floodplain review would be required. To further minimize adverse impacts, the crane would be parked at either of the three laydown areas when not in use. Bridge debris would be hauled off site for disposal at an approved disposal facility that is located outside 100-year floodways. Therefore, the Project would neither significantly impact flood elevations and their natural and beneficial values of floodplains, nor would there be impacts due to flooding.

There would be minor impacts to terrestrial botany from the proposed removal of approximately five acres of forest. The plant communities found in the Project Area are common and well represented throughout the region. Cumulatively, project-related effects to forest resources would be negligible when compared to the total amount (138,000 acres) of forest land occurring in Carter County. Also, project-related work would temporarily affect some herbaceous plant communities, but these areas would likely recover to their pre-project condition in less than one year.

There would be minor impacts to terrestrial zoology as the Project would result in displacement of any wildlife (primarily common, habituated species) currently using the area. Direct effects to some individuals could occur if those individuals are immobile during the time of habitat removal (e.g., during breeding/nesting or hibernation seasons). Habitat removal likely would disperse mobile wildlife into surrounding areas in attempts to find new food resources, shelter, and to reestablish territories. Due to the amount of similarly suitable habitat in areas immediately adjacent to the Project Area, populations of common wildlife species likely would not be impacted by the Project actions. The proposed Project actions are not expected to impact populations of migratory bird species.

Based on analyses in Section 3.6 of the EA, significant impacts to threatened and endangered species would be avoided. With implementation of conservation measures, including avoiding suitable summer roosting habitat identified in laydown area #2, significant impacts to federally listed or protected bat species are not anticipated. Similarly, impacts to three plants of the state special concern, rough avens (*Geum laciniatum*), would be avoided by transplanting them to another appropriate habitat location identified along Wilbur Reservoir. No impacts to aquatic species are anticipated as no listed aquatic species or designated critical habitat is known from the watersheds in the vicinity of the Project Area.

TVA consulted with the State Historic Preservation Officer (SHPO) and federally recognized Indian tribes about the eligibility of Wilbur Reservoir Bridge and three archaeological sites, designated 40CR264, 40CR265, and 40CR266, for listing in the National Register of Historic Places (NRHP), pursuant to 30 CFR 800.5(c). The SHPO responded on May 25, 2023, with

concurrence with TVA's eligibility determination and findings. None of the consulted tribes provided a formal response by the end of comment period. Sites 40CR264 and 40CR265 are ineligible for the NRHP, and 40CR266 should be considered potentially eligible. The existing Wilbur Reservoir Bridge lacks historic, engineering, and architectural significance and does not meet criteria for listing in the NRHP either as an individual resource or as a contributing resource to either the Wilbur Hydroelectric Project or the Watauga Hydroelectric Project, both of which are listed in the NRHP.

TVA would avoid adverse effects to potentially eligible site 40CR266 (a stone feature associated with a dormitory for workers during construction of Watauga Dam) using mitigation measures to ensure the site is not disturbed (Section 2.3 of the EA). The SHPO agreed that the implementation of these measures should avoid any adverse effects on site 40CF266 and none of the tribes objected. Therefore, TVA has fulfilled its responsibilities under Section 106 of the National Historic Preservation Act (NHPA) (16 USC 470).

Impacts to managed and natural areas that overlap the Project Area or are in the vicinity of the Project Area would be short-term and minor due to the temporary nature of the Project. The Project would have short-term, minor impacts to recreational facilities due to noise, single lane closures of Wilbur Dam Road, and the temporary closure of the Wilbur Reservoir Overlook Area. The placement of approaches for the realigned roadway of the new bridge would result in the permanent impact of a reduction in size of the Overlook Area when reopened. While there would be short-term minor impacts to recreational boating and fishing during construction activities, a long-term beneficial impact would result from the new bridge allowing safer, long-term access to the area's recreation sites.

TVA found that there would be short-term minor adverse impacts transportation due to temporary traffic disruptions. However, there would be a long-term beneficial impact from improved safety and reliability of the new bridge. TVA also found that there would be intermittent, moderate to high adverse noise impacts to residences near laydown areas # 2 and #3 and throughout the Project timeline during daytime hours. There would be intermittent, minor noise impacts to TVA's Watauga Dam Campground throughout the Project timeline during daytime hours.

The Project would have a negligible impact on socioeconomics as a temporary increase in construction job opportunities relating to the Project is not likely to contribute significantly toward the economy of the region. There would be short-term minor impacts to nearby communities if haul routes for construction debris utilize surrounding roadways. An environmental justice community in the vicinity of the Project Area would bear greater impacts from transportation, noise, and visual impacts due to their proximity to construction activities. However, these impacts would be temporary, intermittent, and only occur during daytime hours. This community would benefit in the long term from the new bridge.

The Project would result in short-term, minor impacts on air quality from fugitive dust and emissions from equipment and vehicles during construction and demolition activities. Air quality impacts from construction activities would be temporary and would depend on both human factors (e.g., intensity of activity, control measures) and natural factors such as wind speed and direction. However, even under unusually adverse conditions, these emissions from construction activities would have at most, a minor transient impact on air quality and would be

well below the applicable ambient air quality standards. Overall, the potential impacts to air quality from construction-related activities on local and regional air quality would be temporary and minimal.

Construction activities of the replacement bridge would generate relatively small amounts of nonhazardous solid waste. Demolition of the existing bridge would generate greater amounts of solid waste. Generally, demolition of the existing bridge would generate several nonhazardous solid waste streams. Soils, rock, concrete, and other bridge materials would be removed for disposal. Because there is lead paint on the steel superstructure of the bridge, TVA would require that the contractor's demolition plan for removal of the steel superstructure portion of the bridge address the appropriate disposal of the hazardous waste materials to prevent dispersal of lead paint chips into the environment. Overall, adverse direct and indirect impacts on waste management would be minor because hazardous and nonhazardous solid wastes would be managed in accordance with all applicable state and federal regulations.

TVA identified minor to moderate cumulative impacts associated with transportation, water quality, and waste management. While transportation impacts from TVA maintenance activities at Watauga and Wilbur Hydro Plants would be minor, the cumulative impacts if activities are occurring concurrently (in 2025) would be moderate. Wilbur Dam Road and area roadways provide sufficient infrastructure and capacity to accommodate the temporary increases in traffic. TVA is considering conducting aquatic herbicide treatments in areas near the bridge location on Wilbur Reservoir in 2025. If timeframes for the herbicide treatments and the bridge replacement project overlap, there may be an incremental cumulative impact of the Project on reservoir water quality, including within the vicinity of the bridge. Waste management needed to support the construction and demolition activities for the Project would have a cumulative but negligible impact on either of two disposal facilities to which waste generated by the Project is transported.

Public Involvement

On June 23, 2023, TVA issued the draft EA for public review and comment. TVA provided notice of the proposal and the EA to potentially impacted residents, TVA employees, local and regional government officials, and other stakeholders. The availability of the draft EA was announced in local media and a newspaper advertisement in the Elizabethton Star. TVA notified nearby residents by distributing flyers. The draft EA was posted on TVA's website.

TVA held two public meetings at the Watauga Dam Visitor's Center to share information about the project and to solicit comments on the draft EA. There were 17 attendees in total. Comments on the Draft EA were accepted through July 24, 2023. During the 30-day review period, TVA received four comment letters from local residents. TVA's responses to the public comments are included in the Final EA in Appendix E.

Permitting and Consultations

TVA is the lead federal agency in the preparation of this environmental assessment. As described in Section 3.1 of the EA, TVA is required to obtain Clean Water Act (CWA) Section 404 permits from the U.S. Army Corps of Engineers (USACE) for construction of the new footings in the reservoir, bank stabilization associated with the new bridge, removal of the footings for the existing bridge, and temporary impacts associated with the installation of a

bulkhead or causeway for construction and demolition purposes. A Tennessee Department of Environment and Conservation (TDEC) Aquatic Resource Alteration Permit (ARAP) for proposed impacts to the reservoir is also required to satisfy state water regulations and CWA Section 401 water quality certification. TVA has received both the USACE 404 permit and the ARAP for certain activities evaluated under the proposed action alternative. These permits would be amended as necessary to ensure coverage of the final design, pending selection of the action alternative. In addition, coverage under the TDEC Construction Stormwater General Permit would be required since the area of disturbances (including laydown areas) would be greater than one acre.

TVA also consulted with TDEC regarding the potential effects of the Proposed Action on a statelisted plant species, rough avens (*Geum laciniatum*), as described in Section 3.4.1.3 of the EA. TDEC identified a mitigation measure to address these effects (Section 2.3).

The Wilbur Reservoir Bridge is located on public lands managed by TVA as well as the U.S. Forest Service. TVA consulted with the Cherokee National Forest's Watauga/Unaka Ranger District about the Project. Forest officials concluded that the Project would fall outside of the Big Laurel Branch Wilderness boundary, a Congressionally designated wilderness area which is adjacent to the Project Area on the eastern side. Therefore, the Project should have no impacts to National Forest lands. TVA would continue to communicate with the Ranger District on the proposal and planned construction activities.

As described above, TVA consulted with the SHPO and federally recognized Indian tribes about the eligibility of Wilbur Reservoir Bridge and three archaeological sites, designated 40CR264, 40CR265, and 40CR266, for listing in the NRHP, pursuant to 30 CFR 800.5(c). The SHPO responded on May 25, 2023, with concurrence with TVA's eligibility determination and findings. None of the consulted tribes provided a formal response by the end of comment period. TVA has fulfilled its responsibilities under Section 106 of the NHPA.

Mitigation Measures and Environmental Commitments

In addition to the requirements of any necessary permits, which include mitigation measures and best management practices (BMPs), TVA is committed to implementing numerous measures to avoid, minimize, or resolve adverse impacts on the environment. Shoreline stabilization and construction activities would be subject to environmental requirements of the State of Tennessee and applicable regulations. Construction-related BMPs would be critical to ensuring that environmental resources are not affected. BMPs include the appropriate measures to control erosion, stabilize disturbed areas, minimize storm water impacts, reduce sedimentation of stream and/or reservoir waters, and manage construction-related waste in accordance with applicable waste management laws and regulations.

The following mitigation measures were identified by TVA during the environmental review process and would be implemented to mitigate potential adverse effects of the Proposed Action:

• Surface Water Quality / Aquatic Ecology. To avoid impacts to a stream channel located below Wilbur Dam Road on the south side of the reservoir crossing within the Project Area, TVA will require the contractor to maintain a 50-foot buffer on either side of the naturally flowing (not culverted) portion of the stream feature. TVA will avoid impacting

an ephemeral wet weather conveyance within the proposed laydown area #2 by roping the area off; no grading, filling, or clearing would occur within the roped area. For any clearing or grading near the ephemeral stream, TVA will require the use of standard BMPs to prevent sedimentation from entering the ephemeral stream.

- Threatened and Endangered Species (Zoology). TVA will require the construction contractor to avoid removing six trees identified as suitable summer roosting habitat for federally listed bat species. Several activities associated with the proposed project, including tree removal, were addressed in TVA's 2018 programmatic consultation with the U.S. Fish and Wildlife Service on routine actions and federally listed bats in accordance with the Endangered Species Act Section 7(a)(2). For those activities with potential to affect bats, TVA committed to implementing specific conservation measures. These activities and associated conservation measures are identified in the TVA Bat Strategy Project Screening Form (see Appendix C, page 5) and will be reviewed/implemented as part of the Project.
- *Botany*. TVA will physically dig up the three special concern rough avens plants in the Project Area, preferably in the fall, and place them in containers. TVA will then immediately plant them in an appropriate habitat already identified along Wilbur Reservoir.
- Floodplains. If not located on a barge in the reservoir or on a temporary bulkhead along the shoreline, the crane used to demolish the existing bridge would be parked at one of the three laydown areas when not in use. To minimize adverse impacts, the barge would be anchored to prevent it from floating free during major floods. Using a crane on either a bulkhead or on a causeway would result in further floodplain review. Bridge debris would be hauled off site for disposal at an approved disposal facility that is located outside of 100-year floodways.
- Cultural Resources. To avoid adverse effects on the potentially eligible site 40CR266 (a stone feature associated with a dormitory for workers during construction of Watauga Dam), TVA will flag the western portion of the laydown area #3 with high visibility flagging tape prior to construction, recording this as a "sensitive area" on design drawings, and requiring the construction crew to exclude the sensitive area from use. These measures will ensure no vegetation clearing, vehicle use, or ground disturbing activities occur in the sensitive area.
- *Recreation.* TVA will coordinate with Watauga Dam Campground to ensure the potential for recreational impacts are minimized. During construction activities, watercraft passage at the project area would be restricted.
- Air. To minimize fugitive dust mobilization, TVA will require contractors to keep construction equipment properly maintained and to use BMPs (such as covered loads and wet suppression) to prevent the spread of dust, dirt, and debris. These methods may include wetting equipment and laydown areas, covering waste or debris piles, using covered containers to haul waste and debris, and cleaning paved roads, including Wilbur Dam Road, daily until construction and demolition activities are complete.

• TVA will provide periodic updates to residents of the small community on Lookout Lane and Raven Rock Creek Road, and the Watauga Dam Campground. The residents will also be informed prior to demolition activities.

Conclusion and Findings

Based on the findings of the EA, TVA concludes that approval of the Proposed Action would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.

November 13, 2024

Date

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