

## Categorical Exclusion Checklist for Proposed TVA Actions

Categorical Exclusion Number Claimed 49	Organization ID Number	Tracking Number <i>(NEPA Administration Use Only)</i> 41888	
Form Preparer Ruth M Horton	Project Initiator/Manager Bess R Hubbard	Business Unit ED - Economic Development	
Project Title InvestPrep Commerce Park, Christian Co, KY, Spec Bldg			Hydrologic Unit Code
Description of Proposed Action <i>(Include Anticipated Dates of Implementation)</i> For Proposed Action See Attachments and References		<input type="checkbox"/>	Continued on Page 3 <i>(if more than one line)</i>
Initiating TVA Facility or Office		TVA Business Units Involved in Project ED - Economic Development	
Location <i>(City, County, State)</i> For Project Location see Attachments and References			

Parts 1 through 4 verify that there are no extraordinary circumstances associated with this action:

### Part 1. Project Characteristics

Is there evidence that the proposed action...	No	Yes	Commit- ment	Information Source for Insignificance
1. Is major in scope?	X			Horton, Ruth M. 02/04/2020
2. Is part of a larger project proposal involving other TVA actions or other federal agencies?	X			Horton, Ruth M. 02/04/2020
* 3. Involves non-routine mitigation to avoid adverse impacts ?	X		No	Horton, Ruth M. 02/04/2020
4. Is opposed by another federal, state, or local government agency?	X			Horton, Ruth M. 02/04/2020
* 5. Has environmental effects which are controversial?	X			Horton, Ruth M. 02/04/2020
* 6. Is one of many actions that will affect the same resources?	X			Horton, Ruth M. 02/04/2020
7. Involves more than minor amount of land?	X			Horton, Ruth M. 02/04/2020

\*If "yes" is marked for any of the above boxes, consult with NEPA Administration on the suitability of this project for a categorical exclusion.

**Part 2. Natural and Cultural Features Affected**

Would the proposed action...	No	Yes	Permit	Commitment	Information Source for Insignificance
1.Potentially affect endangered, threatened, or special status species?	X		No	No	For comments see attachments
2.Potentially affect historic structures, historic sites, Native American religious or cultural properties, or archaeological sites?		X	No	No	For comments see attachments
3.Potentially take prime or unique farmland out of production?	X		No	No	For comments see attachments
4.Potentially affect Wild and Scenic Rivers or their tributaries?	X		No	No	Horton, Ruth M. 02/04/2020
5.Potentially affect a stream on the Nationwide Rivers Inventory?	X		No	No	Horton, Ruth M. 02/04/2020
6.Potentially affect wetlands?	X		No	No	For comments see attachments
7.Potentially affect water flow, stream banks or stream channels?	X		No	No	Horton, Ruth M. 08/26/2020
8.Potentially affect the 100-year floodplain?		X	No	No	For comments see attachments
9.Potentially affect ecologically critical areas, federal, state, or local park lands, national or state forests, wilderness areas, scenic areas, wildlife management areas, recreational areas, greenways, or trails?	X		No	No	Horton, Ruth M. 02/04/2020
10.Contribute to the spread of exotic or invasive species?	X		No	No	For comments see attachments
11.Potentially affect migratory bird populations?	X		No	No	For comments see attachments
12.Involve water withdrawal of a magnitude that may affect aquatic life or involve interbasin transfer of water?	X		No	No	Horton, Ruth M. 02/04/2020
13.Potentially affect surface water?		X	No	No	For comments see attachments
14.Potentially affect drinking water supply?	X		No	No	Horton, Ruth M. 02/04/2020
15.Potentially affect groundwater?	X		No	No	Horton, Ruth M. 02/04/2020
16.Potentially affect unique or important terrestrial habitat?	X		No	No	For comments see attachments
17.Potentially affect unique or important aquatic habitat?	X		No	No	Horton, Ruth M. 02/04/2020

**Part 3. Potential Pollutant Generation**

Would the proposed action potentially (including accidental or unplanned)...	No	Yes	Permit	Commitment	Information Source for Insignificance
1.Release air pollutants?		X	No	No	For comments see attachments
2.Generate water pollutants?	X		No	No	Horton, Ruth M. 02/04/2020
3.Generate wastewater streams?	X		No	No	Horton, Ruth M. 02/04/2020
4.Cause soil erosion?		X	No	No	For comments see attachments
5.Discharge dredged or fill materials?	X		No	No	Horton, Ruth M. 02/04/2020
6.Generate large amounts of solid waste or waste not ordinarily generated?	X		No	No	Horton, Ruth M. 02/04/2020
7.Generate or release hazardous waste (RCRA)?	X		No	No	Horton, Ruth M. 02/04/2020
8.Generate or release universal or special waste, or used oil?	X		No	No	Horton, Ruth M. 02/04/2020
9.Generate or release toxic substances (CERCLA, TSCA)?	X		No	No	Horton, Ruth M. 02/04/2020
10.Involve materials such as PCBs, solvents, asbestos, sandblasting material, mercury, lead, or paints?	X		No	No	Horton, Ruth M. 02/04/2020
11.Involve disturbance of pre-existing contamination?	X		No	No	Horton, Ruth M. 02/04/2020
12.Generate noise levels with off-site impacts?		X	No	No	For comments see attachments
13.Generate odor with off-site impacts?	X		No	No	Horton, Ruth M. 02/04/2020
14.Produce light which causes disturbance?	X		No	No	Horton, Ruth M. 02/04/2020
15.Release of radioactive materials?	X		No	No	Horton, Ruth M. 02/04/2020
16.Involve underground or above-ground storage tanks or bulk storage?	X		No	No	Horton, Ruth M. 02/04/2020
17.Involve materials that require special handling?	X		No	No	Horton, Ruth M. 02/04/2020

**Part 4. Social and Economic Effects**

Would the proposed action...	No	Yes	Permit	Commitment	Information Source for Insignificance
1.Potentially cause public health effects?	X			No	Horton, Ruth M. 02/04/2020
2.Increase the potential for accidents affecting the public?	X			No	Horton, Ruth M. 02/04/2020
3.Cause the displacement or relocation of businesses, residences, cemeteries, or farms?	X			No	Horton, Ruth M. 02/04/2020
4.Contrast with existing land use, or potentially affect resources described as unique or significant in a federal, state, or local plan?	X			No	For comments see attachments
5.Disproportionately affect minority or low-income populations?	X			No	Horton, Ruth M. 02/04/2020
6.Involve genetically engineered organisms or materials?	X			No	Horton, Ruth M. 02/04/2020
7.Produce visual contrast or visual discord?	X			No	For comments see attachments
8.Potentially interfere with recreational or educational uses?	X			No	Horton, Ruth M. 08/26/2020
9.Potentially interfere with river or other navigation?	X		No	No	Horton, Ruth M. 02/04/2020
10.Potentially generate highway or railroad traffic problems?		X		No	For comments see attachments

**Part 5. Other Environmental Compliance/Reporting Issues**

Would the proposed action...	No	Yes	Commitment	Information Source for Insignificance
1.Release or otherwise use substances on the Toxic Release Inventory list?	X		No	Horton, Ruth M. 02/04/2020
2.Involve a structure taller than 200 feet above ground level?	X		No	Horton, Ruth M. 02/04/2020
3.Involve site-specific chemical traffic control?	X		No	Horton, Ruth M. 02/04/2020
4.Require a site-specific emergency notification process?	X		No	Horton, Ruth M. 02/04/2020
5.Cause a modification to an existing environmental permit or to existing equipment with an environmental permit or involve the installation of new equipment/systems that will require a permit?	X		No	Horton, Ruth M. 02/04/2020
6.Potentially impact operation of the river system or require special water elevations or flow conditions??	X		No	Horton, Ruth M. 02/04/2020
7.Involve construction or lease of a new building or demolition or renovation of existing building (i.e. major changes to lighting, HVAC, and/or structural elements of building of 1000 sq. ft. or more)?	X		No	Horton, Ruth M. 02/04/2020

Parts 1 through 4: If "yes" is checked, describe in the discussion section following this form why the effect is insignificant. Attach any conditions or commitments which will ensure insignificant impacts. Use of non-routine commitments to avoid significance is an indication that consultation with NEPA Administration is needed.

An  EA or  EIS Will be prepared.

Based upon my review of environmental impacts, the discussion attached, and/or consultations with NEPA Administration, I have determined that the above action does not have a significant impact on the quality of the human environment and that no extraordinary circumstances exist. Therefore, this proposal qualifies for a categorical exclusion under Section 5.2. 49 of TVA NEPA Procedures.

Project Initiator/Manager Bess R Hubbard		Date 08/27/2020
TVA Organization ED	E-mail sbrickma@tva.gov	Telephone

**Environmental Concurrence Reviewer**

John Brellenthin 08/27/2020  
\_\_\_\_\_  
Signature

**Preparer Closure**

Ruth M Horton 08/27/20  
\_\_\_\_\_  
Signature

**Other Environmental Concurrence Signatures (as required by your organization)**

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Signature

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Signature

Signature

Signature

**Other Review Signatures** (as required by your organization)

Ruth M Horton 08/27/2020

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Signature

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Signature

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**Attachments/References**

Description of Proposed Action Continued from Page 1

TVA proposes to utilize TVA InvestPrep™ matching funds to assist with the construction of a 100,000 SF speculative building on a 22-acre site. Commerce Park, located in Christian County, Kentucky, was purchased by the Hopkinsville Industrial Foundation in February 1996. The site has been designated as Kentucky Build Ready, meaning that it's met a set of development standards such as appropriate zoning, due diligence studies, and a building pad. In 2008, a 200,000 SF pad-ready site was graded and compacted with 98% proctor and 2" dense graded aggregate, and a pad was constructed. A temporary marketing sign is located on-site, which was paid for in-part by TVA InvestPrep in Round 6 (2018) under an Environmental Evaluation Form that concluded there would be no primary impact to the Environment (CE 5.2.27)..

Project Location Continued from Page 1

Christian County, KY, Commerce Park, Frank Yost Lane and Pembroke Road, Hopkinsville, KY. Site Center Point: Lat 36.801965°/ Long -87.391199. See attached maps.

CEC General Comment Listing

1. See attached project description.  
 By: Ruth M Horton 02/04/2020  
 Files: Project Summary\_Christian County, KY (10.15.19).docx 02/04/2020 116.64 Bytes
2. Commerce Park is located on State Highway 41 approximately 7 miles southeast of downtown Hopkinsville, KY. See attached for location map, aerial photo looking south, ground level photos, area of potential effect (APE) and detailed APE map..  
 By: Ruth M Horton 08/26/2020  
 Files: Location Map\_Christian County, KY.pdf 02/04/2020 1,645.51 Bytes  
 Aerial Photo (Looking South)\_Christian County, KY (June 2019).JPG 02/04/2020 4,025.24 Bytes  
 CommercePark\_GroundLevelPhotos-NESW.pdf 02/04/2020 753.71 Bytes  
 APE Map with Acreages\_Christian County, KY.pdf 02/04/2020 905.65 Bytes
3. TVA proposes to use \$400,000 of TVA InvestPrep funding to match over \$2 Million of non-TVA funding to assist with the construction of a 100,000 square foot (SF) speculative building on 10.4 acres of a 22-acre site. The site is bounded by the 5 -lane U.S. Highway 41, the 2-lane Frank Yost lane, and other tracts within Commerce Park. Access to the site is provided by a gravel road off of Frank Yost Lane. Utilities (water, sewer, natural gas and electric power) have already been extended to the site. For more detail see the attached Project Summary.  
 By: Ruth M Horton 02/04/2020  
 Files: Project Summary\_Christian County, KY (10.15.19).docx 02/04/2020 116.64 Bytes

CEC Comment Listing

Part 2 Comments

1. A number of activities associated with the proposed project were addressed in 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), 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 (attached) and need to be reviewed/implemented as part of the proposed project.  
 By: Sara J McLaughlin-Johnson 03/02/2020  
 Files: COMPLETE\_CEC41888\_EcoDev\_TVA-Bat-Strategy-Form\_2020-03-05.pdf 03/05/2020 46.00 Bytes

1. A review of terrestrial animal species in the TVA Natural Heritage database on December 3, 2019, did not result in records for any state or federally listed species within three miles of the project footprint. Three federally listed species (gray bat, Indiana bat, and northern long-eared bat) have documented presence in Christian County, Kentucky (Table 1. Terrestrial Animal T&E Species). See additional comments for Section 7 ESA compliance regarding impacts to federally listed bats. See attached input for species impact analyses.  
By: Sara J McLaughlin-Johnson 03/02/2020  
Files: InvestPrep\_ChristianCo\_CommercePark\_TerrZoo\_P2Q1.do 03/02/2020 16.59 Bytes  
cx
  2. There are no previously recorded sites mapped within or near the survey area. However, the proposed project is located directly adjacent to a known route of the Trail of Tears. The archaeological survey consisted of approximately 3.61 ha (8.93 acres) of project footprint currently used as agricultural field. The goal of the archaeological work was to determine if cultural deposits associated with the TOT were located within the proposed survey area, as well as to locate previously unrecorded archaeological sites, if present. Field methods consisted of systematic shovel testing and visual inspection with shovel tests placed at 20 m (66 ft) intervals. A metal detector survey was conducted along 5m lanes throughout the project footprint. No archaeological sites were found during the investigation and based on these results, no further archaeological work is recommended.  
  
During the survey, CRA identified a total of three potentially historic structures within the project's viewshed, none of which were previously surveyed. CRA recommends (and TVA concurs) that none of these properties are eligible for listing in the National Register of Historic Places (NRHP). Views to other potentially-historic structures within the half-mile radius were blocked by buildings and/or thick stands of vegetation. Thus, no structures eligible for inclusion in the NRHP will be affected by the proposed project.  
  
Based on this review, TVA finds that the proposed undertaking would result in no effects on historic properties included in, or eligible for inclusion in, the NRHP.  
By: Kerry D Nichols 08/24/2020  
Files: CID 78352\_Christian County\_KY\_8-24-2020.pdf 08/24/2020 12.51 Bytes
  3. The proposed building site is within an existing industrial park which has been cleared and graded. The building pad was graded and compacted in 2008. See aerial photo in attachments.  
By: Ruth M Horton 02/04/2020
  8. Please see attached Word document, also located at \\main.tva.gov\share\rsoe\rg wm-Work-FloodRisk\H & H Impact Reviews and Studies\Reviews Economic Development\2020\  
  
By: Carrie C Williamson 11/25/2019  
Files: 35670 commerce park christian co ky.docx 11/25/2019 1,558.46 Bytes
  10. Based on review of the actions, site location information, maps, and photographs, the proposed project would not contribute to the spread of exotic or invasive terrestrial animal species.  
By: Sara J McLaughlin-Johnson 03/02/2020
  11. No aggregations of migratory birds are known from the project footprint. Suitable foraging or nesting habitat may be present for migratory birds within the project footprint. These individuals could be impacted by the proposed actions if nests are active in the action area at the time proposed project activities are executed. However, similarly suitable habitat is ample across the adjacent landscape such that disturbed/displaced individuals could easily find alternative habitat nearby. Proposed project activities would not impact populations or aggregations of migratory birds.  
By: Sara J McLaughlin-Johnson 03/02/2020
  13. There are no streams, wet weather conveyances or wetlands within the APE. Minor erosion and sedimentation from construction activities could occur. If the project would disturb more than one acre, an approved erosion prevention and sediment control plan would be required by the State of Kentucky prior to any land-disturbing activity on the construction site. Any impacts are expected to be temporary and minor, with the use of construction best management practices (BMPs) in accordance with state and federal requirements.  
By: Ruth M Horton 02/04/2020
  16. No caves are known within three miles of the project footprint and known cave habitat would not be impacted by proposed activities. No additional unique or important terrestrial habitats are known from the project footprint. Proposed project activities would not affect unique or important terrestrial habitats.  
By: Sara J McLaughlin-Johnson 03/02/2020
  6. The site has been entirely cleared and compacted.. Per the attached map there are no NWI wetlands present.  
By: Ruth M Horton 02/04/2020
- Part 3 Comments
1. The equipment required to support the construction of this project is expected to be both gasoline and diesel powered, and emit the air pollutants normally associated with mobile fossil fuel powered equipment. All diesel equipment would use low sulfur fuel and are expected to be equipped with all required pollution controls. The increase in emissions from the equipment would be temporary and within the normal daily variation of mobile emissions from a construction site.  
By: Ruth M Horton 02/04/2020
  4. The small amounts of soil erosion may be expected during construction would be controlled using BMPs installed per state standards. However, since construction will occur on a prepared building pad, impacts would be small, minor and temporary.  
By: Ruth M Horton 02/04/2020
  12. The proposed construction site is within an existing industrial park. Noise from construction activity would be expected to be minor and temporary and within the normal noise level expected in a developing industrial park.

By: Ruth M Horton

02/04/2020

Part 4 Comments

4. The proposed speculative building would be in an existing industrial park on a site that has been designated as Kentucky Build Ready program.  
By: Ruth M Horton 02/04/2020
7. Commerce park is zoned I-2 - Heavy Industrial. The 250 ft X 400 ft, 35 ft high building would be similar to existing buildings in the industrial park.  
By: Ruth M Horton 02/04/2020
10. The increase in vehicle traffic due to construction of the building may cause temporary congestion at the site entrance. Such congestion should be of short duration and limited to those times of the day when construction workers arrive and leave the site or when materials and supplies are delivered.  
By: Ruth M Horton 02/04/2020

CEC Permit Listing

CEC Commitment Listing