

**Attachment D – TVA Notice to Hold Open House on November 13,
2008, and Public Comments with TVA Responses on the Draft
Environmental Assessment**

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TVA to Hold Open House on Request to Use Property for Substation

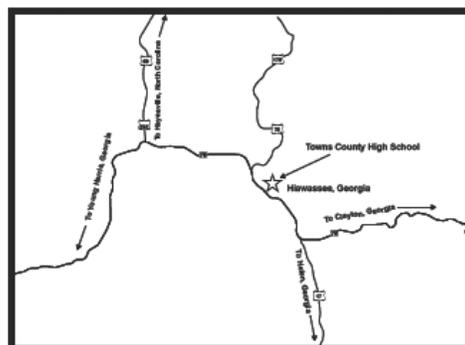
HIAWASSEE, Ga. – TVA will hold an open house public meeting Thursday, November 13, to receive public comments on a proposal by Blue Ridge Mountain Electric Membership Corporation (BRMEMC) to use 1.6 acres of TVA-managed land for construction of a substation and transmission line.

The meeting will be held from 4 p.m. to 8 p.m. at the Towns County High School cafeteria, 1400 Highway 76, in Hiawassee. The public is welcome to come anytime between those hours and discuss the proposal.

TVA has extended the comment period through November 24 in response to public comments received during a 30-day public comment period in May. Comments received during the recent Mountain Reservoirs' Land Management Plan Public Meeting held on August 27th pertaining to BRMEMC's proposed use of Parcel 52 will be considered in the review of the substation project. The public may review the draft environmental assessment at www.tva.com/environment/reports/BRMEMC_Substation/.

The property is located on Chatuge Reservoir on U.S. Highway 76 south of Hiawassee in Towns County.

TVA is interested in public comments on the potential of the proposed project to affect the environment and historic properties. TVA is also asking the public to identify any other issues associated with the proposal. Comments will be used to help TVA reach a decision on the use of the property.



Comments can be made at the public meeting, on the TVA website listed above, calling 866-601-4612, or by writing TVA c/o "BRMEMC Substation Proposal", Chickamauga — Hiawassee Watershed Team, 4800 US Highway 64 West, Suite 102, Murphy, North Carolina 28906. All comments must be received on or before November 24, 2008.

TVA is the nation's largest public power provider and is completely self-financing. TVA provides power to large industries and 159 power distributors that serve approximately 8.8 million consumers in seven southeastern states. TVA also manages the Tennessee River and its tributaries to provide multiple benefits, including flood damage reduction, navigation, water quality and recreation.

Public Open House

November 13, 2008, 4:00 p.m.-8:00 p.m. EDT.
Towns County High School Cafeteria
1400 U.S. Hwy 76 E
Hiawassee, GA 30546

Any comments received, including names and addresses, will become part of the administrative record and will be available for public inspection.



TVA has considered all the substantive comments it received on the draft EA and either has responded to them as set forth below and/or modified the text of the EA as appropriate. Because many of the comments made the same point or raised the same concern, TVA has tried to group similar comments and has provided one response for each grouping. In doing this, TVA has used the actual comments or parts of comments it received. Consequently, there may be parts of grouped specific comments that are not fully addressed by the group response. However, TVA believes that all of the important issues and concerns raised by grouped commenters are addressed either in other responses or by the EA analysis.

In Support of Proposal

Build your kids a swing at home or go to the rec. We need power. **(Comment by: Unknown)**

I am very concerned about this sight. It is a ideal spot for the substation. No matter where you put a sub-station some one will complain. Most of the time it about a dozen people. All of those complaining are people that move in here from another state or long distance away. Most of all local citizen are in favor of this spot. I have no problem with this sight, it a ideal spot for sub-station. **(Comment by: Garry Denton)**

As a concerned citizen of Towns County and an EMC employee, I sincerely understand the need for the sub-station. I also understand that this objection to the sight is nothing ore than a political plot to hinder anything constructive for the EMC. The homeowners Association is spreading limited facts and a lot of non truths. I don't think they really understand or care that there is a true need for this project. Thanks for all that you TVA does and has done for rural North Georgia. **(Comment by: Brad Wilson)**

My name is Gwen Risky, I live in the fodder circle community. The new substation will effect me and many of my friends and neighbors. I believe the benefit of this station more than outweighs the cons of not going through with it. The prospective site is a good location to serve BRMEMC customers easily accessed and will keep cost down for all. **(Comment by: Gwen Risky)**

I live in Hiwassee, Georgia. I am calling to say that I am in favor of Blue Ridge EMC substation going on Parcel 52. I think it is a good idea and it will not detract from anything that is over there. **(Comment by: Ms. Logan)**

TVA Response: These comments have been reviewed and noted.

Opposed to the Proposal

After reading the Draft EA and attending the two public meetings, we remain steadfastly opposed to the proposal to allow BRMEMC to build a power substation on TVA Parcel 52. We join thousands of our fellow Towns County citizens, organizations and local government officials in this request for TVA to act responsibly by denying the BRMEMC proposal. **(Comment by: Lindsey and Mark Fitzgerald)**

Please do not sell Parcel 52 to Blue Ridge Mountain EMC. **(Comment by: Elizabeth H. Ruf)**

This industrial use does not belong on our beautiful lakefront. **(Comment by: Amy B. Black)**

I am totally against any commercial bldg of any description built on the shores of Lake Chatuge. I think serious consideration should be taken in locating another more inland sight. Even a tax referendum should be put to vote. All the opposition reasons are quite publicly known. Therefore, I vote NO on the substation. **(Comment by: Gene Hewatt)**

NO to Parcel 52 for a substation! **(Comment by: Hilda R. McGriff)**

As a permanent resident of Hiawassee, I wish to go on record as totally opposing the use of parcel 52 as a substation site for BRMEMC. **(Comment by: Alton Higgins)**

I met with Joe Satterfield, a rep. from TVA, Commissioner Kendal, TLHA Rep. and discussed many aspects of both the selection of the site and the route of the 69,000 volt lines. While I heard and understand all arguments, I still disagree with the selection of site 52. **(Comment by: Alton Higgins)**

Please DO NOT sell any of this parcel 52 to BRMEMC. Please add my name to those who are VERY OPPOSED to the building of a BRMEMC substation on any portion of Parcel 52. **(Comment by: Madeline Botting)**

I feel parcel # 52 is not the proper choice. It is not aesthetically pleasing view for visitors to our town to see a substation at that location. Also, it is not proper to locate such a facility near water and it is not the best use of such a beautiful parcel for sub station! Parcel #52 with a substation would be a health hazard to adjacent homeowners. **(Comment by: Susan L. Sulleye)**

I object to locating an electrical substation on parcel 52. **(Comment by: William Swett)**

This letter is to document my strong opposition to the plan to build a power substation on TVA parcel 52 in Hiawassee Georgia. **(Comment by: Joseph Ruf)**

Towns County citizens and leadership have voiced almost unanimous opposition to this proposal. The TVA's own Draft EA features pages and pages of comments against this proposal. Petitions were submitted to TVA during the previous comment period listing signatures representing more than 1,000 citizens opposed to using Parcel 52 for the purpose of a power substation. Hundreds of Towns County citizens have participated in public meetings concerning this proposal with nearly unanimous opposition. We are aware that TVA is not holding a popular vote to determine the outcome; instead there is a sole decision maker Tom Kilgore. **(Comment by: Lindey and Mark Fitzgerald)**

A NO ACTION ALTERNATIVE should be the decision by TVA. **(Comment by: Robert Keys)**

Please count me as one who is strongly opposed to the use of parcel 52 in Hiawassee, GA for a substation. I don't think you are doing any good offering this parcel (selling) to BRMEMC, and I suspect that BRMEMC will rue the day they took your offer. You have created a huge wave of negative public opinion, and I suspect will only grow. And your "above it all" attitude only adds fire to the furor. **(Comment by: Don Miller)**

My wife and I are opposed to TVA allowing BRMEMC to obtain any portion of Parcel 52 for a substation. We do understand that a substation is needed in the eastern and southern part of Towns County. **(Comment by: Robert Keys)**

I and many other citizens of Towns County, would greatly appreciate your careful consideration of the issues surrounding the BRMEMC request to construct a sub station in the flood plain of Parcel 52. It is hoped the action of the TVA Board will be to disapprove the BRMEMC application to use any portion of Parcel 52 for reclassification to "Industrial" and then build an industrial power sub station. **(Comment by: Wesley Lerdon)**

I have enjoyed working with Anda Ray on this sub station project in Hiawassee. She has been very professional in our discussions, and I really appreciate her efforts to try and communicate with me in a very difficult situation. Tricia and I wanted it to go on record that we strongly oppose the substation that is being proposed on Lake Chatuge. **(Comment by: Wesley Lerdon)**

My wife and I are opposed to TVA allowing BRMEMC to obtain any portion of Parcel 52 for a substation. We do understand that a substation is needed in the eastern and southern part of Towns County. **(Comment by: Robert Keys)**

I and many other citizens of Towns County, would greatly appreciate your careful consideration of the issues surrounding the BRMEMC request to construct a sub station in the flood plain of Parcel 52. It is hoped the action of the TVA Board will be to disapprove the BRMEMC application to use any portion of Parcel 52 for reclassification to "Industrial" and then build an industrial power sub station. **(Comment by: Barry V. White)**

How would you like to have your life earnings tied up in real estate on the lake and lose the value of your homes because of a project like this? There are other options that must be considered. Please do not designate this piece of property for this horrible use. **(Comment by: Barry V. White)**

I know you are aware of the information below. I like what you have developed here. It is a very high standard to hold you to, and in cases like this, it never hurts to review it again. TVA's Mission and Values - TVA Mission: Serving the Valley through Energy, Environment, and Economic Development. Our Values: Integrity - *We do what we say we will do.* You have done this thus far and I appreciate it. *Our actions, our words are consistent, honest, and ethical. We work to earn each other's trust. Respect - We value everyone and everyone's work. We treat each other with respect and dignity. We assume innocence. Accountability - We are serious about safety.* They are proposing a park on this property next to the sub station which makes no sense at all to me. I am a father of 4 boys and they would not play in a park next to a substation. *We work on the right things. We are accountable for results. We follow the rules. We use TVA resources wisely. Teamwork - We collaborate. We strive for engagement.* Thanks to some of us, I believe we have had plenty of engagement. *We interact through rapport. We play on a bigger TVA team. Continuous Improvement - We set high standards and goals based on external benchmarks. We are self-critical. We seek new ideas. We investigate and solve problems. We learn from our mistakes.* Let's solve this problem and make a decision that is consistent with all your mission statement. Honest Communication - *We listen to understand. We speak to be understood. We give and receive meaningful feedback. We seek other opinions. We value different perspectives. Flexibility - We welcome and adapt to change. We respond quickly to customer needs.* **(Comment by: Barry V. White)**

The undersigned support of the retention of the present status of all Parcel 52 on Lake Chatuge with no part being used as a substation by the Blue Ridge Mountain EMC. **(Comment by: Petition signed by 592 stakeholders)**

TVA Response: These comments have been reviewed and noted.

We compete against every other N. GA Lake County. This proposal will hurt our competitiveness to a huge degree. TVA and EMC do NOT really understand the value of the lake. This decision is being driven by engineers instead of by sensitive marketing oriented managers that understand MACRO economics. I'm, for the first time in my life, ashamed of the TVA and the EMC. I always thought your mission included helping the local communities in other ways than just supply electricity. **(Comment by: Joe Ruf)**

TCHA recognizes that there is a special relationship between TVA and BRMEMC in that they are a customer to whom TVA supplies its power product. But TVA should remember that the citizens of Towns County are the customer base of BRMEMC and, by definition, the real customers of TVA. We buy the TVA power through BRMEMC and thus pay your bills. And we are unhappy when we see TVA favor an agent while ignoring those who pay the bill. This goes not only to the comments above but also to the favoritism allowed BRMEMC by waiving the 1933 limitation. **(Comment by: The Towns County Homeowners Association)**

TVA Response: TVA does work closely with distributors of TVA power, like BRMEMC, to ensure that electricity service to the public is reliable and affordable. BRMEMC's request here supports both of these goals. This does not mean, however, that TVA has not given careful consideration to issues and information brought forward by opponents of the proposal. Nor does it mean that TVA would approve the request if environmental impacts were deemed unacceptable.

Furthermore, TVA is developing a Mountain Reservoirs Land Management Plan (Plan) to guide land use and resource management decisions concerning TVA-managed public lands located along nine mountain reservoirs: Apalachia, Blue Ridge, Chatuge, Fontana, Hiwassee, Nottely, Ocoee 1 (Parksville), Ocoee 2, and Ocoee 3. In the planning process, TVA will identify the most suitable and appropriate use for each parcel of TVA-managed public land along these reservoirs for the next 10 years.

I understand that w/o electricity we would still be in the dark ages. However, I want Towns County to remain a small mountain community! Look at what progress has done to Atlanta, more people, more pollution, more crime, more traffic, more accidents, more disease, more stress. **(Comment by: Steve and Suzan Wise)**

The proposed substation is environmentally irresponsible as it surely will ultimately destroy the quality of the lake and its environment. We are very disappointed that our BRMEMC has so little regard for the area it serves. **(Comment by: Barbara and David Hansen)**

I strongly oppose the proposed action to allow industrialization of lakefront property, specifically the industrial/substation use of parcel 52. This would be neither environmentally desirable property management nor good stewardship of our natural resources by TVA. **(Comment by: Don Berry)**

Please honor your responsibility to the public; “Serving the Valley through Energy, Environment, and Economic Development. This proposal is not good for two of the three reasons you state in your mission. Let’s find an alternative that fulfills the entire mission below, not just one-third of it. (**Comment by:** *Barry V. White*)

The rightful association of the TVA to electric power distribution organizations, such as the BRMEMC, is to make power available to the distributors, not broker land deals strongly opposed by large numbers of citizens. For the TVA to support the BRMEMC application would end 70 years of conscientious TVA land stewardship in Towns County. (**Comment by:** *Wesley Lerdon*)

TVA Response: TVA has a broad regional resource development mission, which calls for integration of conservation and recreation objectives with economic development objectives. TVA recognizes the importance of striking a balance among the competing demands placed on the land and water resources. TVA has evaluated this proposal on its own merits. This evaluation included an assessment of the impacts of the proposal on the environment and TVA has determined that the proposed use of part of Parcel 52 for a substation and connected transmission lines would not have unacceptable environmental impacts.

Alternative Locations for the Substation

With the rapid growth of Towns County, both along GA 75 and GA 76, It would seem more logical to select a site further out either highway - It could feed both back toward Hiawassee and into the future growth areas. (Joe admitted that their plan did not go beyond 20 years.) Anyone who has lived here any time know that the demographic of this area changes practically every few years. (**Comment by:** *Alton Higgins*)

I know that there is a need for additional electrical distribution on the south or east side of Hiawassee and it is always not in my back yard. I would like to see an alternate site even though the cost may be more. As you know the consumer will always be responsible for paying for it. I am not concerned with the EMF having been in the electrical supply business for 40 or more years. (**Comment by:** *Perry Bush*)

BRMEMC states widely that the Parcel 52 package is the best business deal for them. Translating that, “best business deal” means lowest cost. But, best business deal for BRMEMC does not mean best business deal for Towns County. Years ago, the Federal government learned that buying the lowest cost proposal did not always mean they got what was best for the government. So they went to a procedure called ‘Best Value’ in which cost was a significant factor but not THE controlling factor. Putting the substation, which we all agree is needed, on Parcel 52 does not represent the best value for Towns County and its citizens. TVA needs to respect that and recommend that BRMEMC look elsewhere. (**Comment by:** *The Towns County Homeowners Association*)

BRMEMC claims that this is the ‘best business deal’. That is not true. The ‘best business deal’ is the one that serves both BRMEMC and the County. The County is telling you that this is not the case here. Joe Satterfield has told several of our members that, if TVA does not approve Parcel 52, BRMEMC will have to look elsewhere. TVA needs to adopt the No Action alternative and Joe needs to look elsewhere a little harder. With the current business climate being what it is, he has time. And, with the help of the County, a suitable

result is possible. The 'best business deal' is one that serves the interests of both BRMEMC and the County. (**Comment by:** *The Towns County Homeowners Association*)

There are many other options that could be considered, but to use a prime piece of real estate on the lake for this type of use is not wise. We have a beautiful lake and a quaint little town. I know TVA tries to protect the land and the lakes in the areas where you have property and this decision is not consistent with TVA desires in this area. (**Comment by:** *Barry V. White*)

Is industrial/substation use of this beautiful lakeshore property really the best use for this parcel? I know that we need a new substation in this area of Towns County, but surely BRMEMC can find another parcel in the area that would be just as suitable (albeit perhaps more costly to build on) without destroying lakefront property. Surely most residents would be willing to pay a little more for electricity to retain our beautiful environment. (**Comment by:** *Don Berry*)

The BRMEMC has a legitimate need for a substation to serve the south and eastern parts of our county BUT this industrial eyesore does not belong on the beautiful shoreline of Lake Chatuge. We are confident BRMEMC can be better stewards of our environment by selecting land with less environmental impact. Upon assessing the map displayed at the Towns County High School, we would suggest the possibility considering Parcels 1-2-3 or 6 as a more reasonable alternative site. (**Comment by:** *James and Kathleen Hancock*)

There is very little lakefront that is suitable for recreation. The substation on the lake makes no sense, when in the same vicinity land is available off the lake. I suggest one of the sites off the lake be utilized for the substation. It does not cost that much more than the one on the lake. My suggestion #2 first # 7 second #1 third. (**Comment by:** *M.B. DuBose*)

There are better choices - sites # 1-2-3 or 6 would be more hidden areas instead of spoiling the majestic view of lake. Reconsider the environment impact on the lake and the decrease in property values this would incur. (**Comment by:** *Kathleen and James Hancock*)

TVA Response: TVA has a broad regional resource development mission, which calls for integration of conservation and recreation objectives with economic development objectives. TVA recognizes the importance of striking a balance among the competing demands placed on the land and water resources. TVA has evaluated this proposal on its own merits. This evaluation included an assessment of the impacts of the proposal on the environment and consideration of alternative sites.

Prior to submitting this request to TVA, BRMEMC evaluated seven possible substation locations. BRMEMC chose Site 5 on Parcel 52 as the preferred location because the substation would be near existing transmission lines and BRMEMC's load center. A brief discussion of each alternative substation location and transmission line route has been added to the Substation Locations and Transmission Line Routes section of the final EA and TVA explains why it concurs with BRMEMC's decision in that section and in its discussion of the Preferred Site Identification.

Potential environmental impacts and the possible impact on property values are discussed in the EA.

It has also been indicated at this meeting that if it was a matter of a few hundred thousand dollars, to select a different site, that money could be raised locally! (**Comment by:** *Alton Higgins*)

TVA should do the RIGHT thing not the EASY thing. Because of the current economic climate, time is no longer a pressing factor. TVA should require further due diligence by BRMEMC in cost analysis and site evaluations. (**Comment by:** *Lindey and Mark Fitzgerald*)

Pages 6-9 – Site Evaluation. This section and its conclusion is devoid of any substantial detail or comparative analysis. BRMEMC simply stated the alternatives are too hard to use or too expensive. But it seems clear that they have spent all their planning time on the 52 site and are simply waiving their arms at the others. No serious analysis of alternatives is presented and no cost benefit analysis which would take into consideration the needs and requirements of the county and its development is offered. No detail is provided in the DEA and we suspect that is because no detail was used by TVA thus making these cost comparisons highly suspect. For example, what makes the cost of Site 7 financially unfeasible, \$1.0m? This number itself is suspect. We have noted above that the Parcel 52 cost numbers are suspect possibly by as much as \$200+k. This, combined with a more realistic valuation of the proposed sale price of Parcel 52 brings the difference very close together. It also brings the two other potential sites into play. (**Comment by:** *The Towns County Homeowners Association*)

Even so, by our calculations, if these costs were to be factual, when spread over the customer base for the accounting period likely involved, the increase would be inconsequential to our monthly bills, a few cents vs. the 20% increase just imposed by TVA upon us your real customers. It is clear to us that no real effort was made to analyze and develop alternative sites. For this reason alone, the DEA is worthless and the proposal should be placed in the No Action category. (**Comment by:** *The Towns County Homeowners Association*)

A further comment on the BRMEMC use of cost numbers is warranted. BRMEMC has told TCHA in discussions with us that moving further south would cost \$1.0m per mile for every mile past Parcel 52. Later they have used the number of \$800k per mile. But their March 18, 2008 presentation presents a transmission line cost of \$570k per mile. What is the true cost? TVA has not questioned this issue and should do so. These gross discrepancies call into question the validity of the TVA proposed Action Alternative and whether TVA has done the required homework here. (**Comment by:** *The Towns County Homeowners Association*)

I have written before stating my opposition to parcel 52 on Lake Chatuge being used as a substation for BRMEMC. I would now like to reiterate my opposition. BRMEMC has not used due diligence in seeking an alternative site for this facility, even though opposition is growing in the area. Selling this property for the disclosed price of around \$165,000 just does not seem right. (**Comment by:** *Mike Brock*)

TVA has allowed BRMEMC to posit a “no practicable alternative” cost rationale in favor of Parcel 52 on the basis of presenting no substantial data or alternative cost comparisons in

the DEA. It was only in the 13 November Open House that TCHA was able to see some cost comparison data. These showed 4 possible alternative sites including Parcel 52 which was cheapest by roughly \$1.0m while the others are grouped at plus \$1.0m over Parcel 52. Discussions with BRMEMC reveal that, while the land costs are fairly true (we have comments on the projected Parcel 52 costs below), the site prep costs are “back of the envelop” at best. In fact, TCHA analysis of the Parcel 52 site prep costs have uncovered a large discrepancy in the projected costs of filling the property to the 1933 line, possibly in the \$2-300k range. This analysis was done using the data provided in the DEA but TVA never found it. It is clear that these cost comparisons have not been thoroughly vetted. No detailed trade offs or cost-benefit analyses are presented. TVA has allowed BRMEMC to simply state that moving further south and out of town would be more costly because of increased land and transmission line cost. But, once again, BRMEMC fails to account for the shorter line distance to their customers that moving closer to them would allow. They also fail to account for the fact that the increased cost, when spread over time and their customer base, would be minimal. TVA should require that the real cost trade offs be done and presented to them and the public. This project involves major funding and should not be initiated of such sloppy pre-decision analysis. **(Comment by: The Towns County Homeowners Association)**

I feel Parcel 52 is too beautiful to be used as a substation - I support use for recreation. Certainly another piece can be purchased at valuable cost for BRMEMC use. Even if another piece is a little more expensive, by the time you count the additional cost over 20-30 years and the numbers of customers - It will be pennies/month of additional cost. **(Comment by: Sal Aparo)**

Why put this power substation on the main drive into one beautiful area? One things for sure - If Joe Satterfield lived across the lake from Parcel 52 this TVA open house wouldn't even be occurring. **(Comment by: Madeline Botting)**

As we have noted above, these facilities are at best, ugly and need to be located carefully away from the road and as much as possible out of sight to lower their 'scenic' impact. An example of where BRMEMC has achieved this is the Young Harris substation. The opposite example is the new Hayesville station although it is located in a purely commercial area with little exposure to residential areas. **(Comment by: The Towns County Homeowners Association)**

The following numbered facts I regard important to your Board's factual evaluation of the TVA DEA of Parcel 52 BRMEMC request to build a power sub station. The application of the BRMEMC should be turned down 1. Secluded and concealed properties are available to the BRMEMC for development of a needed substation to support improved power distribution in eastern Towns County. **(Comment by: Wesley Lerdon)**

A drainage permit, and plans are required by Georgia, but not mentioned in the TVA materials or costs. 8. Due diligence has not been exhibited by BRMEMC on Parcel 52, as required to include public access to detailed project data, trade off studies, costs and other facts for public review. The BRMEMC should heed the TCHA's revised fill costs above, for example, to avoid overruns of their quantities and costs for Parcel 52 and furnish, with Due Diligence, complete data for public review of any alternate sites in event their subject application for Parcel 52 is disapproved. **(Comment by: Wesley Lerdon)**

I understand Joe Satterfield told the newspapers that “tract 52 is not in anyone’s backyard”. He told me when he walked out on my porch that our side of the lake had never been considered. There are other viable options that should be pursued. The price goes up but we calculated the amount of money over the next 30 years it would take to fund a one million dollar project like this and it comes out to be pennies per month to the customers on BRMEMC. (**Comment by:** *Barry V. White*)

This additional fill alone would cost approximately \$151,750 adding to the cost not shown by TVA or BRMEMC in their cost analysis. Due diligence is very lacking on the part of both parties in what is being provided to the public. There are other alternatives for BRMEMC to consider but they have done little due diligence on these properties given the sweet deal TVA is apparently wanting to give them. (**Comment by:** *Robert Keys*)

While we understand the need for another substation we feel that preferred site #4 (BRMEMC) would have much less negative impact for our community. Over the life of the substation, the increased cost of preferred site #4 over site # 5, spread over the co-op membership would be of little consequence. All that being said - Site #3, which was your original 1st choice is also in our opinion the best and could be obtained by eminent domain. Note: We believe that there should be a moratorium on the sale of any TVA property for development until the lake is once again clean and healthy. (**Comment by:** *Cheryl and Robert Gehring*)

TVA Response: Prior to submitting this request to TVA, BRMEMC evaluated seven possible substation locations. Five were located on private property, and two were on TVA property. Some of the private property owners would not sell and/or subdivide their property for partial sale. The remaining sites would require extensive site preparation to construct the substation. The site preparation along with the cost of acquiring the property would not be financially desirable for BRMEMC or its customers.

BRMEMC provided TVA with construction cost estimates for all seven possible substation locations. The construction cost estimates for each possible substation location included the cost of acquiring the property, site preparation, fencing, and new transmission lines. The construction cost estimate for Site 5 on Parcel 52 is significantly lower than the other possible locations. The EA has been revised to include more information about costs. Cost per mile for TL construction is dependent on many factors: voltage level, type of structures (poles, towers, etc.), land cost, terrain (mountainous, level, wooded, urban), environment issues, length of line, etc. On average, a 69-kV pole construction on a five-mile TL segment would cost TVA approximately \$500,000 per mile. BRMEMC’s range of costs for TL improvements is approximately \$550,000 per mile. These costs are consistent with such improvements in the industry generally.

TVA agrees that the impact of these costs on BRMEMC’s customers would be ameliorated by spreading them out over time (depreciating). This does not make these cost comparisons invalid or unimportant, however. There is significant pressure for a number reasons on maintaining the affordability of electricity rates charged by BRMEMC (and by TVA). TVA does not agree that it is appropriate to ignore cost differentials merely because they would have a small impact on monthly bills.

TVA has determined that BRMEMC's estimate of the amount of fill needed to get all parts of Site 5 above elevation 1,933.0 is reasonable. A very small portion of the property is below the 100-year flood elevation, and BRMEMC plans to place 21 cubic yards of fill material to elevate that portion of the building site to 1,933.0. Another small portion of the property is below the 500-year flood elevation, and BRMEMC plans to place 0.2 acre-foot of fill material to elevate that small portion of the building site to 1,933.0. The assumptions made by commenters that extensive filling would be necessary to get above the 100- and 500-year flood elevations are incorrect.

BRMEMC and (and TVA) have not worked actively with the county on the search for alternative locations. The county has many tools for use in finding an alternative location and has offered to lead an effort to find a suitable alternative. TVA needs to encourage the two to get together to solve the location problem and can force them to do so if necessary by denying the BRMEMC application. (**Comment by:** *The Towns County Homeowners Association*)

This issue has struck a sensitive cord in the Towns County area. The decision destroys the ambiance of the lake, and from my viewpoint compromises your mission substantially, and it does not have to. We are asking you to tell Blue Ridge EMC to find another spot to put this station. We are all actively seeking alternate pieces of property, and I feel confident we can find another option off the lake in an area that will be best for all involved. We need you to encourage the EMC to be open to finding another location. (**Comment by:** *Barry V. White*)

TVA Response: In response to these requests, TVA did ask BRMEMC to meet with and work with opponents of the proposal to identify additional sites that could meet its needs. BRMEMC did this. BRMEMC reports that none of the additional locations were feasible for various reasons including the size of sites.

Floodplains

The Draft EA glosses over the fact that TVA is disregarding its own rule concerning permanent structure or fill on land below the 1933 line. Homeowners on Lake Chatuge are forced to abide by this rule to protect the integrity of the lake and the surrounding land. TVA should not ignore the rule for BRMEMC. (**Comment by:** *Lindey and Mark Fitzgerald*)

CEC Part 1 item #13 - "Potentially affect drinking water supply?" The only intake for the Towns County Water Authority, and City of Hiawassee is only 4/10 mile downstream, from Parcel 52. This could be fouled by the BRMEMC proposed sub station landfill and construction below the previously TVA enforced "no land fill no construction below 1933 elevation" which is classified as "full capacity" of the reservoir. (**Comment by:** *The Towns County Homeowners Association*)

It has been the experience of a number of our members who own lakeshore properties that the 1933 'full capacity' line is to be held inviolate. This limitation was demonstrated in the 60's as two feet over the height of the floodgates on the Chatuge dam. It is neither the 100 year or 500 year flood height but a potential flood level that could occur anytime. Activities below that elevation are intensely scrutinized by TVA and structures proposed to be placed below that line categorically denied. Yet, in this case, the 1933 limitation is waived in favor of an industrial structure of great weight which, if flooded, could become a serious hazard.

What is good for the goose is good for the gander. BRMEMC is entitled to no more nor less consideration than the private citizen. The 1933 rule is enough on its own to deny the application. (**Comment by:** *The Towns County Homeowners Association*)

Page 12 – Construction in the Flood Plain – This violates TVA rules. If a private property owner cannot build below the 1933 line, even a TVA favorite cannot either. This alone dictates a No Action decision. TVA has violated their own rules regarding building and/or filling below the 1933 line. (**Comment by:** *The Towns County Homeowners Association*)

Further, I feel that TVA would be hypocritical in allowing BRMEMC to modify land that is clearly below the 1933 elevation while disallowing homeowners to do the same. TVA would be neither following nor enforcing its own rules! (**Comment by:** *Don Berry*)

Parcel 52 lies below the 1933 "full capacity" elevation of the Chatuge reservoir, enforced by the TVA for some 70 years, forbidding both "landfill and construction" in such locations along the shores of Lake Chatuge. (**Comment by:** *Wesley Lerdon*)

The TVA has rules concerning the use of lakefront land on Lake Chatuge. All homeowners and businesses abide by those rules to maintain the beauty and health of the lake and shoreline. This parcel of land sits almost entirely below the 1933 flood line where TVA rules do not allow permanent structures to be built. Why is the TVA willing to bend its rule to allow the construction of an electrical power station on land that could be underwater? (**Comment by:** *Barry V. White*)

TVA, by approving this request, will violate its own principle of sound lakeshore management. (**Comment by:** *The Towns County Homeowners Association*)

TO ALLOW FILL ON THIS PARCEL BELOW THE 1933 VIOLATES YOUR OWN RULES OF NOT ALLOWING ANY FILL BELOW THIS SUBJECT LEVEL AND YOU HAVE HELD OTHER LAND OWNERS TO THIS REGULATION. (**Comment by:** *Robert Keys*)

TVA Response: When purchasing and retaining flowage easement rights around reservoirs, in addition to retaining the rights to flood the property, TVA often placed a restriction within flowage easement documents to remove habitable structures or fill material placed on the private property below a certain contour. This contour is most often the maximum shoreline contour (msc) of the reservoir. For Chatuge Reservoir, the msc is elevation 1,933.0. As a result, with respect to many of the flowage easements on Chatuge, TVA has the right to remove structures or fill below elevation 1,933.0.

The TVA property requested by BRMEMC is not subject to flowage easement. Based on surveyed contour data, only small portions of the requested property are located within the limits of the 100- and 500-year flood elevations, and BRMEMC would place fill material to raise those portions to elevation 1,933.0, which is 4 feet above the 100-year flood elevation at this location. This small amount of fill material would not significantly impact floodplain values, and BRMEMC's request to place fill material is consistent with EO 11988 and the TVA Flood Control Storage Loss Guideline.

Land Use

Because of the far-reaching, negative impact of this decision on Towns County today and for generations to come, we request: - Tom Kilgore should meet in Knoxville with a small delegation of Towns County citizens and management. He should hear first hand from those who will be adversely affected by the construction of the substation so that the true consequences are heard and considered. (**Comment by:** *Lindey and Mark Fitzgerald*)

I would love to meet you in Hiawasee or Chattanooga to discuss this matter with you. I know your schedule is crazy, as is mine, but could you possibly meet me sometime in December? I will drive up from Atlanta to meet with you. I know that is asking a lot, but I would appreciate your consideration. (**Comment by:** *Barry V. White*)

TVA Response: Mr. Tom Kilgore, President and Chief Executive Officer of TVA, and Anda A. Ray, Senior Vice President, Office of Environment and Research and TVA's Environmental Executive, met with Mark and Lindey Fitzgerald, members of the Towns County Homeowners Association on December 16, 2008.

In the Draft EA, TVA states that the remaining acreage in Parcel 52 would be suitable for recreational purposes, ie park, campsites, ball fields. For the record, in TVA's Land Planning document, Developed Recreation is the category recommended for Parcel 52 with no mention of the substation. We have submitted comments to TVA concerning this lack of honesty and clarity. However, the Developed Recreation will be a moot point IF the substation is built. The Towns County Recreation Department as well as the various citizen groups who previously supported recreational use for Parcel 52, have all stated that they will withdraw that support if a power substation is built on any portion of Parcel 52. Safety, logic and common sense all should tell you that no parent will allow their child to play in an area with signs saying Warning Keep Out. Hazardous voltage inside will shock, burn or cause death. (**Comment by:** *Lindey and Mark Fitzgerald*)

TVA Response: Parcel 52 consists of 9.4 acres. BRMEMC's proposal involves only 1.6 acres of this tract. The remaining approximately 8 acres would be of sufficient size to support a number of different recreational uses.

TVA has a set of Values on their website including accountability, integrity, respect. Mr. Kilgore should respect the comments and opinions of the people who will be most affected by his decision. His decision should be based on an honest assessment of its permanent and negative ramifications and he should be aware of his accountability to the future integrity of the lake, the land and the environment of the region. (**Comment by:** *Lindey and Mark Fitzgerald*)

TVA Response: TVA recognizes the importance of striking a balance among the competing demands placed on the land and water resources. TVA has evaluated the impacts of the proposal on the environment and considered the comments received from the public on the proposal.

TVA should elevate this decision to require a hearing by the full Board of Directors. (**Comment by:** *Lindey and Mark Fitzgerald*)

TVA Response: Comment noted.

Parcel 52 is prime lakefront property which, if residential, would sell for anywhere between \$500,000 and \$1,000,000 per HALF acre. We recognize that this is TVA land, not residential, and that it has limited potential uses under the TVA guidelines. But the difference between \$1,500,000 – 3,000,000 and \$100,000 is unsupportable. It would seem that a \$500,000 asking price would be much closer to what could be considered to be a fair price. As an example, the number two site considered by BRMEMC is one-half mile south, not on the lake with an asking price is \$600,000. TVA would do well to involve Towns County Realtors in the price evaluation. These people understand land values here much better than TVA 'experts' from afar. The TVA assigned cost of \$100,000 for the approximately 1.6 acres at the south end of Parcel 52 is irrational and without any correlation with Towns County land valuations. **(Comment by: The Towns County Homeowners Association)**

Our first question to TVA addresses the fair market price that has been set for 1.6 acres of lakefront property. In a communication sent to some homeowners, TVA states that if the proposal to sell the land to BRMEMC is approved, TVA would be compensated for the fair market value of the property. This 1.6 acre piece of land includes lake frontage as well as frontage on Hwy 76 making it valuable commercial/retail property ù not to mention what its residential value would be. We are aware that TVA's rules prohibit it from selling its land for residential development; however, the record should state that lakefront residential property sells for approximately \$450,000 ù 500,000 for a 1/3 to acre home site. In the Draft EA, TVA makes note of the fact that EMC has looked at alternative sites for the substation but Parcel 52 presents the lowest cost option. The value/price that TVA has set for Parcel 52 is considerably below what is fair market value and thus has insured that Parcel 52 will be the lowest cost option for EMC. At the November 13th meeting, EMC displayed a chart showing the other land they considered. The EMC representatives said that the second choice site, which does not sit on the lake, has an asking price of \$600,000. This is in comparison to a lakefront parcel of similar acreage with a TVA-determined price of only \$100,000. This is not fair market value. **(Comment by: Lindsey and Mark Fitzgerald)**

I don't understand the "fair market price" of Parcel 52. I would like to know how it is determined, what comps are used, etc. If it is about the money, we can find a way to raise the money and put a park there. The main reason EMC has determined that Parcel 52 is their top choice is cost. If you study their chart showing the other alternatives, the cost to procure Parcel 52 is considerably less than any other site they have studied. The price is a large factor and we would like to know more about the process TVA uses. **(Comment by: Barry V. White)**

The total TVA property where parcel 52 is located is aprox. 9 acres. After the substation is built on 1.4 acres, the remaining 7.6 acres have little value. The total 9 acres is worth millions. The TVA is selling land worth millions for \$165K and at the same time raising rates because they are not brining in enough money. Please explain why this is a financially proper transaction. A private company could not do this unless they were stupid or dishonest. **(Comment by: Gus Neville)**

I find the price TVA has put on this parcel to be totally unreasonable and very low compared to other associated land values nearby and particularly for lake front property. Any part of Parcel 52 used for a substation (approx. 1.8 acres) will render the remaining portion of the 9 acre tract useless. Even if the remaining portion was to be used for a park or recreation fields citizens have spoken that in "no way" would they use it or let their

children play there. This land should have a comparable value of \$500K to \$1.0 M per half acre. **(Comment by: Robert Keys)**

The people realize you will do whatever you and TVA want. This meeting was foolhardy. Also saying \$100,000 for 104 Ac on the lake with comm. Zoning is quite the deal of the century many of your displays were vague and non revealing as \$100,000 for site cost and your (EMC) reps stated it was land cost. Another eyesore. **(Comment by: Robert L. Zobel)**

TVA Response: The requested property, an approximate 1.4-acre portion of Parcel 52, was appraised to determine the minimum bid value. This value was determined by considering the requested use of the property and the development commitments listed in the Commitments section of the EA. The other permissible developed use of Parcel 52 that commenters have raised is recreation. Depending on the kind of recreational use assumed, TVA estimates the value of the 1.4 acres sought by BRMEMC to range from \$81,000 to \$243,000. The estimate for a use limited to electric transmission falls within this range. The approximately 8 acres of Parcel 52 would be of sufficient size to support developed recreation in the future. Under TVA's Land Policy, no part of Parcel 52 could be used for residential purposes, the highest valued use identified in these comments.

TVA states in its operational material that, if a TVA owned lakeshore parcel is to have its use designation changed to industrial or commercial uses that TVA intends that these uses be water related. BRMEMC has stated openly that they have no need for lake water. This requested use does not fit the stated TVA guidelines for water related uses and should therefore be denied. **(Comment by: The Towns County Homeowners Association)**

TVA has violated their own rule that TVA provided land be used for water related activities. **(Comment by: The Towns County Homeowners Association)**

TVA Response: The TVA Land Policy states that TVA leases or easements for commercial recreation purposes shall limit the use primarily to water-based recreation designed to enhance the recreation potential of the natural resources of the river and be a stimulus for regional economic development. Similarly, industrial requests for use of TVA property must contain a water-based component. This policy does not apply to property transfers to TVA distributors. In addition, Site 5 on Parcel 52 is located away from the water.

Page 10 – “A substation would be generally compatible with existing land uses (and) would have no significant impact on existing land use”. Of its nature a substation is aesthetically challenged. It is a 50-foot high monster which, here, will be sitting right on the highway and on top of the existing campground. The claim of no significant impact is subjective on the part of TVA and absurd. It could destroy the campground business and will severely restrict the ability to further use the balance of the parcel. **(Comment by: The Towns County Homeowners Association)**

The parcel 52 is the most unlikely site to put an “eyesore” Sites 4, 6 and 7 would be preferable. Even considering the “supposed” additional costs.” - Electrical Substation- In addition, the negative opinions that have been expressed by the (majority) citizens who live in the area certainly should be a deciding factor; since they are also customers. **(Comment by: Gordon R. Frank)**

I believe the Parcel 52 could be used for recreation. The lake is one of Hiwassee most valuable assets and should not be used for an ugly substation for EMC. I drive to town everyday and to put a substation there would spoil the view as you enter Hiwassee, GA. **(Comment by: Howard Walker Jr.)**

With 7 possible sites under consideration - why must it be in such a conspicuous location? - does it need to be near water? Let's keep our beautiful views of the lake unobstructed. Surely other properties should be considered. **(Comment by: Jones)**

The TVA should not sell TVA land, which belongs to the public, for a very cheap price for a use that the community is vehemently against for economic and aesthetic reasons. The TVA has an elaborate process which is proposing to sell Parcel 52 to the EMC. The process wants public input but obviously provides for prioritization in favor of the EMC while ignoring public input. This deal was set between the TVA and the EMC before the process even started. The price was agreed to without any comparisons to property that was in a more suitable location. Selling only 1.4 acres of 9 is cheating the public. The rest of the land is unusable, so make the EMC buy it. **(Comment by: Joan Neville)**

If a substation is put on Parcel 52 the rest of the land can be used for nothing else and I don't agree with that. There are other places you can put a substation. **(Comment by: Tina)**

TVA Response: The proposed substation would be located near a commercial area. The substation would be located behind these businesses and not impede the use of the marina. As stated in the EA, a vegetative screen of mixed evergreen and evergreen shrub species would be planted at a 25-foot-minimum width around all sides of the substation. The vegetative screen must have a 100 percent survival rate for one year. An 8-foot-high chain link fence with dark green vinyl slats would be constructed surrounding the substation. This would potentially obscure some views of Chatuge Reservoir for motorists traveling along U.S. Highway 76 at several viewing positions. However, the vegetative screen would substantially contribute to the substation being a part of a broader context of visually contrasting elements in the landscape as opposed to a focal point.

TVA manages lands for multiple public benefits. To reach sound land use decisions, TVA places high value on public opinions about specific land use proposals. Public participation is a vital part of the TVA land use decision-making process, but the number of people supporting or opposing a proposal is not determinative.

The Substation Locations and Transmission Line Routes section of the final EA discusses the analysis of BRMEMC's seven alternative substation locations and three alternative transmission line routes, including cost information. Parcel 52 consists of 9.4 acres. BRMEMC's proposal involves only 1.6 acres of this tract. The remaining approximate 8 acres would be of sufficient size to support a number of different recreational uses.

CEC Part 1 item #7 - "Involves more than minor amount of land?" By the approval of the 1.6 acre Sub Station on 17% of the 9.5 acres currently designated as "Recreation" on Parcel 52, the remaining 83% of the land would be rendered as "useless" for recreation uses, as commented on by coaches of the Towns County Youth Soccer Teams and other

recreation users. - These teams currently have more than 190 players enrolled. (**Comment by: The Towns County Homeowners Association**)

TVA Response: TVA prepared a categorical exclusion checklist (CEC) to begin the environmental review of the planned substation and transmission line. A portion of the information gathered in the CEC was used in preparation of the draft EA. TVA uses the CEC as one of many tools for identifying potential resource impacts associated with proposed actions. Although the CEC has been replaced by this EA, a number of factors are involved when determining what is a minor amount of land when applying the CEC. For example, TVA controls in fee ownership approximately 1,767 acres on Chatuge Reservoir and approximately 293,000 acres across its reservoir system. BRMEMC's request for use of 1.6 acres is about 0.1 percent of the TVA acreage on Chatuge and less than 0.001 percent of TVA's land on the reservoir system.

Currently, TVA has not received a land use request for commercial or public recreation associated with Parcel 52. TVA's evaluation of land use requests does not guarantee approval.

How much land around Lake Chatuge, our reservoir, does TVA plan to keep in its undeveloped state? Which land, developed or undeveloped, at this time in Towns County is best for the health and environment of the area. All lake-side land that is disturbed causes great challenges for the health of the lake, a reservoir that is already in great distress. Striped bass is no longer a healthy option for children or pregnant women - and it should not be eaten more than 2x week by others. Why disturb more lakeside land. A decision by BRMEMC is primarily about finances - more land in an accessible location for the least amount of money. Is consideration given to the needs of the community which relies on tourism for the greatest income. Envision huge poles and towers connecting numerous wires as tourists head into town on the main road. There has to be value given to undeveloped land, to its beauty, to the health it brings to the environment, to the joy it brings - as green space - for those who drive by. (**Comment by: Ellen Pease**)

TVA Response: The Land Use section of the EA describes the amount of land surrounding Chatuge Reservoir that is managed by TVA. A Mountain Reservoirs Land Management Plan (Plan) is under development by TVA. The Plan would guide land use and resource management decisions concerning TVA-managed public lands located along the nine mountain reservoirs, including Chatuge. The Substation Locations and Transmission Line Routes section of the final EA discusses the analysis of BRMEMC's seven alternative substation locations and three alternative transmission line routes.

The proposed substation would be located near a commercial area. The substation would be located behind these businesses and not impede the use of the marina. As stated in the EA, a vegetative screen of mixed evergreen and evergreen shrub species would be planted at a 25-foot-minimum width around all sides of the substation. An 8-foot-high chain link fence with dark green vinyl slats would be constructed surrounding the substation. This would potentially obscure some views of Chatuge Reservoir for motorists traveling along US 76 at several viewing positions. However, the vegetative screen would substantially contribute to the substation being a part of a broader context of visually contrasting elements in the landscape as opposed to a focal point.

Need for Substation

BRMEMC will argue that time is of the essence. The issue of a substation to serve the south and east parts of Towns County has been a recognized requirement for many years. Only within the last two years has it become 'urgent' and that urgency is now tempered by the present economic situation. Construction in the county is at a new low and financing is well known to be difficult. This is also true for BRMEMC. There is time now to do it right and TVA should encourage this approach. **(Comment by: *The Towns County Homeowners Association*)**

This decision is huge for the long term well being for the city of Hiawassee, the homeowners and businesses in the area, and the overall look and feel of our community. It could be argued, I guess, that it is in the short term best interest of the community, but someone will need to convince me that this is the best long term solution for all that are involved. Please don't make this short term decision. I truly believe this is a mistake for the long term best interest of our community. **(Comment by: *Barry V. White*)**

TVA Response: BRMEMC has provided a needs analysis to TVA and TVA has independently reviewed it. BRMEMC operates one other substation, Woodsgrove, in the Hiawassee area. The Woodsgrove Substation services 8,328 customers and has been operating above firm capacity since February 2004. The firm capacity of the Woodsgrove Substation is 20 megawatts (MW) and maximum capacity is 40 MW. On January 3, 2008, the electrical load reached 32.4 MW. With an estimated 5.4 percent yearly increase in electric demand, BRMEMC anticipates that the demands will exceed the transmission line system's capacity in June 2009. Attachment A of the final EA includes the BRMEMC needs analysis. BRMEMC's projected growth of 5.4 percent may be too high in light of today's financial situation, but firm capacities have been exceeded by the growth that has occurred already. Reliable service is already at risk because of this.

NEPA Review and Public Participation

PLEASE do not change zoning on any TVA parcel zoning. **(Comment by: *Maria E. Duben*)**

Thank you for having this meeting and all of your hard work keeping our county safe during times of critical weather conditions. **(Comment by: *Perry Bush*)**

The Towns County Homeowners Association (TCHA) has evaluated the TVA Draft Environmental Assessment (DEA) issued in October 2008 and has prepared the following response. We take note that the EA supports the BRMEMC proposal for locating an electrical substation on the south end of Parcel 52. **(Comment by: *The Towns County Homeowners Association*)**

In summary, the TCHA concludes that this DEA is so superficial and poorly supported that it cannot be used to endorse the proposed Action Alternative. We also conclude that, if it were to be done properly, the No Action Alternative would be dictated. **(Comment by: *The Towns County Homeowners Association*)**

Enclosed are the comments of the Towns County Homeowners Association on the TVA Draft Environmental Assessment of the Blue Ridge Mountain Electric Membership Corporation Proposed Substation. We trust that you will give them a fair and very thorough

evaluation. The TCHA has concluded that this DEA is so superficial and poorly supported that it cannot be used to endorse the proposed Action Alternative. We also conclude that, if it were to be done properly, the No Action Alternative would be dictated. We trust that, when TVA looks behind the façade at the detail (or lack thereof) they will agree.

(Comment by: *The Towns County Homeowners Association*)

TVA Response: These comments have been reviewed and noted. TVA has provided additional information in the EA to address the comments it has received and has responded to all substantive comments on the EA.

Questions: If a large majority of Towns County residents are against this substation, why do you continue with your efforts? Don't the people's voices count for anything?

(Comment by: *Gary W. Meier*)

Thank you for your open mindedness in permitting us to comment on this issue. The area being considered is so beautiful it would be a shame for folks going through Hiawassee to be greeted with a substation. Also, how ideal it would be for a recreational area.

(Comment by: *Lorie McDonald*)

I am getting the feeling that TVA is having this meeting out of courtesy of our request but the meeting itself will have little bearing on the decision to proceed with this sub station. You not coming sends a message to me as well that possibly this decision is already made and this meeting is a waste of your time. I wanted to have the meeting because in my heart I thought TVA wanted to hear from the people and this meeting was not a item you could check off the list of things to do. I want to ask you: 1. Will our comments be strongly considered in this decision for the sub-station? 2. Are you truly considering other sites?

(Comment by: *Barry White*)

While a friend of Joe Satterfield, CEO of BRMEMC, and while I respect his judgment and his leadership, I realize that his support of this project must be (because of his position) based solely on the economics of BRMEMC. However, this "business" decision does not take into account public opinion and the current pristine state of our lakeshore and town.

(Comment by: *Alton Higgins*)

Please protect us from Gov't and utility agendas that don't have the concerns of our county citizens in mind. **(Comment by: *Madeline Botting*)**

TVA has failed to do due diligence on the BRMEMC cost numbers. **(Comment by: *The Towns County Homeowners Association*)**

TVA is ignoring the fact that there are suitable alternatives for BRMEMC, more expensive perhaps, but not out of reach. **(Comment by: *The Towns County Homeowners Association*)**

In summary we find the supporting analysis to be superficial and substantially subjective. Further we take note that, while much of the citizen input has been included and some of it commented upon by way of rebuttal, other was simply included without comment or not included at all. The TCHA can only conclude that this document was derived with the sole purpose of creating supporting paper for your power customer's proposal with the least amount of examination and effort. We urge that it be rejected and BRMEMC be directed to sit with the county management who have volunteered to assist in the development of an

alternative more suited to the best interests of Towns County and its citizens. (**Comment by:** *The Towns County Homeowners Association*)

Instead you chose to use multiple quotes from Lamar Paris in support of the proposal. While Mr. Paris may own property in Towns County, he does not live or work here. In fact he is the Commissioner of Union County. As such, he should stick to Union County affairs and avoid taking issue with this county. The comments of Mr. Paris should be weighed as a property owner not as an elected official from another county. (**Comment by:** *The Towns County Homeowners Association*)

In the following discussion we will critique the contents of the EA. But, before going into that detail, there are some general comments that are worth pursuing. The EA fails to account for the strong opposition to the proposal from the citizens of Towns County. While you do catalogue some of the comments in Attachments B (39 con. 2 pro) and C (294 con and 2 pro) and have attempted to counter some of the arguments (Attachment B), you have failed to account for the over 600 petition signatures against the proposal submitted by TCHA and the additional petition signatures submitted by the county. You ignore the obvious conclusion that the citizens of Towns County and the County management are strongly opposed to the proposal. (**Comment by:** *The Towns County Homeowners Association*)

TVA has ignored or dismissed summarily the views of over 600 county residents and the County Management; instead TVA relies on the opinions of employees and consultants who are unfamiliar with Towns County, do not live here and have no vested interest in its well being. (**Comment by:** *The Towns County Homeowners Association*)

More than 600 people responded to oppose the Blue Ridge Mountain EMC request for TVA to sell them two acres of lakeshore property, also known as PARCEL 52, located south of the City of Hiawassee on US 76, as the proposed site of an electrical substation. In spite of this number, 600 strong, we feel the TVA is not listening to our concerns. An Environmental Assessment supporting the BRMEMC request either dismisses or does not recognize our grave concern in this matter. (**Comment by:** *James and Kathleen Hancock*)

Our Town's County Commissioner, Bill Kendall, is opposed to this project as are the residents of Hiawassee and our concerns are not being heard or legitimized. We are the people who live and work here and pay taxes and our opinions and concerns need be recognized. (**Comment by:** *James and Kathleen Hancock*)

The Towns County Homeowners Association (TCHA) submitted more than 600 opposing petition signatures to Mr. Ken Parr at the TVA offices in Chattanooga. This is a very high number considering the light population of Towns County and only 820 Hiawassee citizens. (**Comment by:** *Wesley Lerdon*)

The TVA DEA of Parcel 52 did not mention the approximately 60 letters by Towns citizens who objected to the sub station. The DEA quotes from only a selected few of those letters, mailed to you in Knoxville by Towns County's sole Commissioner, Bill Kendall, who opposes the BRMEMC application. 6. The TVA DEA also makes no mention of receiving our TCHA Petitions, with 600 signatures, sent to TVA's Ken Parr in Chattanooga. The DEA only mentions "62 signatures from a small group". These were from other Towns County property owners who were not referencing Parcel 52, but concerned about Parcel 77, also on Lake Chatuge. (**Comment by:** *Wesley Lerdon*)

We urge TVA and BRMEMC to put forth full cooperation to keep this matter in the forefront and consider the environmental impact it would have on the lakefront location. We are the residents who fully understand environmental impact and loss of property values, if such and eyesore is permitted to front the lake. (**Comment by:** *James and Kathleen Hancock*)

TVA Response: To reach sound land use decisions, TVA places high value on public opinions about specific land use proposals. Public participation is a vital part of the TVA land use decision-making process, but the amount of public support or opposition to a proposed action is not determinative. Each proposal is evaluated on its own merits. Decisions are made after careful and thorough consideration of the project need and balance among public use opportunities. Based on 2007 Census information, Towns County has about 11,000 people. TVA received comments from 58 people on the Draft EA. It also received petitions listing about 600 people. Assuming no overlap and that all those commenting made negative comments (neither of which is true), only six percent of the population of Towns County oppose BRMEMC's proposal sufficiently to comment on it. This does not diminish the importance of the issues raised by these commenters. As discussed in the EA and in response to other comments, TVA carefully considered information about alternatives to Site 5 on Parcel 52 and concludes that it is a reasonable location for the planned substation and associated transmission line.

Further you have not mentioned the opposition to the proposal from the Hiwassee River Watershed Coalition, a group which you support and fund. Their comments count. (**Comment by:** *The Towns County Homeowners Association*)

TVA has failed to recognize the total opposition from citizens of Hiwassee and Towns County. The Hiwassee River Watershed Coalition has also opposed any development of this parcel. (**Comment by:** *Robert Keys*)

TVA Response: TVA has not received a comment from the Hiwassee River Watershed Coalition. See response to previous comment.

The discussion of power lines is largely avoided by BRMEMC causing concern that our citizens may not really understand what is being proposed. The EMC studied three routes and picked as the best the one which runs from the Woods Grove substation through the middle of the City of Hiwassee. But these are not clearly referred to in their briefing material as transmission lines which would replace the existing much lower capacity distribution lines. This is a significant change/upgrade which has not been widely publicized and which will require pole upgrades as well. The EMC is advertising this route as an upgrade which it is from a transmissions standpoint but these poles will add nothing to the ambiance of the town. While we cannot argue with the selected route, we do question whether any serious effort was spent on looking at burying the lines at least through downtown Hiwassee. (**Comment by:** *The Towns County Homeowners Association*)

TVA Response: The cumulative impacts of the upgraded transmission line in its entirety are addressed in the EA. Burying transmission lines or high-voltage distribution lines is more technically complex, can be expensive, and can increase costs significantly. There are also continuing maintenance issues with buried lines, including possibly unburying them when maintenance has to be performed. Rapidly

responding to failures on buried lines also is more complicated and can take more time.

Page 20 – Cumulative Impacts – “...TVA has determined that there would be insignificant cumulative impacts associated withthe approval of a Section 26a permit.” It would appear from the supporting data provided that TVA has determined the result in advance and then tried to fill in the rationale to support the predetermined result. (**Comment by:** *The Towns County Homeowners Association*)

TVA Response: Based on available information about BRMEMC’s transmission line upgrade plans and potentially impacted resources, it is unlikely that there would be significant cumulative impacts. If TVA approval of these plans becomes necessary, it would conduct further review of the line upgrade to confirm or change this determination depending on that analysis.

TVA has ignored the will of the Towns County residents and government, offered so little detail in support of the decision as to appear either defensive or fraudulent. Instead TVA has concluded (on page 5) that there are “...no new issues raised... by the public input process and that the DEA adequately addresses the Action Alternative”. That may be true if TVA simply closes its eyes and asserts the defense enough times. But the fact of the matter is that the ‘old’ issues are there and that they are being ignored, misrepresented or dismissed by TVA in the interest of the EMC. (**Comment by:** *The Towns County Homeowners Association*)

TVA Response: The sentence referenced on page 5 states the following: “TVA has concluded that no new issues have been raised thus far by the BRMEMC public input process and that the EA adequately addresses the Action Alternative.” TVA places high value on public opinions about specific land use proposals. Public participation is a vital part of the TVA land use decision-making process. The public notice comments and comments received on the Mountain Reservoirs Land Management Plan draft EIS that actually pertained to the BRMEMC proposal were used in the BRMEMC draft EA to identify and evaluate potential impacts associated with the substation and associated line easement.

CEC Part 1, item #3 - "Involves non-routine mitigation to avoid adverse impacts?" This would involve non routine mitigation to avoid adverse impacts to several other items. (**Comment by:** *The Towns County Homeowners Association*)

The CEC form completed as part of the DEA has items in Parts 1,2,3, and 4 that should be checked "yes" but are instead checked "no" making the DEA more favorable to BRMEMC. (**Comment by:** *Robert Keys*)

TVA Response: TVA prepared a categorical exclusion checklist (CEC) to begin the environmental review of the substation and transmission line. A portion of the information gathered in the CEC was used in preparation of the draft EA. TVA uses the CEC as one of many tools for identifying potential resource impacts associated with proposed actions. The nonroutine mitigation measures that are listed under the Commitments section of the final EA were identified after the CEC was completed. This EA replaces the CEC.

CEC Part 1 item # 6 –“Is one of many actions that will affect the same resources?” Would affect the same land resources if the designation of any portion of Parcel 52 were reclassified to Industrial, as the TC Recreation Department use of the remainder of has been refused by Soccer Teams, and others, to locate recreation or park (kite flying, ball games, etc.) adjacent, as a power sub station would render recreation uses "impossible". **(Comment by: The Towns County Homeowners Association)**

Parcel 52 was eventually intended to be a much needed recreation sports complex for the county - this is actually the best site for that purpose. Another reasonably priced site would be better suited for the substation. Considering traffic flow and deterioration of the landscape another site near less traveled roads would be a better use of land. **(Comment by: Leslie N. Jones)**

TVA Response: If TVA approves BRMEMC’s request, the construction and operation of the planned substation and transmission line would neither preclude nor significantly affect potential recreational uses that would otherwise be considered by TVA on Parcel 52.

CEC Part 3 item #5 - Actual costs for site purchase, including site preparation, could probably be several hundred thousand dollars more than the \$160,000 total, including property, stated by the BRMEMC in their presentations and rudimentary cost figures for Parcel 52. Other sites BRMEMC contend they have considered, do not provide detail in accord with Due Diligence for public review either. **(Comment by: The Towns County Homeowners Association)**

CEC Part 3, item #5 - Using the BRMEMC project description, and the above preliminary calculations for Parcel 52, a large overrun of the stated BRMEMC site costs would probably be experienced by BRMEMC and should be revisited by the utility to gain a complete estimate and review of related costs. **(Comment by: The Towns County Homeowners Association)**

TVA Response: See responses to previous comments. Prior to submitting this request to TVA, BRMEMC evaluated seven possible substation locations. Five were located on private property, and two were on TVA property. Some of the private property owners would not sell and/or subdivide their property for partial sale. The remaining sites would require extensive site preparation to construct the substation, which along with the cost of acquiring the property would not be financially feasible for BRMEMC. BRMEMC provided TVA with construction cost estimates for all seven possible substation locations. The construction cost estimates for each possible substation location included the cost of acquiring the property, site preparation, fencing, and new transmission lines. The construction cost estimate for Parcel 52 is significantly lower than the other possible locations. The alternative locations have been discussed in the EA.

One last comment: I question whether or not TVA personnel can maintain total objectivity in assessing the environmental impact of a substation, given that TVA's top management has already allowed this request by BRMEMC to be put forth, implying that it must be acceptable! **(Comment by: Don Berry)**

TVA Response: TVA does not control requests it receives from its distributors, including the request made by BRMEMC that is evaluated in this EA. TVA's evaluation of land use requests does not guarantee approval.

I have reviewed the DEA and the CEC and find they are totally subjective, misleading of facts and information and I believe written so that both favor BRMEMC for the sole purpose of TVA to say it is okay to let EMC have this land for a substation. I really wonder if EMC were not the ones who actually wrote these two documents. (**Comment by:** *Robert Keys*)

TVA Response: This EA was prepared by TVA and, as appropriate, uses some information provided by BRMEMC. The final EA includes TVA's assessment methodology.

Project Description

CEC Part 3 item # 5 -"Discharge dredged or fill materials?" Due diligence has Not been exhibited by BRMEMC to date as to their estimated \$100,000 cost for this site, including improvements. The BRMEMC project description stating only "0.2 acre feet" (2.4 Inches !!) is an obvious mistake as is their estimate of "21 cu. yds." of fill. (**Comment by:** *The Towns County Homeowners Association*)

BRMEMC has costed as significantly smaller amount of fill than this for Parcel 52. By their own admission, their numbers are "best guesses" only. The fill conclusions also raise considerable concern about discharge from fill. (**Comment by:** *The Towns County Homeowners Association*)

There is the issue of fill on the parcel. The TVA DEA is very misleading in stating "only 21 cubic yard" of fill will be needed. That is less than two dump truck loads of fill dirt and when the topo map in your DEA is examined fill has to take place from the 1729 elevation to the 1933 foot elevation. This equates to 10,325 cubic yards of fill or fill and gravel. A far cry from 21 yards. (**Comment by:** *Robert Keys*)

So, the following data is estimated by laying the proposed 1.6 acre site plan over the TVA topographic contour maps: This data presents basis for concern about "Discharge. filled materials". Using the BRMEMC layout showing approximately 1 acre requiring fill to get "above the 1933 elevation" the "full capacity" of the reservoir (required by TVA) would require an average acre depth of 4 feet(compacted 20% to 3.2 feet) = 6518 cu. yds. (**Comment by:** *The Towns County Homeowners Association*)

If hauled by large trucks of 17 cu.yd. capacity, this would total 384 truck loads at average cost of \$250 each at present day cost per truckload for total contracted fill cost of \$95,860. This large amount of fill should be contained by a Poured Concrete Wall and drained in accord with TVA requirements (page 3), that require Georgia Storm Water Permit. (**Comment by:** *The Towns County Homeowners Association*)

The TVA DEA estimates less than "0.2 (2.4 inches) Acre inches" of fill for the 1.6 acre sub station site, totaling "21 cubic yards". The actual estimate should be 4 acre feet (compacted 20% to 3.2 ft) fill totaling 10,325 cubic yards at current costs of \$151,750 to raise the site to "above the 1933 "full capacity" elevation of the reservoir, as required by TVA, (if TVA fill and construction restrictions in the "flood plain" below 1933, were ignored and waived). (**Comment by:** *Wesley Lerdon*)

TVA Response: Refer to earlier responses about the portion of Site 5 that is below the 100- and 500-year floodplains. The assumptions in these comments about this are incorrect. BRMEMC provided TVA with engineering drawings that TVA concludes reasonably represented the required amount of fill material.

Given their preference for Parcel 52 and their large understatement of the filling cost, one has to wonder about the accuracy of the site prep estimates on the alternative sites and whether they may be artificially high (see \$600k for fill on Parcel 51). (**Comment by:** *The Towns County Homeowners Association*)

TVA Response: TVA has reviewed BRMEMC's cost estimates and concludes they are reasonable. On average, a 69-kV pole construction on a five-mile TL segment would cost TVA approximately \$500,000 per mile. BRMEMC's range of costs for TL improvements is approximately \$550,000 per mile. These costs are consistent with such improvements in the industry generally. BRMEMC also estimates that the site preparation of Site 6 would cost approximately \$500,000. The land use of Site 6 and the surrounding review area was predominantly forest. There would be more site preparation required for an area that was predominantly forest versus a site that was predominantly pasture. For example, Sites 2, 3, 4, 5, and 7 and the surrounding review areas are predominantly pasture, and the cost estimates for site preparation of these areas were significantly lower than Site 6. Due to the topography, Site 6 would also require more grading than some of the other sites, and BRMEMC may choose to install retaining walls or other types of structural reinforcements.

Recreation

I am in favor of 77 for recreational use. Reasons: 1) We have grossly out grown facilities 2) To dangerous for use at current Rec Fields 3) Out of date Facilities 4) Fair rides destroy Fields 5) Will have plenty of room for multi-purpose facility (soccer, football, baseball, basketball, walking trails, picnic areas, green space, and bike trails) (**Comment by:** *Michael Kuerny*)

TVA Response: Comments pertaining to Parcel 77 on Chatuge are out of the scope of this EA. These comments will be addressed in the final EIS for the Mountain Reservoirs Land Management Plan.

I would definitely prefer this property to be for recreation. It is too beautiful to be used for a substation. I'm sure you can find another site. (**Comment by:** *Kathleen Aparo*)

We need this property for Recreation for the above Towns County Students, not a Sub Station. (**Comment by:** *Barbara Shoak*)

I am representing the Recreation Dept. of Towns Co. here in Towns Co. we have very inadequate Recreation facilities. I am voicing a desperate need for land for new and more recreational areas. The county has 0 soccer fields, 3 baseball fields, and one geyu. We need more. Please consider us for tract 77 for a multipurpose Rec. facility located on Mull Rd. on Bell Creek and tract 52 for possible soccer fields but definitely 77. WE need it badly. (**Comment by:** *Alan Rogers*)

I'm representing the Towns Co. Recreation Dept. Voicing a desperate need for outdoor recreation sports facility. It would be a priority for first -Soccer fields (possibly at Parcel 52) but more importantly a place for outdoor multi programming. It is the tract parcel 77 located in Bell Creek section of Towns County. Please consider our sincere interest for the children and adults of Towns County. **(Comment by: Wes Hooper)**

Also, I don't believe that parcel 52 can harbor a substation and still be used for recreation by children. I feel it would not be safe. I understand the need for a substation, I just object to this particular location. **(Comment by: William Swett)**

Page 4 - "The construction of a substationwould not conflict with the existing or potential use on the remainder of the parcel." TVA claims here and elsewhere in the DEA that suggested alternative recreational land uses being considered for the remainder of the parcel would not be impacted. TCHA begs to differ. Placing a recreational facility where children of all ages will be present next to a high power substation is asking for trouble. Even though fenced, it cannot control the ball over the fence and the youthful desire to retrieve it. The EMR numbers presented attempt to make your case but parents will not buy it. The TCHA will not support any public use of that property if the substation is approved. The county Department of Recreation has also stated that they will not support recreational uses for the property if the substation is approved. **(Comment by: The Towns County Homeowners Association)**

Further, TVA has not recognized the immediate impact to the campground which is immediately south of the proposed location. (See attached statement from Mrs. Palmer, the campground owner) Campers have already indicated that they will not remain under the shadow of the station equipment. The impact to the future of that business could very well be severe. The construction of a substation on Parcel 52 definitely conflicts with adjacent existing uses and its proposed future use. **(Comment by: The Towns County Homeowners Association)**

No evidence is offered for this conclusion nor for the claim that it will not impact the future use of the balance of the parcel for recreation. No parent in their right mind is going to allow their child to play next to that facility with its warning signs about its hazard and potential 'death'. The Towns County Recreation Department has also endorsed this view. This is one more self-serving conclusion. **(Comment by: The Towns County Homeowners Association)**

CEC Part 4 item #3 -"Cause the displacement or relocation of businesses, residences, cemeteries or farms". The presence of the proposed sub station will likely cause the closing of the adjacent Campground and Marina business on the land owned by Mrs. Palmer (see attached affidavit). This is based on remarks by the tenants who say they would not continue to rent the campsites for their trailers, or use the covered boat slips if the substation were to be built on Parcel 52. **(Comment by: The Towns County Homeowners Association)**

CEC Part 4 item #8 "Potentially interfere with recreational or educational uses ?" It certainly would interfere with the current recreational classification, As parents and coaches have said the remainder of Parcel 52 could not and would not be used by the Recreation Department because of the potential dangers involved. **(Comment by: The Towns County Homeowners Association)**

The proposed BRMEMC sub station on 1.6 acres of parcel 52, adjacent to my property, could force me, Virginia Palmer, to close my Campground and Marina. This fact is based on campground residents who live in their campers parked on my property who have said they would not live in my campground if the power sub station was built on Parcel 52.

(Comment by: *The Towns County Homeowners Association*)

CEC Part 1 item # 8 - "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 ?" Scenic areas, recreational areas, and greenways (All three!!) would be adversely affected. **(Comment by:** *The Towns County Homeowners Association*)

CEC Part 4, item #2 - "Increase the potential for accidents affecting the public?" There would be great potential for adults and children chasing balls, kites and other objects that would go into the substation and cause the persons to climb the fence to retrieve the objects and be subject to electrical injury and/or death. **(Comment by:** *The Towns County Homeowners Association*)

The Towns County Youth Soccer League, of more than 190 players, said at the July meeting of some 270 Towns citizens, at the High School Auditorium, that if a sub station were built on Parcel 52, the League would not use the remaining 8 acres for soccer, as does the Towns County Recreation Dept. because of the hazards to adults and youth trying to retrieve balls, kites and other objects by climbing the fence that would surround the sub station. (The DEA assumes the 8 acres that would remain could be used for recreation.)

(Comment by: *Wesley Lerdon*)

TVA Response: BRMEMC has addressed public safety concerns in its design of the substation. The fence surrounding the substation would be locked unless workers were present. It would contain barbed wire over the 8-foot-high chain link fence, making retrieving of recreational items thrown over the fence improbable. It is explained in the EA that EMF levels at the substation would be less than those produced by household products. Any future recreation proposals that may occur on the remainder of Parcel 52 would be evaluated for safety impacts, but with standard safety measures, TVA does not anticipate there would be an impact on recreational user safety.

BRMEMC has addressed visual impacts to the adjacent campground and marina by using visual buffers. The chain link fence surrounding the substation would contain dark green vinyl slats. A vegetative screen would also surround the substation. The substation would be located behind these businesses and not impede use of the marina.

I am opposed to the property on Hwy 76 on the lake to be used for BRMEMC use. Nothing should be an eye sore much less installing dangerous lines at this point and so close to the school and across down town Hiawasse. **(Comment by:** *Lou Hewatt*)

TVA Response: BRMEMC would use standard safety measures such as grounding its planned transmission line that would be located on 0.2 acre of Parcel 52 if TVA approves this request. There would be minimal safety risk to recreational users of Parcel 52.

Socioeconomics

The EMC has based its proposal on financials impacts to the EMC – not the financial impact to Towns County. Towns County's stability and growth is dependant upon the lake – tourism. **(Comment by: Elizabeth H. Ruf)**

This County lives and dies based on its ability to attract tourists. **Comment by: Joe Ruf)**

Our town has become a recognized tourist attraction and THAT is important to our economy!! **(Comment by: Rhetta Grey)**

Towns County's economy is dependant upon the visitors who come to our area for the beauty of the mountains and lake. The proposed site, while being the least expensive has, in our opinion, the greatest detrimental impact on the desirability of Hiwassee as a tourist destination. The proposed property, were it to be values at fair market value, it to valuable to be used for a substation, because of its location on the lake and close proximity to town. **(Comment by: Cheryl and Robert Gehring)**

Do you guys realize the lives you are impacting and the growing anger that is going on in Hiwassee? Peoples lives, life savings could be impacted because of this decision (see below the anger that is growing from a couple who just retired from Atlanta to live up there fulltime this year). These folks will have to look at this thing for the rest of their lives as well as others that live in the area. The house I am trying to sell will lose value and that is real money our family will lose. I will be glad to let you talk to the real estate agent that is considering buying the place if you don't believe me. I am not bluffing. This is real and if you were in my situation or the couples below you would not be happy either. There are many other stories like ours if anyone cares. There are better options if you wanted to pursue them. Tell me the truth. Are we wasting our time and money on this issue? Just tell me and I will get on with my life. Joe from BRMEMC says "it is not in anyone's backyard". I want you to come to Hiwassee and sit on my back porch, talk to couple below and talk to Ms Palmer (lady the who owns the trailer park next door to the proposed site) and see if you agree with Joe. **(Comment by: Barry White)**

I am a volunteer business counselor for the small business owners of Towns County. Almost all the business in Towns County is either in the tourist sector, dependant on the tourist sector or indirectly affected by the tourist sector. We presently have a necessary but extremely unattractive power station welcoming tourists entering Hiwassee from the west. This station is right on the highway and unbelievably right on the lake!! Tourists have unfavorably comments on it to me many times. One comment was particularly insightful "Whoever did this doesn't understand the value of the lake"!! For a county that makes it's living on tourism it is a bad welcoming sight. Putting another, equally unattractive power station on the east entrance to Hiwassee would be a callused disregard for the economic future of a county that is blessed with the opportunity to excel in recreation and tourism. TVA should be helping us to increase the value of the lake for the economic well being of the local population not diminishing it for decades to come. Please consider another alternative site for the much needed additional power station. **(Comment by: Joseph Ruf)**

This letter is to document my strong opposition to the plan to build a power substation on TVA Parcel 52 in Hiwassee Georgia. Towns County has only one economic driver and that is tourism and recreation. Our ability to get manufacturing or other large employers to move to Towns County is almost nil. Virtually everyone in the county, either directly or indirectly, is dependent on a strong tourist season. We compete with every other mountain

county for the limited tourist dollar. Tourists only come to this area for two reasons, to use the lake and to admire the mountain lake views. A substation right on the eastern entrance to town and visible from the lake will not favorably impress anyone coming to this valley. We will look like a town from the industrial Midwest instead of a resort community. TVA should be helping us increase the value of the lake for the economic well being of the local population not diminishing it. This effort is being driven by engineers rather than by people that understand the larger issues at stake. Please consider another alternate site for the much needed additional power station. **(Comment by: Joseph Ruff)**

Page 19 – “No significant impact to property values would be likely (once) the public becomes accustomed to the presence of the substation and transmission line.” Where is the data that supports this claim? **(Comment by: The Towns County Homeowners Association)**

With a 50-foot high set of hazardous equipment overlooking the adjacent campground, the property value is not going to go down? In fact, the business will likely be severely impacted if not destroyed. The homes across the lake and on the hill to the east will be looking straight at the structure. These are homes which rely in part for their value on the mountain atmosphere of Towns County. **(Comment by: The Towns County Homeowners Association)**

“(The substation) ..would contribute to the cumulative impacts of human alterations in the environment.” Page 21). Potential subsequent owners will agree and will look at these views and automatically devalue the property. **(Comment by: The Towns County Homeowners Association)**

Real estate brokers have stated that land values in this area will go down, business at a nearby trailer park on the lake will loose business or go out of business. Then there is the issue of a big ugly massive substation right on the major highway (Hwy.76) going into Hiawassee. Planting of any amount of 10 foot trees to try and hide this obstacle will not help. Once this substation goes in it stays there forever--as ugly as it is. **(Comment by: Robert Keys)**

I am a homeowner of two homes in Beech Cove that sit directly across from the proposed sub station. We are very concerned about the value of our lakefront properties. We purchased one of the homes for investment purposes before I knew this was being proposed. This sub station will severely affect the price of this property. We have a buyer who is waiting to see what happens to the sub station before finalizing the deal. Neither he nor his grandchildren want to look at this station for the rest of their lives, and you can't blame them. This decision will impact the economic development of this area in a negative way. **(Comment by: Barry V. White)**

TVA Response: As noted in the Substation Locations and Transmission Line Routes section of the EA, the site chosen by BRMEMC, Parcel 52, is in a commercial area rather than a residential neighborhood and also is near transmission lines and the electric load center. This location would require very little site preparation and would minimize the amount of new transmission line needed. Research on transmission line impacts to property values generally indicates little impact in commercial areas (*Transmission Lines and Property Values: State of the Science*, Palo Alto, Calif.: Electric Power Research Institute, November 24, 2003,

Report No. 1005546). Therefore, this proposal would minimize potential impacts to property values in the area.

Parcel 52 currently is primarily open field maintained in fescue under an agricultural license. Adjacent land uses include a recreational vehicle community directly to the south and commercial development directly across US 76 to the east. Directly across the reservoir to the west, land use is residential subdivision. The existing scenic attractiveness of the area is common to minimal, and the existing scenic integrity is low already for property owners with potential views of Site 5 on the back part of Parcel 52 from the waterfront.

As noted in the Visual Resources subsection of the EA, the substation and transmission line located on Parcel 52 would contribute to a decline in scenic attractiveness and scenic integrity in the immediate area. However, with the vegetative screening and lighting requirements discussed in the Visual Resources subsection of the EA, the construction would not have significant direct or indirect impacts to visual resources. Impacts to property values due to visual changes would be small and would diminish over time as the vegetation matured.

Visual Impacts

I feel this substation is only the beginning of future destruction of the Lake's beauty and present day use. **(Comment by: Gene Hewatt)**

I am concerned about the aesthetics of our beautiful little town and the lake beauty. The EMC and TVA should make this a great consideration upon choosing the site. **(Comment by: Perry Bush)**

The beauty of our land here is what keeps us all happy and gives us peace. **(Comment by: Kathleen Aparo)**

I vote NO! to Parcel 52 being used as a substation. It will be an eyesore to everyone passing by and can be used for better use! **(Comment by: Roy A. McGriff)**

The proposed location is a scenic point on Hiawassee and there are many other locations where a substation could be built and not be an eyesore. I object to locating an electrical substation on parcel 52. **(Comment by: William Swett)**

It is highly inappropriate to build a power station in this location - an eyesore and potential danger!!! **(Comment by: Rhetta Grey)**

Other suitable locations like back in the woods etc. It would be an eyesore to Hiawassee. **(Comment by: Amy B. Black)**

While the location is commercially oriented, it is not industrially oriented and there is a large difference. Further the residences to the east and west are largely located above the site and so look down on the site which now becomes completely foreign to the existing landscape and uses. **(Comment by: The Towns County Homeowners Association)**

One of the major problems created by new electrical facilities is the appearance as viewed by the general public. In many parts of the country a great deal of money is provided for

extensive structures to “Hide” the facilities. In this part of the country (Towns County, GA) a good planting of evergreens surrounding the facilities. If the public did not see the substation located in the western end of Hiawassee you probably would not be having the uproar with the proposed new sub-station. **(Comment by: Arthur Mott)**

As one of the main to entries into town, the aesthetic of the substation, no matter how it is landscaped will be an eyesore greeting our visitors. For those individuals who live across the lake, a power substation is not what they anticipated as their view when they built their homes. This holds true for those businesses whose property is adjacent to the proposed site. **(Comment by: Cheryl and Robert Gehring)**

This unsightly substation will affect views of the lake as well as views as tourists enter our town. TVA please respect the beauty of your lake and prevent Blue Ridge EMC from building this unsightly substation. **(Comment by: Elizabeth H. Ruf)**

I am adamantly opposed to this substation on Parcel 52. I have a home on the lake and I will see this structure from my home. I know there is probably a need for this substation but I'm sure there are other areas in this community that could be used for this purpose. DON NOT build this on Parcel #52! **(Comment by: Mary Miller)**

It will be an unsightly plot on both our lakeshore and on a main entrance to town. **(Comment by: Alton Higgins)**

Please protect our lake and mountain views. **(Comment by: Madeline Botting)**

The Draft EA discusses the impact on visual resources. These conclusions are absurd. The construction of a mammoth, 50 foot steel and concrete structure directly on Hwy 76 and on Lake Chatuge's shores will most definitely have a very negative visual impact to the entire community. There are numerous residences in direct view of the proposed substation. The property values of these homeowners will most definitely decrease immediately and forever. One small example: there are 26 residences in Beech Cove Vista that will be affected by this project. A conservative estimate places an average value of approximately \$500,000 per property (many are lakefront with values in excess of \$1 million) for a combined property value of \$13,000,000. If we conservatively assume that the decrease in value is 20%, these 26 homeowners will immediately lose an average of \$100,000 in value/net worth or a total loss of \$2.6 million in this one neighborhood. Imagine the total loss to the community. **(Comment by: Lindey and Mark Fitzgerald)**

We understand the need for additional power capacity; however, we do not understand the choice of this location. Lakefront property is valuable and a precious, non-renewable resource; a power substation is unattractive and will forever change the scenery and the environment. **(Comment by: Barry V. White)**

Page 11 – Visual Resources “There would be insignificant cumulative impacts to the visual resources associated with the Action Alternative.” There is nothing insignificant about a 50-foot high 2-acre set of equipment sitting on top of the highway. An eight-foot fence and some ten-foot trees which do not have to last more than a year hide nothing. **(Comment by: The Towns County Homeowners Association)**

The surrounding landowners have told TVA what they think of this statement and you have ignored it. They are a much better judge of this value than someone located in Murphy or

Chattanooga. By your own admission the substation “would contribute to a decline in scenic attractiveness and scenic integrity in the immediate area”. TVA cannot have it both ways! (**Comment by:** *The Towns County Homeowners Association*)

This parcel of property is environmentally and aesthetically special - the only one near the road that goes through Hiwassee and should be left natural and undeveloped unless a crisis is imminent. (**Comment by:** *Unknown*)

TVA Response: See the Visual Resources section of the EA. As stated in the EA, a vegetative screen of mixed evergreen and deciduous tree and evergreen shrub species would be planted at a 25-foot-minimum width around all sides of the substation. An 8-foot-high chain link fence with dark green vinyl slats would be constructed surrounding the substation. This would potentially obscure some views of Chatuge Reservoir for motorists traveling along US 76 at several viewing positions. However, the vegetative screen would substantially contribute to the substation being a part of a broader context of visually contrasting elements in the landscape as opposed to a focal point. The existing scenic attractiveness of the area is common to minimal, and the existing scenic integrity is low already for property owners with potential views of Site 5.

Can TVA post pictures of a similar substation that has been built and describe what it will look like? How tall are the poles for the transmission lines? Despite the requirement for a fence and trees to hide the substation, won't there be large, tall and obvious poles and transmission lines? Will these follow Hwy 76 through town? Please provide more information to Towns County property owners about the visual effects of building this station. (**Comment by:** *Mary Lynn Miller*)

TVA Response: Photographs of similar substations have been placed in Attachment A of the EA.

Water Quality

Development of ANY TVA land affects water and land quality as well as land quality of the already developed land. (**Comment by:** *Maria E. Duben*)

TVA Response: See the Water Quality and Aquatic Ecology and Terrestrial Ecology subsections of the EA.

Electric and Magnetic Fields (EMFs)

The cumulative effect of radiation from high power line is the problem that is not being addressed. The public will be exposed to unsure hazards with repeated exposure. There are alternative sights that would have less environmental impact that should be selected in my opinion. (**Comment by:** *Steven Senart*)

It will require erection of 69,000 volt power line poles along main St. In addition to their being unsightly, as an electrical engineer, I can testify that these will cause increased RF interference in the air as dirt and humidity accumulates on pole insulators. (**Comment by:** *Alton Higgins*)

I am a retired electrical engineer, with experience with voltages up through 150,000 volts. I know what problems arise from high voltage! (**Comment by:** *Alton Higgins*)

Please protect our children from powerline emissions. (**Comment by:** *Madeline Botting*)

I am against bringing high Power lines through Hiawassee and exposing people in homes and businesses to the 69 volt electricity. It is not only a health hazard (accumulated does of exposure, but an eyesore for a tourist centered town. Please explore a less populated place and route for the high power lines. (**Comment by:** *Teri Stokes*)

TVA Response: See the Electric and Magnetic Fields section of the EA.

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