

Our Statement:

The Buck Mountain Community Organization was formed to fight the location of the power line on Buck Mountain and to explore alternatives to building costly transmission lines and new power plants that adversely affect the environment and land owners' property values.

For more information please visit <http://www.notvapowerline.com>

IT IS ILLEGAL TO SIGN THE NAME OF ANOTHER PERSON TO A PETITION.

Line No.	Please Print Your Name	Signature
1	Devonya King	<i>Devonya King</i>
2	Barbara Hullett	<i>Barbara Hullett</i>
3	Candie Dyer	<i>Candie Dyer</i>
4	Susan Medley	<i>Susan Medley</i>
5	Marie Johnson	<i>Marie Johnson</i>
6	Rose Hall	<i>Rose Hall</i>
7	Kristen Heather Stiles	<i>Kristen Stiles</i>
8	Lynn Seals	<i>Lynn Seals</i>
9	Lori Turner	<i>Lori Turner</i>
10	Darlene Vaughn	<i>Darlene Vaughn</i>
11	Tonya Hale	<i>Tonya Hale</i>
12	Angela Burgess	<i>Angela Burgess</i>
13	Dorothy Rowe	<i>Dorothy Rowe</i>
14	Deborah Elkins	<i>Deborah Elkins</i>

Line No.	Please Print Your Name	Signature
15	Mary Blevins	Mary Blevins
16	Jennifer Johnson	Jennifer Johnson
17	Beth Myers	Beth Myers
18	Judy Drewer	Judy Drewer
19	Tommy Adams Tommy Adams	Tommy Adams
20	Melinda Young	Melinda Young
21	Terry Monroe	Terry Monroe
22	Tiffany Dunham	Tiffany Dunham
23	Michael Cripps	Michael Cripps
24	Jeri Burks	Jeri Burks
25	Nelda Pierce	Nelda Pierce
26	Ronnie Layne	Ronnie Layne
27	Tammy Bouldin	Tammy Bouldin
28	Patricia Hill	Patricia Hill
29	Stephanie A. McDowell	Stephanie A. McDowell
30	Leigh S. Hillis	Leigh S. Hillis
31	Cherks A. Seals	Cherks A. Seals
32	Nancy B. Hayes	Nancy B. Hayes
33	Ray Carter Lane	Ray Carter Lane
34	Michael B. Lane	Michael B. Lane

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IT IS ILLEGAL TO SIGN THE NAME OF ANOTHER PERSON TO A PETITION.

Line No.	Please Print Your Name	Signature
1	Lisa East	Lisa East
2	Jon Scurlock	Jon Scurlock
3	Brent Stephens	Brent Stephens
4	Katherine Osburn	Katherine Osburn
5	AMANDA DIXON	Amanda Dixon
6	Nick Heller	Nick Heller
7	DAVID LANE	David Lane
8	Emily Shumake	Emily Shumake
9	Allen Kittinger	Allen W. Kittinger
10	Peggy Evans	Peggy Evans
11	Kate Scurlock	Kate Scurlock
12	Denis Kiely	Denis O. Kiely
13	Dana Gikard	Dana Gikard
14	Messiah Buswell	Messiah Buswell

Line No.	Please Print Your Name	Signature
15	Katherine A. Bertram	<i>Katherine A. Bertram</i>
16	Hector Black Hector Black	<i>Hector Black</i>
17	David Worth	<i>David Worth</i>
18	Caithlin Miller	<i>Caithlin Miller</i>
19	Jon Jonakin	
20	Jon Jonakin	<i>Jon Jonakin</i>
21	Bonita Barger	<i>BB</i>
22	Merritt Ireland Merritt Ireland	<i>Merritt Ireland</i>
23	Barker C Reynolds	<i>1750 Heatwood Dr</i>
24	GEORGE R. BARUARD	<i>George R. Baruard</i>
25	Sara Huggins	<i>Sara Huggins</i>
26	Linda Henderson	<i>Linda Henderson</i>
27	Chas O'Brien	<i>Charles O'Brien</i>
28	Christy Miller	<i>Christine Miller</i>
29	Rita BARNICK	<i>Rita BARNICK</i>
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IT IS ILLEGAL TO SIGN THE NAME OF ANOTHER PERSON TO A PETITION.

Line No.	Please Print Your Name	Signature
1	Charles Carter	Charles Carter
2	Mary Frances Carter	Mary Frances Carter
3	Ronald Jackson	5376230
4	Keith Cuth	
5	Shirley Vaden	Shirley Vaden
6	Harold Degehart	Harold Degehart
7	Karen Degehart	Karen Degehart
8	Marlene Underwood	Marlene Underwood
9	Betty Jackson	Betty Jackson
10	Barry Jackson	Barry Jackson
11	Sonya Monahan	Sonya Monahan
12	Dana Honeycutt	Dana Honeycutt
13	Judy Crabtree	Judy Crabtree
14	Wade Givens	Wade Givens

Line No.	Please Print Your Name	Signature
15	Dwaine Underwood	Dwaine Underwood
16	Karolyn Thacker	Karolyn Thacker
17	Terry Crabtree	Terry Crabtree
18	Gleb Perlongo	Gleb Perlongo
19	Sabrina Perlongo	Sabrina Perlongo
20	Angie Givens	Angie Givens
21	Dwight Phillips	Dwight Phillips
22	Anthony Florio	Anthony Florio
23	Janice Blaylock	Janice Blaylock
24	Paul Brewer	Paul Brewer
25	Annette Brewer	Annette Brewer
26	Will Hoffert	Will Hoffert
27	Betty Newman	Betty Newman
28	H.L. Newman	H.L. Newman
29	LORENE THACKER	Lorene Thacker
30	Valrie McNeal	Valrie McNeal
31	Shirlene Phy	Shirlene Phy
32	Gary Key	Gary Key
33	Michael Powell	Michael Powell
34	Jimmy Blaylock	Jimmy Blaylock

Line No.	Please Print Your Name	Signature
55	Angie Harville	Angie Harville
56	Patricia Cass	Patricia Cass
57	Aisa Jones	Aisa Jones
58	Janet Hodge	Janet Hodge
59	Lana Richardson	Lana Richardson
60	Douglas Downs	Douglas Downs
61	Jay Borden	Jay Borden
62	Brenda Johnson	Brenda Johnson
63	Melissa Kelly	Melissa Kelly
64	Angela Scantland	Angela Scantland
65	Pam Bryant	Pam Bryant
66	Steven Maxwell	Steven Maxwell
67	Tim Stump	Tim Stump
68	Kim Barnhart	Kim Barnhart
69	Devona Huffman	Devona Huffman
70	Michelle Bowman	Michelle Bowman
71	Kristen Duncan	Kristen L. Duncan
72	Amy Cantrell	Amy Cantrell
73	Kati Loran	Kati Loran
74	Tracy Young	Tracy Young

Line No.	Please Print Your Name	Signature
75	Patricia Hardy	Patricia Hardy
76	Darris Honeycutt	Darris Honeycutt
77	DORCUS Willeford	Dorcus Willyford
78	PEGGY CONNER	Peggy Conner
79	Gwen Denton	Gwen Denton
80	JAMES WILLOFORD	James Willyford
81	Burt Sweet	Burt Sweet
82	Tracy Sweet	Tracy Sweet
83	Charles Stewart	Charles Stewart
84	Mike Copeland	Mike Copeland
85	Michaela Copeland	Michaela Copeland
86	Thomas K Copeland	Thomas Copeland
87	Terri S Copeland	Terri S Copeland
88	Malyne Copeland	Malyne Copeland
89	Amanda West	Amanda R. West
90	GARY M. WEST	Gary M. West
91	Nell West	Nell West
92	Anna R. Savier	Anna R. Savier
93	Harold C Dillon	Harold C Dillon
94	OSCO DILLON	Oscro Dillon

6

Line No.	Please Print Your Name	Signature
35	Joyce C. Daugherty	Joyce C. Daugherty
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Petition to Stop TVA Power Line

I strongly oppose the proposed TVA Power Line that will cross Buck Mountain. Buck Mountain is an area of great natural beauty and historical significance. The proposed power line will greatly damage this unique natural environment.

Name: Samantha Dominique Isbell

Address: 4525 Buck Mountain Road

Email (optional): queenizzy@frontier.net.net

Phone (optional): 931-537-9272

Additional Comments:

I do not want to see all the wildlife that we have affected by this power line. I would rather conserve energy and encourage others to do the same.

Send the completed form to:

Ada Haynes
4299 Buck Mountain Rd
Algood, TN 38506

adahaynes@hotmail.com

And to

Todd Moore
TVA Siting Engineer
1101 Market Street (MR 4G)
Chattanooga, TN 37402-2801

newtransline@tva.gov

Petition to Stop TVA Power Line

I strongly oppose the proposed TVA Power Line that will cross Buck Mountain. Buck Mountain is an area of great natural beauty and historical significance. The proposed power line will greatly damage this unique natural environment.

Name: PAUL & SANDRA Isbell
Address: 4399 Buck Mtn. Road
Email (optional): Luapllebsi@Yahoo.Com
Phone (optional): (931) 537-9733

Additional Comments:

The transmission line route as presently sited will do great damage to my property. I am not willing to allow this line on my property as it will destroy my view and destroy many beautiful trees.

Send the completed form to:

Ada Haynes
4299 Buck Mountain Rd
Algood, TN 38506

adahaynes@hotmail.com

And to

Todd Moore
TVA Siting Engineer
1101 Market Street (MR 4G)
Chattanooga, TN 37402-2801

newtransline@tva.gov



adahaynes@hotmail.com

Printed: Sunday, March 4, 2007 2:22 PM

From : Diane & Sam Glasgow <dianesamglasgow@gmail.com>
Sent : Tuesday, February 20, 2007 5:49 AM
To : "Ada Haynes" <adahaynes@hotmail.com>, newtransline@tva.gov
Subject : Petition to Stop TVA Power Line across Buck Mountain, TN

Petition to Stop TVA Power Line

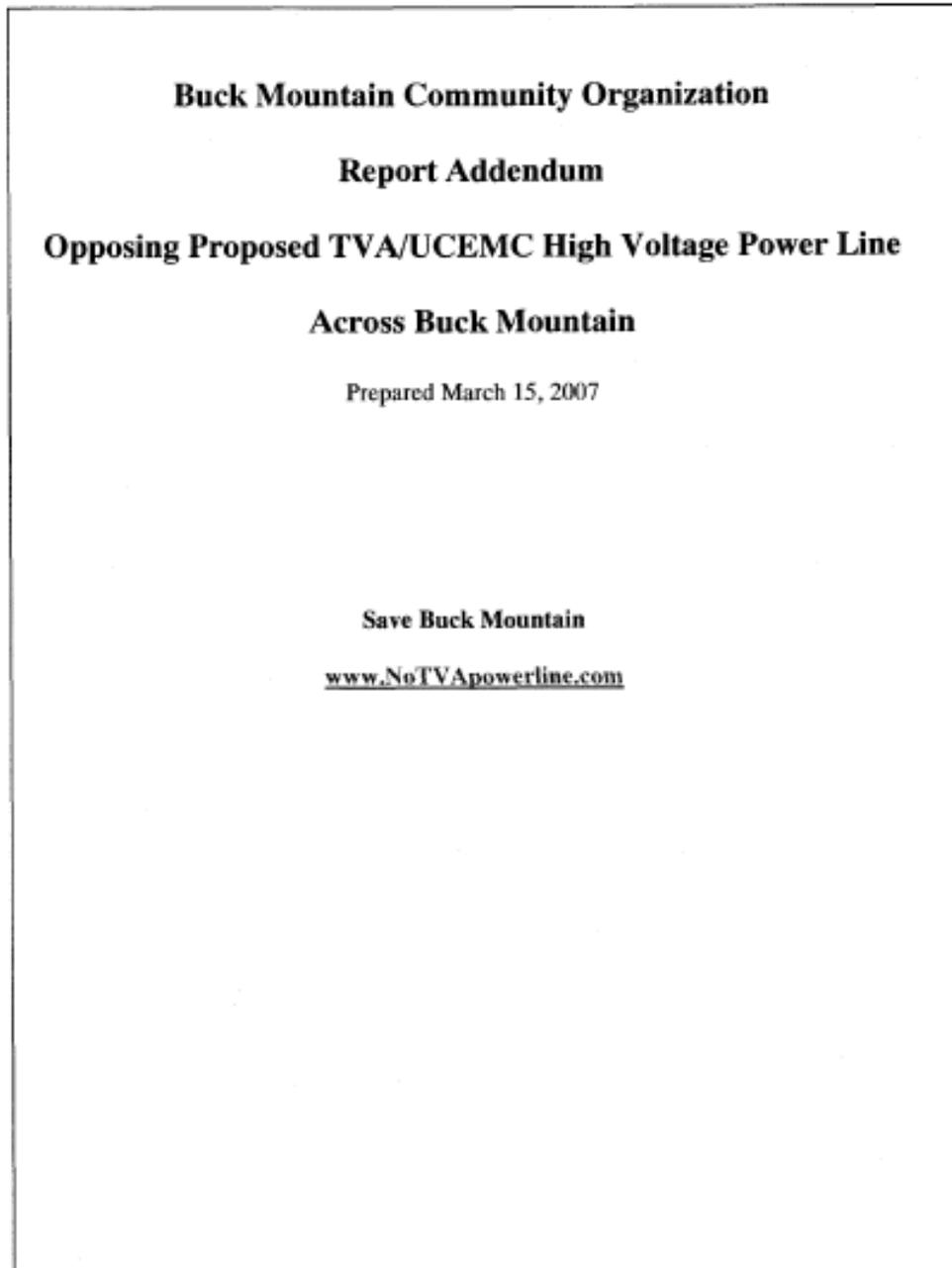
I strongly oppose the proposed TVA Power Line that will cross Buck Mountain. Buck Mountain is an area of great natural beauty and historical significance. The proposed power line will greatly damage this unique natural environment.

Name: Diane Glasgow

Address: 575 Timber Lane

Cookeville TN 38501

Email (optional): dianesamglasgow@gmail.com



Addendum to Original Report

This supplement to the original 100 page report contains information and documents that were either not available or unknown to us at the time the original report was submitted. We are submitting this addendum as additional documentation to support our opposition to the proposed transmission line across Buck Mountain and to request additional time to review planning reports, hold additional public hearings related to NEPA issues, and to consider alternatives.

We have still not been given access to the planning reports that justify the need for this project and the new transmission line despite repeated requests to obtain that information. We have included in the supporting documentation a formal request from our organization to UCEMC to obtain these reports and a Freedom of Information Request to obtain the documents from TVA.

We have also including additional documentation to support the concern about environmental impact and the need to consider alternatives.

Other information included in this report documents TVA procedures to comply with NEPA and makes clear that this project would not be excluded from Environmental Impact Studies in view of the cultural and historical resources involved, the environmentally significant resources, and the substantial controversy that has developed over the environmental impact.

5.2 Categorical Exclusions

An action which would normally qualify as a categorical exclusion shall not be so classified if: (1) **the proposed action could have a potentially significant impact on a threatened or endangered species, wetland or floodplain, cultural or historical resource, important farmland, or other environmentally significant resource;** or (2) **substantial controversy over the significance of the environmental impacts associated with the proposed action has developed or is likely to develop.**

From: Tennessee Valley Authority, Instruction IX Environmental Review, Procedures for Compliance with the National Environmental Policy Act.

After consultation with our environmental attorneys we are requesting that a public scoping hearing be held after a proper published notice (not an “Open House”) followed by a full Environmental Impact Statement and a public hearing on the draft EIS.

Additional Alternatives

Since the original report was submitted, we have also learned that the City of Cookeville can provide temporary power to the Algood substation (with assistance from TVA) while the existing Transmission line right-of-way is upgraded. This alternative will greatly reduce the cost of the project and the damage to the environment. It will also strengthen the power transmission infrastructure in the area. This alternative is supported by both the Mayor of Cookeville and U.S. Congressman Bart Gordon. The use of the existing right-of-way corresponds to the proposal originally approved by the Algood Planning Commission.

Supporting Documentation



Roaring River Chapter

Save Our Cumberland Mountains

**Quality of Life, Environmental Protection and
Community Defense for Overton, Putnam and
Jackson Counties in Tennessee.**

Mr. Todd Moore
Tennessee Valley Authority
1101 Market St., MR 4G
Chattanooga, TN 37402-1801

March 16, 2007

Re: Proposed New Algood - Buck Mountain Transmission Line.

Dear Mr. Moore,

These comments are made on behalf of the Roaring River Chapter of Save Our Cumberland Mountains. We are an active part of the statewide organization. Our chapter has more than one hundred members who live in our three county area.

Several of our members are affected by your proposal.

In our view, TVA has not followed correct procedures. The notice of the "open house" should have made it clear that this was hearing to take public comment on all of the environmental issues which TVA would later address in an assessment under the national Environmental Policy Act (NEPA). The TVA "open house" meeting did not make it clear that TVA is (or should be) involved in a step by step process to comply with NEPA.

Certainly the attitude and statements of TVA staff as described by several persons did not accurately describe the NEPA process and make it clear that there could be no agency decision until there was an environmental assessment and a finding as to significant impacts.

We believe that TVA should start over with a properly noticed hearing on the scope of issues to be addressed in a full Environmental Impact Statement. Other TVA assessments have recognized that power line installations may have a significant adverse affect on the human environment, a result that NEPA is

**Proposed New Algood or Buck Mountain Transmission Lines
March 16, 2007**

supposed to help us avoid.

We have reviewed some of the information on historical, cultural and environmental impacts submitted by concerned persons and organizations. There is ample evidence of substantial adverse impacts. Given the strongly held and well documented opposition to the proposal, we think it is best if TVA carefully follows the NEPA requirements.

One of the NEPA requirements is that a “no build” alternative be considered and that reasons to adopt this alternative be recognized and addressed. TVA should notify the public that this option is being considered and reopen or extend the comment period to allow public input on this alternative.

This is particularly important given TVA's heretofore unwillingness to release any accurate description of the purpose and need for the project as required by NEPA. As the federal courts have ruled, informed public participation in the NEPA process is only possible if a useable statement of purpose and need is included in the invitation to a NEPA related hearing and public comment process.

Nor has TVA offered any of the information or documents which UCEMC apparently supplied to TVA in support of the requested new, higher voltage line. (We are aware that it was previously represented to the Algood Planning Commission that the existing power line route via Cookeville would be used and no new right of way would be acquired.) There can be no adequate NEPA or cost benefit analysis performed without this information. Certainly any NEPA analysis is subject to court challenge if TVA and UCEMC continue to refuse to provide any documented support for the demand projections and the asserted need for the new power line.

(We note that the power line proposal is not subject to any categorical exemption under the TVA policies. There are both significant impacts and substantial controversy about this new line and there is no exemption of new as compared to relocated lines, as we read the TVA rules.)

**Proposed New Algood or Buck Mountain Transmission Lines
March 16, 2007**

Moreover, the extension of time to comment was not conveyed to those who attend the "open house" though these folks had registered and left contact information with your agency. We ask that you notify all those who attended the "open house" that the comment deadline has been extended and extend deadline for an additional 30 days. This is wholly consistent with our request that you reopen the process, making it clear that there is "no build" option on the table and that TVA will state explicitly and in detail the "purposes and need" for the project and provide the reports and data which allegedly support the perceived need.

Others have requested an extension of the comment deadline pending receipt of a report from a consultant with UCEMC justification of the need for this project. The chapter joins the request for an extension and asks that TVA make public any and all data and reports. We also request a copy of the reports at the earliest possible date. If necessary, please treat this as a request for public records under the Freedom of Information Action Act, 5 U.S.C. § 552 and following.

UCEMC may need to modernize its substation given the age of the equipment as asserted in a recent UCEMC publication. We support UCEMC in a decision to move to Smart Meters which will allow better focused conservation programs and charges which reflect the real, increased costs of peak generation.

We believe that the projections for increased demand should be set out in detail. Certainly the assumption of a 2 per cent per year increase which we have heard seems unlikely as Congress responds to climate change. For example the costs of coal fired electricity may increase substantially. See MIT's just released report on "*The Future of Coal*". <http://web.mit.edu/coal/> When combined with the 6th Circuit ruling in *NPCA v. TVA*, on reduction of emissions from TVA's coal fired plants, projections of peak time electricity costs must increase with a resulting reduction in the peak demand. And peak demand is the justification for the new higher, voltage line.

We believe that TVA (and UCEMC) have not adequately considered either conservation of distributed generation from renewable sources like solar. For example if the Tennessee Legislature passes SB 116 and we adopt the most

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**Proposed New Algood or Buck Mountain Transmission Lines
March 16, 2007**

recent energy efficiency standards for buildings, demand projections may look very different.

Likewise energy use will be lower if we adopt Energy Star appliance requirements as is proposed in other legislation.

There is certainly a lot of room for conservation and efficiency gains while we are among the highest in the nation per capita energy use.

We are told that TVA will soon offer a new energy policy statement. We plan to participate in the public comment on this policy. We hope that this policy will expand TVA's commitment to conservation and renewable energy sources. TVA must revise the energy demand forecasts and suggest alternatives to an endless expansion of generation and grid transmission.

We believe that the new realities of climate change with carbon emission charges and restrictions and the loss of federal subsidies for nuclear generation which will likely occur in the next few years mean TVA needs to stop "business as usual" and that fully evaluating the need for this power line is a first step.

Sincerely

Brian Paddock
for the Roaring River Chapter of Save Our Cumberland Mountains

Please reply to:
360 Roberts Hollow LN.
Cookeville, TN. 38501



March 15, 2007
Electronically - Hard Copy to Follow

Todd Moore
TVA
1101 Market St., MR 4G
Chattanooga, TN 37402-1801

Re: New Algood Transmission Lines & Substation Upgrade

Dear Mr. Moore:

Please accept these comments on behalf of the Upper Cumberland Group of the Sierra Club on the above project.

We are opposed to the addition of these new lines. We question the need for these new lines and the upgrade.

We are particularly concerned that the additional lines and substation capacity will have an adverse effect and cumulative indirect impact on global warming by encouraging more growth and electricity usage at a time when scientists globally are warning that we must sharply decrease our fossil fuels emissions in order to have a habitable planet for our children and grandchildren. We ask that the enclosed copy of the recently released Interplanetary Panel on Climate Change report be included in the record for NEPA review for this project.

We urge TVA and UCEMC to develop with their customers energy conservation programs, rather than this support of additional fossil fuel use.

We believe there are significant impacts to the environment from this project and that a full environmental impact statement should be done. There are significant environmental resources in the area. This is a controversial project, with much public opposition. This is not a minor project, nor are its impacts minor.

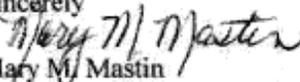
We are concerned that the routes for the new lines traverse either large areas of contiguous mixed

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hardwood forest, with many sinkholes and caves holding native American artifacts and possibly a globally rare species of cave flatworm- or that an alternative route impacts on a significant wetland. Both major alternative route appear to cross historic properties.

We understand that a request for an extension of the comment deadline has been made pending receipt of a report from a consultant with UCEMC/TVA's justification of the need for this upgrade/project. We join in the request for an extension and ask that TVA make public the report. We also request a copy of the report.

Sincerely



Mary M. Mastin

Conservation Chair, Upper Cumberland Group
Sierra Club

PADDOCK & MASTIN
Attorneys at Law
360 Roberts Hollow LN.
Cookeville, TN. 38501
931-268-2938 (Phone & Fax)

BART GORDON
8TH DISTRICT, TENNESSEE

COMMITTEES:
ENERGY AND COMMERCE
HEALTH
TELECOMMUNICATIONS
AND THE INTERNET

SCIENCE
HAWKING MEMBER



**Congress of the United States
House of Representatives**

February 28, 2007

2204 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20516-4308
(202) 226-4321
FAX: (202) 226-4867

306 WEST MAIN STREET
P.O. BOX 1989
MURFREESBORO, TN 37130
(615) 895-1993
FAX: (615) 898-6218

15 SOUTH JEFFERSON STREET
P.O. BOX 1149
COOKEVILLE, TN 38501
(615) 528-8807

100 PUBLIC SQUARE
ROOM 8-105
GALLATIN, TN 37068
(615) 451-8174

Barry Stein
4299 Buck Mountain Road
Cookeville, Tennessee 38501

Dear Barry,

Knowing you are a potentially affected landowner on one of the routes for the new Tennessee Valley Authority transmission line to Algood, I wanted to update you on my actions on this issue.

Like you, I am concerned about the routing of the new transmission line in Putnam County. While I understand the need for an upgrade of the current Upper Cumberland Electric Membership Cooperative substation, I am concerned the routing of the new transmission line will significantly impact private property and the environment.

TVA appears to have ruled out using existing rights-of way which would have less environmental impact. I have asked TVA to reconsider existing rights-of way and to extend the public comment period for the project so that residents can have additional time to review and comment on the proposal.

If you have not already, I would encourage you to contact Todd Moore, Tennessee Valley Authority, 1101 Market Street. (MR 4G), Chattanooga, TN 37402-2801. You can call toll free 1-800-362-4355, or email newtransline@tva.gov. Detailed information about the project can be found at the TVA website: www.tva.com/power/projects. I also have a large detailed map of the proposed routes available for viewing in my office at 15 South Jefferson Street in Cookeville.

Again, I will continue to keep you updated on my efforts on this issue. Meanwhile, please call on me if I may be of service to you or your family.

Sincerely

BART GORDON
Member of Congress

BJG/js

Internet: <http://www.house.gov/bart>



**House of Representatives
State of Tennessee**

LEGISLATIVE OFFICE:
109 WAR MEMORIAL PLAZA
NASHVILLE, TN 37243-0142
PHONE (615) 741-1875
FAX (615) 253-0160
1-800-449-8366 ext. 11875
rep.henry.finch@legislature.state.tn.us

**HENRY FINCHER
ASSISTANT MAJORITY WHIP
REPRESENTATIVE 42ND DISTRICT**

MEMBER OF COMMITTEES:
JUDICIARY
TRANSPORTATION

DISTRICT OFFICE:
305 EAST SPRING STREET
COOKEVILLE, TN 38501
PHONE (931) 528-4000

March 9, 2007

Ms. Susan Richardson Williams
TVA BOARD
400 Summit Hill Drive
Knoxville TN 37902

Re: Algood, TN power line extension

Dear Ms. Williams:

I represent the area where the above-referenced power line extension is planned to begin in the near future. Several of my constituents have voiced strong opinions on this issue, with the common concern that they feel their concerns have not been properly addressed.

I understand that the Authority has held a public meeting, and the Public Relations arm of the Authority has spoken with the elected representatives of the area, and I appreciate this outreach. However, I think more can be done and I respectfully request that the Authority schedule an additional sit down meeting between a representative of the Authority with decision-making power over this project and the citizens involved with the Buck Mountain Community Organization to discuss TVA power lines, openness, disclosure and alternatives to this project.

To set up this meeting, please contact Dr. Ada Haynes, 4299 Buck Mountain Road, Cookeville TN 38501, call her at (931) 372-3815, or you can email her at ahaynes@tntech.edu. If you have any questions or comments, please call me.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'H. Fincher', with a long horizontal flourish extending to the right.

Henry D. Fincher
State Representative

CC: Congressman Bart Gordon
Congressman Lincoln Davis
Senator Lamar Alexander
Mr. and Dr. Barry Haynes



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1401

March 13, 2007

Paul Isbell
4399 Buck Mountain Road
Cookeville, TN 38506

Dear Mr. Isbell:

This is in regard to your request under the Freedom of Information Act (FOIA), 5 U.S.C. § 552 (2000) dated February 26, 2007. You requested information pertaining to the proposed power supply upgrade to the Algood Substation in the Cookeville, Tennessee area.

We regret that your request cannot be completed within 20 business days from its receipt due to the need to search for and review records from various TVA offices separate from this one. In addition, some of the information you requested may contain confidential commercial or financial information submitted to TVA from an outside source. FOIA exemption 4 protects such information from disclosure if the release of such records would likely cause substantial competitive harm to the person who submitted it.

We have followed our normal practice and have provided the submitter an opportunity to identify information in the requested records that they consider competitively sensitive, and to file objections and arguments regarding the disclosure of such records. Once we have received their comments and completed our review of the responsive records, copies will be provided to the extent permitted by FOIA.

In fairness to all our requesters, the FOIA requests which cannot be answered within 20 workdays are placed in the multi-track system in accordance with TVA's FOIA regulations, 18 C.F.R. § 1301.5, and are generally answered in the order we receive them. Your request has been placed in Track 2. The processing time will depend on the number and complexity of the requests received before yours.

If you have any questions or would like to discuss your request, you may contact me at (865) 632-6945 or by email to dsmith@tva.com.

Sincerely,

A handwritten signature in black ink that reads "Denise Smith".

Denise Smith
TVA FOIA Officer



Tennessee Valley Authority, One Massachusetts Avenue, NW, Suite 300, Washington, DC 20444

Justin Maierhofer
Director
Government Relations

March 16, 2007

Dr. Ada Haynes
4299 Buck Mountain Road
Algood, Tennessee 38506

Dear Dr. Haynes:

This is in response to your comments concerning the Tennessee Valley Authority's (TVA) transmission line project in Algood, Tennessee.

The Algood area is experiencing significant residential and commercial growth. Studies commissioned by Upper Cumberland Electric Membership Corporation (UCEMC) show this increase demand for electricity will overload existing power facilities by summer 2008. To help meet the demand, UCEMC plans to upgrade the 69-kV Algood Substation to 161-kV. TVA must build about five miles of new 161-kV transmission line to provide power to the upgraded substation.

TVA initially considered and eliminated routes other than the one selected for the reasons noted below:

Highway 111 - TVA and the Tennessee Department of Transportation (TDOT) have always worked together concerning the shared use of highway right-of-way (ROW). We considered and eliminated the Highway 111 corridor early in the evaluation process. Sharing a ROW with an existing highway is considered only when there are no other desirable options available. Other factors which contributed to the elimination of the Highway 111 option included the following:

- A transmission line represents a major investment. To protect TVA's investment (construction, operation, maintenance, and safety), a dedicated ROW is necessary.
- Any future road work resulting in relocation of the transmission line would be at TVA's expense.
- Locating transmission structures near vehicular traffic exposes them to greater risk of being damaged, resulting in power outages to the area.
- The Highway 111 alternative would be longer and would impact more parcels, businesses, and residences.
- The constraints posed by the development at two interchanges.

Dr. Ada Haynes
Page 2
March 16, 2007

- The environmental concerns regarding impacts to several wetland areas.
- Due to the nature of the rugged terrain, there is not an acceptable location for a tap point on the South Cookeville-Monterey 161-kV transmission line in the vicinity of Highway 111.

Existing ROW – Under one alternative route option, TVA's plan is to share a portion of the exiting ROW as it enters the Algood Substation site. However, use of the entire ROW is not a feasible alternative. The line presently serving the Algood Substation site is the only source of power to the Algood Substation and cannot be taken out of service to build the new transmission line on the existing ROW. Paralleling the existing ROW is not a desirable option because it would:

- Result in greater impacts to a larger number of property parcels and owners.
- Cause the possible relocation of homes and businesses.
- Be in close proximity to a school.
- Result in impacts to wetland areas.

Old Kentucky Road and Rail Road - Use of either of these alternative corridors would:

- Result in additional line length.
- Impact a larger number of property parcels and owners.
- Cause the possible relocation of homes and businesses.

TVA extended the comment period for this project until Friday, March 16, 2007. We are currently reviewing all the public comments and additional information gathered during the comment period to help determine a preferred route.

If you need more information concerning this project, please contact Todd Moore, Location Engineer, toll-free at 800-362-4355; write him at TVA, 1101 Market Street (MR 4G), Chattanooga, Tennessee 37402-2801; send an email to newtransline@tva.gov; send fax to 423-751-4098; or visit our website at www.tva.com/power/projects.htm.

Sincerely,



Justin Maierhofer
Director, Government Relations

cc: The Honorable Lamar Alexander
United States Senator
455 Dirksen Senate Office Building
Washington, DC 20510

Hannah & Hannah Geologists
P.O. Box 49314
Algood, Tennessee 38506

March 2, 2007

Mr. Barry Stein
4299 Buck Mt. Road
Algood, TN 38506

Re: Proposed TVA Route (1)

Dear Mr. Stein:

As we discussed February 25, 2007 during my visit to the proposed powerline route, possible groundwater impacts may result from chemical spraying if the powerline is constructed at the location proposed. The route in question crosses several karst features located between the Hartselle Sandstone /Monteagle contact at the edge of the plateau and the base of the valley. In particular, the 70-foot pit at the contact of the Hartselle/Monteagle contact is a direct conduit for contamination to enter the water table. This is also true of the numerous sinkholes we viewed next the proposed route along the escarpment.

Typically the Hartselle Sandstone acts as an aquitard, which allows water to collect on top of the unit. Water flows across the unit until it intercepts the escarpment. Water then drops into the Monteagle, a very clean, thick-bedded limestone. Localized karstic joints and pits then provide conduits for the water to migrate to the valley floor. This water typically emerges in the St. Louis or lower Monteagle as a spring. It may also directly recharge the local aquifer. In karst areas, any chemical contaminant, or increased turbidity will cause degradation of the groundwater.

Sincerely,


Elwin Hannah
Professional Geologist
TN PG #278

Buck Mountain Community Organization

Date: March 9, 2007

To: Carl Brandt and all Directors of UCEMC

Subject: Formal Request for Reports Related to Algood Substation & New Transmission Line

UCEMC and TVA have repeatedly cited several reports that were done by independent consulting firms as the basis for the proposed expenditures of UCEMC and TVA funds on upgrades to the Algood substation and a new transmission line to supply that substation. We would like to review those documents so that we can better understand the rationale for this project.

As members of the Upper Cumberland Electric Membership Corporation, we are formally requesting copies of all reports related to the proposed expansion of the Algood substation and the new transmission line that is needed to supply the upgraded substation. We request that you send these reports so that we will have least 3 days before the end of the comment period for the proposed TVA transmission line (March 16, 2007) to review the documents and respond.

Please respond to our representative: Ada Haynes, 4299 Buck Mountain Road, Algood, TN 38506

CC: Senator Lamar Alexander, Senator Bob Corker, Representative Bart Gordon, Representative Lincoln Davis, State Senator Charlotte Burks, State Representative Henry Fincher

This message is not flagged. [Flag Message - Mark as Unread]

Printable Vie

Date: Mon, 26 Feb 2007 13:05:02 -0800 (PST)

From: "paul isbell" <luapllebsi@yahoo.com>  Add to Address Book  Add Mobile Alert

Subject: FOIA Request

To: DSMITH@TVA.com

TVA FOIA Officer
Denise Smith
400 West Summit Hill Dr. WT7D
Knoxville, TN 37902-1499

Dear Ms. Smith:

Pursuant to the Freedom of Information Act, I am requesting a copy of a study conducted on behalf of either TVA or UCEMC pertaining to the Proposed Power System Improvements for Algood Tennessee. The study addresses the proposed upgrade of the Algood Substation from 69-kV to 161-kV and the construction of approximately five miles of new 161kV transmission line. It is my understanding that the study validates the need for the additional power.

Please provide any additional documents that contain information relative to discussions of alternatives to the new lines such as distributive power, green power, conservation, etc. Also please provide any documents or information on the rationale for the proposed routes of the new lines to include considerations for using the existing transmission line right-of-way or other routes.

Sincerely,

Paul R. Isbell
4399 Buck Mtn. Road
Cookeville, TN 38506

*Copy of
FOIA request
you asked for.*

Alternatives to Additional High-Voltage Overhead Power Lines

Prit Chowdhuri

March 9, 2007

Additional power lines are needed if the power handling capability of the existing line is exceeded. The power handling capability of an a.c. line is determined by: (a) thermal limit, and (b) stability limit. The stability limit is generally reached first. The steady-state stability limit is proportional to the square of the voltage. As an example, the power rating of the present line can be increased four times by doubling its voltage. Of course, the line has to be redesigned to carry the higher voltage. In other words, four power lines can be replaced by one power line of double the voltage. Therefore, the present power line can be upgraded to a power line of higher voltage, suitable for the required power. Naturally, the width of the power line of higher voltage will be larger. However, this width can be optimized by proper design of the line. The upgraded line will, in general, be less expensive than four power lines of lower voltage.

A power line on a mountain will be subject to more lightning strikes, and the consequent increase of power outages. Grounding the shield wires will also be expensive because of the rocky soil.

It is the general norm, in and around inhabited areas, to transmit power by underground cables. Overhead power lines are prohibited in most urban areas. Underground cables will also significantly increase the reliability level by decreasing the outage rates which an overhead power line normally endures. Surge protectors at either ends of the underground cable should be properly designed and installed. The initial cost of the underground cable will be significantly higher. However, this initial cost will be recovered eventually by higher reliability. Of course, no cost can be assigned to the aesthetic and environmental benefits of eliminating an overhead power line.

Paul R. Isbell
4399 Buck Mountain Road
Cookeville, TN 38506

March 14, 2007

Mr. William Sansom
Tennessee Valley Authority
400 W. Summit Hill Drive
Knoxville, TN 37902-1499

Dear Mr. Sansom:

I am writing about the electrical sub-station upgrade and new high voltage transmission line being proposed for Algood, Tennessee. I am one of the people who have been questioning the need for this project.

One of the proposed routes for the new transmission line will severely affect my property and home. I worked many years in order to build my home and have recently retired only to now realize that it is all in jeopardy. I have requested information about this project from both TVA and Upper Cumberland Electric Membership Co-operative (UCEMC) and have received nothing.

I have looked at the proposed routes for the new transmission line and cannot understand the logic behind the choices. Whoever selected the routes obviously knew very little about the terrain or the impact on private property and environmental concerns that will result from the project. There are numerous other routes available that would have far less impact than the ones currently proposed.

I am especially interested in how anyone came up with route #1 which goes up Buck Mountain, across the mountain, and back down the mountain. This route defies all logic considering the added length, extremely rugged terrain and environmental impact that

would result. The only reason I can envision for this Buck Mountain route is that other proposed routes cross property owned by board members of the UCEMC.

The lack of communication from UCEMC and TVA concerning this project has been appalling. Our requests for information and answers have been ignored and we have been treated like we aren't important enough to be considered. An open dialog would certainly improve the situation and enhance the success of this project to the benefit of everyone.

I am requesting that TVA and UCEMC officials delay this project and meet with all affected and concerned citizens to answer our questions and concerns.

Sincerely,

Paul R. Isbell



adahaynes@hotmail.com

Printed: Friday, March 16, 2007 2:39 AM

From : Williams <todw@frontiernet.net>
Sent : Friday, March 16, 2007 1:45 AM
To : <newtransline@tva.gov>
Subject : Cookeville upgrade comments

I would like to voice my opposition to the Brotherton Mountain option to your proposed upgrade.

I of course have a personal reasons for this and understand that no matter what route is chosen, property owners will be effected.

I recently purchased a building lot in Plantation View, the subdivision on the right as you crest the top of Brotherton Mountain. I felt like it would be a good investment no matter what. I considered building there or just holding it for a while to see how the subdivision developed. I unfortunately never imagined the "no matter what" might include a TVA power line running through the middle of a subdivision. It appears that is exactly what your number one option proposes to do.

As I mentioned, I understand the negative impact growth sometimes has on property owners. I'm as anti-NIMBY as they come and don't plan on making too much a hypocrite of myself now. However it does appear that the alternate options have less of an effect by following an already established right-of-way in part and then running along buggar swamp, an arguably hard to develop property, and the base of Buck Mountain, what would appear to be less expensive, and also cover less total ground. I do understand an UCEMC board member is effected by that route but as I said, someone is going to be and it wouldn't be right to let that influence the decision to not follow a more direct and cost effective approach.

So let my primary argument be for a less costly route than traversing two mountains. But also, a route that has less of an effect on undeveloped land. Land that in my case was purchased as an investment in a subdivision and that in all likelihood will be reduced in value. Land that along the ridge bordering Paragon Rd provides some of the most beautiful views overlooking our city. Please don't come up the mountain. Please find some alternatives for any new lines if possible.

Thank You,

Tod Williams

Petition to Stop TVA Power Line

I strongly oppose the proposed TVA Power Line that will cross Buck Mountain. Buck Mountain is an area of great natural beauty and historical significance. The proposed power line will greatly damage this unique natural environment.

Name: *Mary Lefave* *Chad Lefave*
Address: *957 Mountain Top LN*
Cookeville, TN 38506
Email (optional):
Phone (optional): *931-537-3910*

Additional Comments:

Please consider putting power lines on Hwy 111 and across Main st Algood where it would infringe less upon residences and natural habitats. Thanks

Send the completed form to:

Ada Haynes
4299 Buck Mountain Rd
Algood, TN 38506

adahaynes@hotmail.com

And to

Todd Moore
TVA Siting Engineer
1101 Market Street (MR 4G)
Chattanooga, TN 37402-2801

newtransline@tva.gov

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**PROCEDURES FOR COMPLIANCE WITH THE
NATIONAL ENVIRONMENTAL POLICY ACT**

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1.0 Purpose

These procedures provide guidance for compliance by the Tennessee Valley Authority (TVA) with the National Environmental Policy Act (NEPA), 42 U.S.C. 4321, et seq. (1976) and other applicable guidelines, regulations, and Executive orders implementing NEPA. It is intended to incorporate concepts and implement policies in the regulations promulgated by the Council on Environmental Quality at 40 CFR, parts 1500-1508 (1981).

2.0 Policy

TVA, to the fullest extent possible, incorporates environmental considerations into its decision making processes. In carrying out this policy, these procedures ensure that actions are viewed in a manner to encourage productive and enjoyable harmony between man and the environment. Commencing at the earliest possible point and continuing through implementation, appropriate and careful consideration of the environmental aspects of proposed actions is built into the decision making process in order that adverse environmental effects may be avoided or minimized, consistent with the requirements of NEPA.

3.0 Abbreviations

- 3.1 CEQ - Council on Environmental Quality
- 3.2 EA - Environmental Assessment
- 3.3 EIS - Environmental Impact Statement-D-Draft; F-Final
- 3.4 NEPA - National Environmental Policy Act
- 3.5 TVA - Tennessee Valley Authority

4.0 Definitions

The following definitions shall apply throughout these procedures. All other applicable terms shall be given the same meaning as set forth in CEQ's currently effective regulations (see 40 CFR regulations, part 1508) unless otherwise inconsistent with the context in which they appear.

- 4.1 "Floodplain" refers to the lowland and relatively flat areas adjoining flowing inland waters and reservoirs or to those areas inundated by the unusual or rapid accumulation or runoff of surface waters from any source. Floodplain generally refers to the base floodplain, i.e., that area subject to a 1 percent or greater chance of flooding in any given year. A flood having a 1 percent chance of occurring in any given year is usually referred to as a 100-year flood.
- 4.2 "Natural and beneficial floodplain and wetland values" refer to such attributes as the capability of floodplains and wetlands to provide natural moderation of floodwaters, water quality maintenance, fish and wildlife habitat, plant habitat, open space, natural beauty, scientific and education study areas, and recreation.
- 4.3 "Practicable" refers to the capability of an action being done within existing constraints. The test of what is practicable depends on the situation involved and should include an evaluation of all pertinent factors, such as environmental impact, economic costs, technological achievability, and public benefit.
- 4.4 "Wetlands" are those areas inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances do or would support, a prevalence of vegetation or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, mud flats, and natural ponds. Wetlands do not include temporary human-made ponds, sloughs, etc., resulting from construction activities.

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- 4.5 "Important farmland" includes prime farmland, unique farmland, and farm land of Statewide importance as defined in 7 CFR, part 657 (1981).

5.0 Procedures

5.1 Action Formulation and NEPA Determination

Each office within TVA is responsible for integrating environmental considerations into its planning and decision making process at the earliest possible time to ensure that potential environmental effects are appropriately considered to avoid potential delays and to minimize potential conflicts. Environmental analyses are to be included in or circulated with and reviewed at the same time as other planning documents. This responsibility is to be carried out in accordance with the environmental review procedures contained herein.

The General Manager and Board of Directors are the major decision points within the agency for TVA's principal programs that are likely to have a significant effect on the quality of the human environment. Alternatives considered by the General Manager and Board of Directors shall be encompassed by the range of alternatives discussed in relevant environmental documents, and the General Manager and Board of Directors shall consider the alternatives described in relevant EISs.

At the earliest possible time, the office proposing to initiate an action will initially determine the level of environmental review required for a specific action. The level of review will be in one of the following categories:

	<u>Procedure</u>
Categorical Exclusions	5.2
Environmental Assessments	5.3
Environmental Impact Statements	5.4

5.2 Categorical Exclusions

Categories of actions listed in this section are those which do not normally have, either individually or cumulatively, a significant impact on the quality of the human environment and require neither the preparation of an EA nor an EIS. The office proposing to initiate an action shall determine, in consultation with the Environmental Quality Staff as appropriate, whether or not the proposed action is categorically excluded. An action which would normally qualify as a categorical exclusion shall not be so classified if: (1) the proposed action could have a potentially significant impact on a threatened or endangered species, wetland or floodplain, cultural or historical resource, important farmland, or other environmentally significant resource; or (2) substantial controversy over the significance of the environmental impacts associated with the proposed action has developed or is likely to develop. Categorical exclusion actions are:

1. Routine operation, maintenance, and minor upgrading of existing TVA facilities.
2. Technical and planning assistance to State and local organizations.
3. Personnel action.
4. Procurement activities.
5. Accounting, auditing, financial reports, and disbursement of funds.
6. Contracts or agreements for the sale, purchase, or interchange of electricity.

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7. Activities related to the promotion and maintenance of employee health.
8. Activities of TVA's Equal Employment Opportunity staff.
9. Administrative actions consisting solely of paperwork.
10. Communication, transportation, computer service, and other office services.
11. Property protection, law enforcement, and other legal activities.
12. Emergency preparedness.
13. Preliminary planning, studies, or reviews consisting of only paperwork.
14. Exploration for uranium, including hydrologic investigations.
15. Preliminary onsite engineering and environmental studies for future power generating plants and other energy-related facilities.
16. Establishment of environmental quality monitoring programs and field monitoring stations.
17. Transmission line relocation, tap-ins, or modifications or substation alterations due to conflicts such as new highway projects and projects requiring acquisition of minor amounts of additional substation property or transmission line right-of-way easements.
18. Construction and operation of communication facilities (i.e., powerline carrier, insulated overhead ground wire, VHF radio, and microwave).
19. Backslope agreements involving properties on which TVA holds an interest between operators and other adjacent mining companies.
20. Purchase, exchange, lease or sale, or lease purchase of stepdown facilities, transmission lines, and transmission line rights of way by distributors or customers directly served by TVA.
21. Minor research, development, and joint demonstration projects.
22. Construction of visitor reception centers.
23. Development of minor TVA public use areas and stream access points.
24. Minor non-TVA activities on TVA property authorized under contract or license, permit and covenant agreements, including utility crossings, encroachments, agricultural uses, rental of structures, and sale of miscellaneous structures and materials from TVA land.
25. Purchase, sale, abandonment or exchange of minor tracts of land, mineral rights, or landrights.
26. Approvals under Section 26a of the TVA Act of minor structures, boat docks, and shoreline facilities.
27. Any action which does not have a primary impact on the physical environment.
28. Actions which were the subject of an EA which concluded that the category of such actions should be treated as a categorical exclusion.

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5.3 Environmental Assessments

5.3.1 Purpose and Scope

An EA will be prepared for any appropriate action not qualifying as a categorical exclusion to determine whether an EIS is necessary or a Finding of No Significant Impact should be reached. An EA is not necessary if it has been determined that an EIS will be prepared.

5.3.2 Public Participation in EA Preparation

The Environmental Quality Staff or the initiating office, in consultation with the Environmental Quality Staff, Citizen Action Office, and other interested offices, may request public involvement in the preparation of the EA or a revision or supplement thereof. The type of and format for public involvement would be selected as appropriate to best facilitate timely and meaningful public input to the EA process.

5.3.3 EA Preparation

The initiating office is responsible for the preparation of the EA. As soon as practical after the decision to prepare an EA is made, the initiating office in consultation with the Environmental Quality Staff shall determine the need for a coordination meeting to define (1) reasonable alternatives, (2) permit requirements, (3) coordination with other agencies, (4) environmental issues, and (5) a schedule for EA preparation.

The EA will include the identification and, as appropriate, discussion of questions and concerns raised during the public input period, if any. The EA will describe the proposed action and will include brief discussions of the need for the proposed action, reasonable alternatives, the environmental impacts of the proposed action and alternatives, measures (if any) to minimize or mitigate such impacts, and a listing of the agencies and persons consulted. A list of required permits and environmental commitments will be circulated with the EA.

The EA will briefly provide sufficient data and analysis for determining whether to prepare an EIS or a Finding of No Significant Impact. The EA will be reviewed by the Environmental Quality Staff and other interested offices. After completion of the review, the Environmental Quality Staff will, in consultation with the Office of the General Counsel, make one of the following determinations: (1) the action does not require the preparation of an EIS, (2) the action will require the preparation of an EIS, or (3) the EA is incomplete or the decision will be deferred until a later stage in the planning process. Measures (if any) to minimize or mitigate impacts committed to in the EA will be implemented as described in section 5.5 (Mitigation Commitment Identification, Auditing, and Reporting).

5.3.4 Finding of No Significant Impact

If it is concluded, based on an EA, that a proposed action does not require the preparation of an EIS, the Environmental Quality Staff, in consultation with the Office of the General Counsel and the initiating office, will prepare a Finding of No Significant Impact.

Appropriate notice of Finding of No Significant Impact shall be made available to the public by the Environmental Quality Staff.

In the following circumstances, the Environmental Quality Staff, in consultation with the Office of the General Counsel and the initiating office, will make a Finding of No Significant Impact available for public review and comment (including, if appropriate, State and regional A-95

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clearinghouses or other designated State/local coordination points) for a period of time (normally 30 days) before a final determination is made as whether or not to prepare an EIS and before the proposed action may begin:

1. The proposed action is, or is closely similar to, an action listed in section 5.4.1
2. TVA has previously announced that the proposed action would be the subject of an EIS.
3. The nature of the proposed action is one without precedent.

5.3.5 Generic EAs

For any category of actions not described in section 5.2 (Categorical Exclusions), the initiating office may prepare a generic EA. The generic EA will be prepared, reviewed, and approved as would any other EA. Upon completion of review, the Environmental Quality Staff, in consultation with the Office of the General Counsel, will determine whether or not the category of actions may normally be treated as if listed in section 5.2 as a categorical exclusion.

5.3.6 Revisions and Supplements

If new information concerning action modifications, alternatives, or probable environmental effects becomes available, the initiating office, in consultation with the Environmental Quality Staff and the Office of the General Counsel, will consider preparing a revision or supplement to the EA based on the significance of the new information.

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5.4 Environmental Impact Statements

5.4.1 Purpose and Scope

The following actions normally will require an environmental impact statement:

1. Large water resource development and water control projects.
2. Major power generating facilities.
3. Uranium mining and milling complexes.
4. Any major action, the environmental impact of which is expected to be highly controversial.
5. Any other major action which will have a significant effect on the quality of the human environment.

An EIS should include a description and an analysis of the proposed action; alternatives to the proposed action, including the no-action alternative; probable environmental impacts associated with the proposed action and measures (if any) to minimize impacts; and a list of the major preparers of the EIS. The scope and detail of the EIS should be reasonably related to the scope and the probable environmental impacts of the proposed action and alternative actions (see 40 CFR, parts 1502.10-1502.18).

5.4.2 Lead and Cooperating Agency Determinations

As soon as possible after the decision is made to prepare an EIS, the Environmental Quality Staff, in consultation with the initiating office and the Office of the General Counsel, shall consider requesting other Federal, State, or local agencies to participate in the preparation of the EIS as lead, joint lead (see 40 CFR 1501.5), or cooperating agencies (see 40 CFR 1501.6). If TVA is requested to participate in the preparation of another Federal agency's EIS, the General Manager will determine if TVA will become a cooperating agency.

5.4.3 Scoping Process

As soon as possible after the decision to prepare an EIS is made, the initiating office will organize a scoping committee to tentatively identify action alternatives, probable environmental issues and environmental permits, and a schedule for EIS preparation. The scoping committee will consist of representatives of the Environmental Quality Staff, the initiating office, the Office of the General Counsel, Citizen Action Office, and other interested or affected offices.

The scoping process may include interagency scoping sessions to coordinate an action with and obtain inputs from other interested agencies, and public scoping sessions to obtain input from interested members of the general public. The scoping committee will determine the need, nature, and format for the various scoping sessions. Session type and format will be selected to facilitate timely and meaningful public input into the EIS process.

As soon as practicable in the scoping process, the initiating office will prepare and the Environmental Quality Staff, in consultation with the Office of the General Counsel, will review and make available a Notice of Intent to Prepare an EIS. This notice will briefly describe the action, reasonable alternatives thereto, and potential environmental impacts associated with the action. In addition, those issues which tentatively have been determined to be insignificant and which will not be discussed in detail in the EIS may be identified. The scoping process will be

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described and, if a scoping meeting will be held, the notice should state where and when the meeting is to occur. The notice will identify the person in TVA who can supply additional information about the action and to whom comments should be sent. There will normally be a public input period of 30 days from the date of publication of the Notice of Intent in the *Federal Register* to allow other interested agencies and the public an opportunity to review the action alternatives and probable environmental issues identified by the scoping committee. On the basis of input received, the Environmental Quality Staff, in consultation with the scoping committee, may determine what, if any, additions or modifications in the scoping process or schedule are required and establish the scope of the EIS.

At the close of the scoping process, the Environmental Quality Staff, in consultation with the scoping committee, will identify in writing the following EIS components:

1. Key action alternatives.
2. Significant environmental issues to be addressed in detail.
3. Probable nonsignificant environmental issues that should be mentioned but not addressed in detail.
4. Lead and cooperating agency assignments, if any.
5. Related environmental documents.
6. Other environmental review and consultation requirements.
7. Delegation of DEIS work assignments to interested offices.

5.4.4 DEIS Preparation

Based on information obtained and decisions made during the scoping process, the initiating office, in consultation with the Environmental Quality Staff and other interested offices, will prepare the preliminary DEIS using an appropriate format (see 40 CFR 1502.10). In addition, a list of required permits and an environmental commitment list will be prepared and circulated with the DEIS. The preliminary DEIS will be circulated by the initiating office to the Environmental Quality Staff, the Office of the General Counsel, and other interested offices for review and comment. All reviewing offices will, as soon as practical and normally within 30 days, supply comments on the preliminary DEIS to the initiating office, the Environmental Quality Staff, and the Office of the General Counsel. These comments will include lists of agencies, A-95 contacts or other State/local coordination points, and groups and individuals (both proponents and opponents, if any, of the proposed action) who should receive a copy of the DEIS. After the preliminary DEIS is revised, the initiating office will transmit it to other interested offices for their final approval. The Environmental Quality Staff will, in consultation with the Office of the General Counsel, review the document and transmit it and the commitment list to the General Manager for approval.

5.4.5 DEIS Transmittal and Review

Upon notification of approval from the General Manager, TVA will transmit the DEIS and appropriate notices to the Environmental Protection Agency (EPA) and other interested Federal, State, and local agencies (including State and regional A-95 clearinghouses or other State/local coordination points). The Citizen Action Office will coordinate overall DEIS distribution and

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will maintain a master list of those to whom the DEIS is sent. The length of the DEIS public comment period, normally no less than 45 days from publication of the notice of availability in the *Federal Register*, will be determined by the scoping committee. Materials to be made available to the public shall be provided to the public without charge to the extent practicable, or at a fee which is not more than the actual costs of reproducing copies required to be sent to other Federal agencies, including CEQ.

At any time in the DEIS process, the initiating office, in consultation with the Environmental Quality Staff, the Citizen Action Office, and other interested offices, may provide for additional public involvement to supplement EIS preparation. The type of and format for public involvement will be selected as appropriate to best facilitate timely and meaningful public input into the EIS process.

5.4.6 FEIS Preparation

At the close of the DEIS public review period, the Environmental Quality Staff will, in consultation with the initiating office and other interested offices, determine what is needed for the preparation of an FEIS. If the requisite changes in the DEIS are limited to making minor factual corrections and explaining why the comments received do not warrant further response, an errata sheet containing only DEIS comments, responses, and factual corrections in the DEIS may be prepared by the initiating office. If other more extensive modifications are required, the initiating office will, in consultation with the Environmental Quality Staff and other interested offices, prepare a preliminary FEIS utilizing an appropriate format (see 40 CFR 1502.10).

The errata sheet or preliminary FEIS will be prepared and circulated by the initiating office to the Environmental Quality Staff, Office of the General Counsel, and other interested offices for review and comment. All reviewing offices will supply written comments concerning the errata sheet or preliminary FEIS to the initiating office with copies to the Environmental Quality Staff and Office of the General Counsel.

The initiating office, with the assistance of the Environmental Quality Staff, will review all comments received and modify, as appropriate, the errata sheet or the preliminary FEIS. After the errata sheet or preliminary FEIS is revised, the initiating office will transmit it to other interested offices for their final approval. The Environmental Quality Staff will, in consultation with the Office of the General Counsel, review the document and transmit it to the General Manager for approval along with a list of environmental commitments made in the EIS.

Measures (if any) to minimize or mitigate impacts committed to in the FEIS will be identified and implemented as described in section 5.5 (Mitigation Commitment Identification, Auditing, and Reporting).

5.4.7 FEIS Transmittal

Upon notification of approval from the General Manager, TVA will transmit the FEIS and appropriate notices to EPA and other Federal, State, and local agencies (including State and regional A-95 clearinghouses or other State/local coordination points) to whom copies of the DEIS were sent. The FEIS will also be sent to every person and organization to whom copies of the DEIS were sent or from whom comments were received.

5.4.8 Commencement of Action

Except in emergency circumstances, an action for which an EIS has been approved will not commence until 30 days after notice of availability of the final statement has been published in

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the *Federal Register* or 90 days after a notice of availability of the DEIS has been published in the *Federal Register*, whichever is later.

5.4.9 Record of Decision

After release of the FEIS, a Record of Decision shall be prepared for the General Manager by the Environmental Quality Staff, in consultation with the Office of the General Counsel and the initiating office. The record will normally include the following: (1) what the decision was; (2) what alternatives were considered; (3) which alternative(s) was considered to be environmentally preferable; (4) the alternatives' associated environmental considerations (which may include a discussion of measures to be taken to mitigate or minimize adverse environmental impacts (see 40 CFR 1505.2); and (5) what monitoring, reporting, and administrative arrangements have been made (see 40 CFR 1505.2). Records of decision will be made available to the public.

5.4.10 Revisions and Supplements

If significant new information concerning action modifications, alternatives, or probable environmental effects becomes available, TVA will make such information available to the public. The initiating office shall consider preparing a revision or a supplement to the EIS. The Environmental Quality Staff will, in consultation with the initiating office, Office of the General Counsel, Citizen Action Office, and other interested offices, determine the method of making such information available to the public.

5.4.11 EIS Adoption

TVA may adopt as its final EIS another EIS or any portion thereof whether or not TVA participated in its preparation. The Environmental Quality Staff and the Office of the General Counsel, in consultation with the initiating office, will determine if the EIS proposed for adoption adequately assesses the TVA action and is still generally available to the public.

If it is determined that the EIS proposed for adoption or the relevant portion thereof is adequate and still available, TVA will circulate its written finding of this determination and advise that copies of the EIS will be sent to any person or agency requesting it. If the EIS is not available, TVA will then circulate, along with its written finding, the adopted EIS (or relevant portion) or a summary thereof (see 40 CFR 1502.12; 40 CFR 1502.19 (d)).

If the EIS is generally available and TVA determines that significant supplementary information is needed, TVA will prepare and circulate a supplement to the EIS and advise that copies of the adopted EIS will be sent to any person or agency requesting it. If the EIS is not generally available, TVA will circulate its supplement along with either the adopted EIS or a summary thereof (see 40 CFR 1502.12; 40 CFR 1502.19 (d)). The above findings or documents shall be approved and circulated in accordance with section 5.4.5 or 5.4.7, as appropriate.

5.5 Mitigation Commitment Identification, Auditing and Reporting

All significant measures planned to minimize or mitigate expected environmental impacts shall be identified in the EA or EIS (or, as appropriate, in a memorandum documenting the Environmental Quality Staff's determination or concurrence that a proposed action is a categorical exclusion) and compiled in a commitment list. The commitment list will include, to the extent practicable, the estimated cost of each commitment. The commitment list is prepared for both the draft and final EA or EIS and should be developed in cooperation with the Environmental Quality Staff and all interested offices.

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Each such commitment in the commitment list will be tentatively assigned by the initiating office to the appropriate responsible office and such assignments shall be transmitted to the Environmental Quality Staff and affected offices at the time the draft EA or EIS is sent out for review. The initiating office should consult with the assigned offices to resolve assignment conflicts, identify supporting offices, and determine commitment schedules. Prior to finalization of the commitment list, the initiating office shall obtain Environmental Quality Staff concurrence that commitments can be monitored for compliance. At the time of finalizing the EA or EIS, the initiating office shall submit to the Environmental Quality Staff a finalized commitment list.

The initiating office shall report, periodically and upon request to the Environmental Quality Staff, the status of a commitment. The Environmental Quality Staff will ensure that commitments are met and will, as it deems appropriate, audit commitment progress. Circumstances may arise which warrant modifying or deleting previously made commitments. When such circumstances occur, the office desiring the change shall submit to the Environmental Quality Staff and the initiating office a request which shall include the basis for changing or deleting the commitment and an evaluation of the environmental significance of the requested change. The decision to modify or delete the commitment will be made by the Environmental Quality Staff in consultation with the Office of the General Counsel and the initiating office.

5.6 Emergency Action

Because of unforeseen situations or emergencies, or through inadvertence, or for other reasons, some of the steps outlined in these procedures may be consolidated, modified, or omitted. The Environmental Quality Staff and the Office of the General Counsel shall be promptly notified and asked to approve any such consolidation, modification, or omission, and may do so if such change would conform to legal requirements and substantially comply with the intent of these procedures. The Environmental Quality Staff, in consultation with the Office of the General Counsel, will consult with CEQ when appropriate before such changes are approved.

5.7 Floodplains and Wetlands

5.7.1 Purpose and Scope

Consistent with Executive Order Nos. 11988 (Floodplain Management) and 11990 (Protection of Wetlands), and TVA Code under IX FLOODPLAIN MANAGEMENT AND PROTECTION OF WETLANDS, the review of a proposed action undertaken in accordance with sections 5.2, 5.3, or 5.4 of these procedures that potentially may affect floodplains or wetlands shall include a floodplain or wetlands evaluation as required by this section. A wetland evaluation is not required for (1) the issuance of permits, licenses, or allocations to private parties for activities involving wetlands on non-Federal lands; (2) projects or programs under construction or in operation as of May 24, 1977; (3) projects for which all funds were appropriated through June 1977; or (4) projects for which a draft or final EIS was filed before October 1, 1977. Moreover, no reevaluation of floodplain or wetland impacts is required for projects, programs, and policies approved by TVA before July 23, 1979.

5.7.2 Evaluation Process

5.7.2.1 Area of Impact

If a proposed action will potentially occur in or affect wetlands or floodplains, the initiating office, as soon as practicable in the planning process, will request the Office of Natural Resources to determine whether the proposed action will occur in or affect a wetland or floodplain and the level of impact, if any, on the wetland or floodplain. If

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the Office of Natural Resources determines that the proposed action (1) is outside the floodplain or wetland, (2) has no identifiable impacts on a floodplain or wetland, and (3) does not directly or indirectly support floodplain development or wetland alteration, further floodplain or wetland evaluation shall be unnecessary.

5.7.2.2 Actions That Will Affect Floodplains or Wetlands

When a proposed action can otherwise be categorically excluded under section 5.2, no additional floodplain or wetland evaluation is required if (1) the initiating office determines that there is no practicable alternative that will avoid affecting floodplains or wetlands and that all practical measures to minimize impacts to floodplains or wetlands are incorporated and (2) the Office of Natural Resources determines that impacts on the floodplain or wetland would be minor.

If the action requires an EA or an EIS, the ensuing evaluation shall consider (1) the effect of the proposed action on natural and beneficial floodplain and wetland values and (2) alternatives that would eliminate or minimize such effects. The initiating office shall determine if there is no practicable alternative to siting in a floodplain or constructing in a wetland. If the Environmental Quality Staff in consultation with the Office of the General Counsel concurs, this determination shall be final. If a determination of no practicable alternative is made, all practical measures to minimize impacts on the floodplain or wetland shall be implemented.

If at any time prior to commencement of the action it is determined that there is a practicable alternative that will avoid affecting floodplains or wetlands, the proposed action shall not proceed.

5.7.2.3 Public Notice

Public notice of actions affecting floodplains or wetlands is not required if the action is categorically excluded under section 5.2. If an EA or EIS is prepared and a determination of no practicable alternative is made in accordance with section 5.7.2.2, the initiating office shall notify the public of a proposed action's potential impact on the floodplain or wetland.

Public notice of actions affecting floodplains or wetlands may be combined with any notice published by TVA or another Federal agency if such a notice generally meets the minimum requirements set forth in this section. Issuance of a draft or final EA or EIS for public review and comment will satisfy this notice requirement.

Public notices shall at a minimum (1) briefly describe the proposed action and the potential impact on the floodplain or wetland; (2) briefly identify alternative actions considered and explain why a determination of no practicable alternative has been proposed; (3) briefly discuss measures that would be taken to minimize or mitigate floodplain or wetland impacts; (4) state when appropriate whether the action conforms to applicable State or local floodplain protection standards; (5) specify a reasonable period of time within which the public can comment on the proposal; and (6) identify the TVA official who can provide additional information on the proposed action and to whom comments should be sent.

Such notices shall be issued in a manner designed to bring the proposed action to the attention of those members of the public likely to be interested in or affected by the action's potential impact on the floodplain or wetland. The initiating office, in

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consultation with the Environmental Quality Staff and the Citizen Action Office, shall determine the manner in which the notice will be made available to the public. Typical ways of providing public notice include direct mailing, posting in appropriate places in the vicinity of the proposed action, publication in the *Federal Register*, or publication in newspapers of general circulation in the area of the proposed action. If a floodplain public notice is required, a copy of such notice shall be included in information sent to State and regional clearinghouses for those actions subject to Office of Management and Budget Circular A-95 or other State/local coordination points.

TVA shall consider all relevant comments received in response to a notice and shall reevaluate the action as appropriate to take such comments into consideration. The Environmental Quality Staff, in consultation with the initiating office, shall determine if response is necessary and the initiating office, in coordination with other interested offices, shall prepare comment responses. The Environmental Quality Staff, in consultation with the Office of the General Counsel, shall approve all comment responses before release.

A proposed action may not be implemented before publication of any required public notice and appropriate consideration of any relevant comments received in a timely manner.

5.7.2.4 Disposition of Real Property

When TVA property in a floodplain or wetland is proposed for lease, easement, license, right of way, or disposal to non-Federal public or private parties and the action will not result in disturbance of the floodplain or wetland, floodplain or wetland evaluation is not required. The conveyance document, however, shall specify:

1. Applicable restricted uses under Federal, State or local floodplain and wetland regulations.
2. Other appropriate restrictions to minimize destruction, loss, or degradation of floodplains and wetlands and to preserve and enhance their natural and beneficial values, except when prohibited by law or unenforceable by TVA or, otherwise, the property shall be withheld from conveyance or use.

If the disposition of TVA property rights in a floodplain or wetland potentially will result in disturbance to the floodplain or wetland, the proposed action shall be reviewed in accordance with sections 5.7.2.1 - 5.7.2.3.

5.8 Miscellaneous Procedures

5.8.1 Proposals for Legislation

Proposals for congressional legislation significantly affecting the quality of the human environment will require the preparation of an EIS (see 40 CFR 1506.8).

5.8.2 Private Applicants

In those cases when private applicants or other non-Federal entities propose to undertake an action that will require TVA's approval or involvement and fall within the scope of these procedures, the contacted office will as soon as possible notify the Environmental Quality Staff.

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Each office will maintain information to advise potential applicants of studies or other data that may be required in connection with applications and will take reasonable steps to publicize accessibility of such information. The office charged with initiating action, upon the applicant's request, will in consultation with the Environmental Quality Staff when practicable advise the applicant of the information or studies (including the preparation of environmental documents, if necessary) that will be required in order to fulfill its responsibilities hereunder. The applicant must provide TVA sufficient information to allow an accurate determination of the environmental impacts of the proposed action. TVA may require that this information be submitted in the form of a written environmental report. If TVA is required to make investigations or otherwise incur additional expenses, the applicant may be charged for TVA's service. The Environmental Quality Staff, in consultation with the Office of the General Counsel, will also determine the need to consult early with appropriate Federal, State, and local agencies (including State and regional A-95 clearinghouses or their State/local coordination points); Indian tribes; and other interested persons regarding TVA's involvement in or approval of the applicant's proposed action and, where appropriate, should commence such consultation at the earliest practicable time.

5.8.3 Non-TVA EISs

The Environmental Quality Staff, in consultation with other interested offices, will coordinate the review of EISs provided to TVA for review by other Federal agencies. The Environmental Quality Staff, in consultation with the Office of the General Counsel, will prepare comments on such EISs and transmit any TVA comments to the initiating agency (see 40 CFR 1503.2 - 1503.3).

5.8.4 Supplemental Instruction

The Environmental Quality Staff, in consultation with interested offices and with concurrence of the Office of the General Counsel, may issue supplemental or explanatory instructions to these procedures.

5.8.5 Modifications of These Procedures

The assignments to offices in these procedures can be modified by agreement of the offices involved or by instructions from the General Manager.

5.8.6 Tiering

An initiating office may consider tiering the environmental review of a proposed action. Tiering involves coverage of general matters in broader environmental documents, and subsequent narrower analyses need only incorporate by reference the broader analyses (see 40 CFR 1508.28).

5.8.7 Combining Documents

Any environmental document may be combined with any other document to reduce duplication and paperwork.

5.8.8 Applicability to Ongoing Actions

These procedures shall not apply to those actions which have been approved under applicable procedures prior to the effective date of these procedures or for which an EA or a DEIS has already been prepared. No environmental documents need be redone by reason of the adoption of these revised procedures.

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5.8.9 Consolidation of Reviews

Review of proposed actions under these procedures may be consolidated with other reviews where such consolidation would reduce duplication or increase efficiency.

5.8.10 Documents

The Environmental Quality Staff shall keep on file all final and approved environmental documents.

5.8.11 Substantial Compliance

Minor deviations from these procedures will be permitted, but in all respects substantial compliance must be achieved. Flexibility is the key to implementing these procedures and reviewing proposed actions.

5.8.12 Reducing Paperwork and Delay

These procedures are to be interpreted and applied with the aim of reducing paperwork and the delay associated with both assessment and implementation of a proposed action. In this regard, data and analyses shall be commensurate with the importance of associated impacts. Less important material should be summarized, consolidated, or referenced.

5.8.13 Office Responsible for NEPA Compliance Efforts

The Director of Environmental Quality is designated as that person responsible for overall NEPA compliance.

5.8.14 Status Reports

Information or status reports on EISs and other related NEPA compliance activities and documents may be obtained by writing to the Director of Environmental Quality, Tennessee Valley Authority, Knoxville, Tennessee 37902.

5.8.15 Public Participation

TVA's policy is to encourage public participation in all of its decision making. This policy is implemented through various mechanisms. TVA has open meetings of the Board of Directors. These Board meetings are widely publicized and include a question and answer session between the public and Board of Directors. TVA has established a Citizen Action Office whose responsibility is to maximize to the extent practicable the interchange of ideas between TVA and the public in the full range of TVA activities. In addition, TVA has set up a "Citizen Action Line" which allows members of the public to call in on toll-free lines to ask questions and make suggestions or comments to TVA. In line with TVA's broad policies, TVA intends to encourage and actively seek public participation in its NEPA review process. The type of and format for public participation will be selected as appropriate to best facilitate timely and meaningful public input into the review process.

Cathy Dyer

Cookeville, Tennessee

Comment:

“I believe that TVA can use existing infrastructure to avoid damaging many homes and businesses for a new transmission line. This proposed project would damage the environment by destroying habitat for native animals. Also, it destroys many homes and farms, needlessly. Please abandon this project.”

Peggy Evans

Cookeville, Tennessee

Comment:

“For the life of me I can not figure out why TV would not use an existing right-of-way to run a new line. The folks living on Buck Mountain paid extra money to have buried utilities. This was to preserve the look of living in the woods.

Now, of all the proposed routes, the only one you choose is the one which destroys what nature is left and negates the purpose of burying utilities. Why?

I do not live in that area and I do have utility lines showing in my neighborhood. But, if I and my neighbors had paid extra to bury utilities, I would be as offended as the Buck Mountain residents.

It would be prudent for you to reconsider the chosen route. Please consider a less damaging route. The beautiful Cookeville we moved to 3 years ago is rapidly disappearing under an assault of power lines, billboards and blacktop. Enough is enough.”

J. C. Finch

Cookeville, Tennessee

Comment:

“I'd like to make three points about this project: 1)The need for this project has not been demonstrated. UC EMC has declared there is a need but has shown no proof for such. The taxpaying public has a right to review records that show there is a reason to build this transmission line. 2)The proposed route is the most environmentally damaging of possible routes and also destroys a number of homes. More consideration should be given to alternate routes, including SR-111. 3)IF it is determined that this project is justified AND the proposed route is the only feasible one, I request that an Environmental Impact Statement be completed for this route. U.S. citizens still require that our government follow democratic principles outlined in our constitution. Those principles apply to all government agencies, including the Tennessee Valley Authority.”

Dr. Richard C. Finch

Cookeville, Tennessee

Comment:

“I oppose the proposed new Algood transmission line and substation as presently planned. 1) My understanding is that TVA proposes to build a

new transmission line because UCEMC claims it needs extra capacity. But last I heard, UCEMC refused to make public any records that would document this need. I do not believe that a destructive engineering project should be initiated on the say so of a corporation unwilling to make public the data that document the claimed needs. 2) If the need for additional capacity can be documented, the conservation approach to lower projected needs should be pushed far harder than it thus far has. 3) If there is a real need for a new transmission line, then the route that does the least damage to the homeowners in the Algood area and to the area's overall environment should be the route selected. I believe that the route following SR-111 ROW has not been properly considered. I realize that to do this would require an unusual degree of cooperation between TVA and TDOT, but both agencies are supposed to serve the public good and it would not hurt either to put out the extra effort to come up with a cooperative solution to any ROW issues TDOT might have. Certainly using this route would be the least harmful to the environment and to the homeowners. Thank you.

Richard C. Finch
Professor of Geology, retired”

Dean Freitag

Comment:

“I did not take the time to scan 127 pages on the internet. i would lke to be assured that the old transmission line will be removed and the area restored when the new line is in place. Thank you,

Dean Freitag”

Louise Gorenflo
Crossville, Tennessee
Comment:

James F. Williamson, Jr.
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Comments: TVA Transmission Line Across Buck Mountain to the Algood Substation
January 14, 2008

- The need for this project has not yet been openly determined. Information regarding the need for this project has not been made available to the public.
- The new industries and developments in the Algood area that form the basis of the need have not materialized and are not currently being planned.
- If the real need is the West Cookeville substation, then TVA should explore all alternatives to meet the power demands for this substation.
- A 1.5 percent conservation effort could meet the TVA projected demand increase at the West Cookeville substation. This is attainable, and TVA could make this project an energy efficiency project.
- A full NEPA study is needed. This transmission line will cut down 32 acres of trees, fragmenting a contiguous forest. It could potentially impact endangered species such as grey bats, Indiana bats, Least Trillium and threatened species such as the Cerulean Warbler who were not studied at the appropriate time of the year.
- This route contains karst features such as caves and sinkholes. Herbicides applied to this type of terrain could have a devastating impact on both ground and surface water for such places as Falling Water River and Booger Swamp Protected Area. It will imperil those individuals who still get their water from wells and streams. City water is not available for part of this route.

Louise Gorenflo
185 Hood Drive
Crossville TN 38555
931/484-2633

Jewell M. Hall
Cookeville, Tennessee
Comment:

Jewell M. Hall
420 Old Qualls Rd.
Cookeville, TN 38506

1-7-08

Mr. Williamson,

I thank you for the making the choice on the T.V.A. line. We all need the power, but if homes are taken instead of trees.

It takes lots of trees to build a house. I have lived in my house for 60 yrs. Built by our own hands. So its so loved by all the family.

We thank you again,

Jewell Hall

Marilee Hall
Cookeville, Tennessee
Comment:

"I would be interested in seeing proof that the line is necessary. It is a large project and a major invasion of property and habitat, and I'd like to be assured that it is necessary. I would also like to understand whether or not an alternative route has been considered. I am told that an alternative route along Hwy 111 Right of Way was suggested. It is already developed, and the property could be shared with TDOT- it seems like a workable solution, one that would not require so much destruction. It would be so exciting for the TVA to embark on such a program in concert with another agency, rather than feeling the necessity to endanger wildlife and take land- land which is not renewable."

Ada Haynes
Cookeville, Tennessee
Comment:

**Ada Haynes Comments on TVA Draft EA for Algood Transmission Line
Sent Monday, January 14, 2008**

Introduction

Property owners along this route have been treated worse than criminals during the process of siting this transmission line. If we had been accused of a crime, we would have been entitled to the evidence against us. In this situation, our property is being taken by eminent domain and our lives are being put at risk, but we have repeatedly been denied access to the information that this transmission line is needed. We have been denied the information from TVA through the Freedom of Information Act and we have been denied the information as members of UCCEMC. The limited data that we have been given is based on outdated speculation. The projections are based on three new industries relocating to Algood and a new 400-unit apartment complex. The 400-unit apartment complex that has been discussed is no longer being built in Algood and the Putnam County Chamber of Commerce is not aware of these three new projected industries. Even the TVA spokesperson says that transmission line projects such as this are often based upon speculation. The plan does not consider the impact of the loss of over 1200 UCCEMC customers that are being annexed by the City of Cookeville. Many of these customers are serviced by the Algood substation.

Another reason presented as the need for the new transmission line is to take the load off of the Cookeville West substation. However, there is a major problem in that all other alternatives have not been considered for relieving this load nor have we been provided information that justifies that there will be an increased load for this substation. I feel that since the need for this transmission line has not adequately been made TVA should go with the no build option. Building of a transmission line east of Algood to service West Cookeville is geographically challenged. Cookeville Electric has requested upgrades that would take the load off of the West Cookeville substation without building any transmission lines. This seems a much more effective and efficient plan and wiser use of tax payer monies.

If TVA decides to build this route based upon inadequate and speculative information, then a full National Environmental Impact Analysis needs to be conducted to analyze the environmental damage caused by the new transmission line. The damage caused by the loss of forest (contiguous forest in particular), potentially endangered species, wetlands, water quality and cultural impact have not been fully reported. Many of the species such as endangered bats, the Cerulean Warbler, and trillium were not studied during the appropriate time of the year. The two caves closest to the line most likely to have endangered bats were not studied. The cultural study provides no mention extensive historic and prehistoric Native American habitation along and around the route nor does it mention the last horse and buggy mail route for the state of Tennessee which we are currently working toward getting listed on the Historical Register.

Need

After months of requests for information about the need for this project we were finally given a brief description of the need for the information. Our research demonstrated that the information presented to us to justify the need for the project is based upon an outdated, speculative, and incorrect report. The information from TVA's

website on August 1, 2007 and in TVA's draft EA stated that this project was needed based upon the following assumptions that would lead to an increase in demand at the Algood substation by 8 megawatts in peak power.

1. Three large industries were relocating to the Algood area.
2. A large 400 unit apartment complex would be built in Algood.
3. Hundreds of new homes would be constructed in the Algood area.

According to the Algood City Planner and the Putnam County Chamber of Commerce, they have no knowledge of any new large industries moving into the Algood area. The developers of the 400 unit apartment complex have decided not to build the complex. The bubble has burst on the building boom and new home construction around the country is on the decline.

The justification for need of the project was not only revealing by the above-mentioned incorrect items being included but also revealing in what was missing.

1. The need did not take into account the loss of over 1200 customers UCEMC lost to Cookeville Electric. Many of these residents are serviced by the Algood substation.
2. The need did not take into account the additional customers that UCEMC is scheduled to lose to Cookeville Electric as part of Cookeville's Urban Expansion Plan.
3. The need did not consider other ways to remove the load from the Cookeville West substation or the Algood substation.
 - a. There was no consideration of redistributing customers to other substations. As customers are lost to UCEMC to Cookeville Electric these customers will be re-routed to other substations.
 - b. No consideration was given to the use of distributed power generation in the area other than saying that it would take too long to implement. Tennessee Technological University has generators that could be used for peak demand that would produce 8 megawatts of power (the amount of growth that TVA is projecting for the Algood substation). Tennessee Technological University is willing to sell these generators to TVA to reduce this load. These generators would also serve as back up power in case a line went down.
 - c. Conservation measures were essentially dismissed even though TVA claims that conservation is an important component of its strategic plan. TVA currently estimates that conservation can lead to a decrease in energy consumption of 10-15 percent. Energy conservation information was only provided for the Algood area and is estimated to be much lower than this 10-15 percent projected for TVA overall. Energy conservation information needs to be provided for the entire area. If you take out the erroneous growth in Algood only 1.5 percent conservation effort needs to take place to prevent the West Cookeville sub-station overload. This is easily obtainable and would provide time for all information to be considered and effective planning based upon correct, current information to be made.

- d. Sustainable energy was not considered even though TVA claims that sustainable energy is an important component of its strategic plan.
- e. The new substation that Cookeville Electric was ordered to build for UCEMC was not taken into consideration.

Given that all information regarding need was not given to the public and that incorrect information was provided to the public and that other relevant information was not even considered in the calculation, the information regarding need that was provided seems arbitrary and capricious. In the worst-case scenario it seems that TVA controlled the information in a way that could easily be perceived as fraudulent and in the best-case scenario seems like reckless and poor management. Effective management requires proper planning based upon quality up to date information.

Based upon the information that we are able to obtain, the Algood substation is actually going to lose customers. If you take off the projected growth for Algood the TVA West Cookeville-East Cookeville-Algood Transmission line is no longer exceeding capacity. This only leaves the issue of the TVA West Cookeville substation. Again, one must wonder if the projected growth demands on the West Cookeville substation might also be based upon outdated erroneous information. Even if there is real evidence of growth at the West Cookeville substation, the Algood transmission line is not needed. Likewise only a 1.5 percent conservation effort would be required based upon TVAs on projections to thwart an overload. Since the TVA West Cookeville substation is the only possible issue left, a new study needs to be conducted that would consider the best way to supply power to the TVA West substation—if even more power is needed. Since it is highly likely that UCEMC and Cookeville Electric will be severing ties in the near future investing in a new transmission line for a UCEMC substation that is losing customers does not seem the most effective way of dealing with this situation. Also, TVA's report does not take into account the new substation that Cookeville Electric has to build for UCEMC. Why was this not taken into account? Again this seems like an arbitrary decision to ignore this information.

A solution would be for TVA to reinstate the incentives for interruptible power to TTU. This would allow for the peak demand to be removed from the TVA West Cookeville substation since TTU indirectly gets their power from the TVA West Cookeville substation through Cookeville Electric's West Cookeville substation. This would allow time for more effective planning.

TVA needs to go back to the drawing board and develop a long range plan that would take into consideration that their initial reports are erroneous and outdated and develop a new comprehensive plan that takes into consideration the annexations of a large number of customers by Cookeville Electric before destroying the lives of property owners, the environment and cultural resources. Since your entire draft EA centers around meeting the growth demands for Algood based upon outdated erroneous information, this entire draft is faulty. We should be provided new details that are suppose to lead to this increased burden on the Cookeville West substation. We have repeatedly requested this information under the Freedom of Information Act. We feel that before eminent domain is used, the property owners should be entitled to the details of this increased need and that all possible alternatives are considered. Even if there is an increased need to the Cookeville West substation, then all possible ways to alleviate that

demand including upgrading equipment for Cookeville Electric, conservation and distributive power need to be considered.

Environmental Impact

TVA's draft environmental assessment report is arbitrary and cupreous both in terms of the matrix used to select the route and coverage of issues. The matrix used to select routes is ridiculous. How can a route that would destroy 32 acres of trees have the lowest level of environmental impact? Just because a county has a large number of trees can the loss of those trees be a low consideration? Just because I have ten fingers doesn't mean that the loss of a finger would be a small impact on my life. Little consideration was given to the loss of contiguous forest. Loss of contiguous forest can permanently destroy habitats and possibly in this case the habitat of endangered and threatened species such as gray bats, Indiana bats, and the Cerulean Warbler. Information regarding Native American habitation and artifacts and the last horse and buggy mail route for the state of Tennessee were ignored. The importance of the environment of the Cumberland Plateau is well documented. "Along with education and job creation, environmental preservation is a fundamental issue for the future prosperity of our state, and the Cumberland Plateau is a critical area to target," said Governor Phil Bredesen.

Matrix Used to Determine Routes

The matrix used to determine routes is arbitrary and cupreous. Where are the written guidelines used to determine what is considered important in the matrix? Without written guidelines for completing the matrix, the siting engineer or others making the decision about which route is used can manipulate the matrix to pick any route they choose. For example, how can a route across a Karsts region, will cut down 32 acres of trees, and destroy contiguous forest, have minimal environmental impact? Having consistent and non-arbitrary guidelines for completing the matrix is particularly important in that all other routes than the one selected as the preferred route goes through the family farm of a UCEMC Board member. This is a major conflict of interest. Again, an arbitrary and cupreous matrix can make a political decision appear on the surface to be an objective decision but it does not make it an objective decision.

Inadequacies of the Environmental Assessment

TVA's draft environmental assessment report is arbitrary and cupreous also in its coverage of issues. The study did not take place during a period when you would expect to find the threatened or endangered species along the route. Caves which were most likely to have endangered bats were neglected while no complete cave inventories were conducted despite the fact that researchers have found the caves on the Cumberland Plateau to be rich in biodiversity. No cave surveys were done by TVA. However, we had already provided TVA with the information that cavers who had conducted a cave survey in one of the caves closest to the route had found rare and previously unidentified species in one cave along the route. Dye tests were not conducted to find the impact of herbicides being sprayed on a Karsts region on the aquifer and on the Booger Swamp Protected Area-even though previous dye studies have found that at least one cave drains into Booger Swamp Protected Area. Some cultural issues were totally neglected.

Others were minimized. Full reports of the TVA contracted biologists and archaeologists were not made available to the public.

Cerulean Warblers

Cerulean Warblers are a threatened species that could be impacted by this transmission line. According to TVA's draft environmental assessment,

Although cerulean warblers were not observed during field inspection of the proposed transmission line or the existing transmission line to be sold, numerous records exist for Putnam County. Cerulean warblers occur largely in unfragmented, mature deciduous forests, particularly along floodplains or other mesic areas. The mature forests found along the proposed new transmission line route provide habitat for this species, specifically, the one mile of dry ridgetops and moist coves east of the proposed substation site (TVA, Draft EA).

TVA's draft environmental assessment is totally inadequate because the study did not cover May, the time of the year when Cerulean Warblers would be observed in this area. A full NEPA needs to be conducted to study the impact on Cerulean Warblers. If Cerulean Warblers are in the area, cutting the contiguous forest would cause irreparable harm to this threatened species.

Endangered Bats

The survey of endangered and threatened bats is also completely inadequate. All the potential caves for endangered bats were not surveyed and the surveys that did take place did not take place at the time of the year in which endangered bats were most likely to be observed.

Caves near the proposed new transmission line route offer potential Indiana bat hibernation habitat. However, Indiana bats have not been recorded from these caves. Three nearby caves were examined for evidence of Indiana bats. Walled-up Cave was mist-netted on August 6 and 7, 2007 (Ramley 2007) and Trench Cave was mist-netted August 13, 2007 (Fiedler 2007). Indiana bats were not expected at this time of year, and no Indiana bats were caught at either survey (TVA Draft EA).

Only two of the tree caves were mist-netted and both were netted at a time of the year when Indiana bats were not expected.

Rafinesque's big-eared bats occupy Trench Cave, which is located approximately 210 feet from the proposed transmission line route. The nearest known gray bat cave and Indiana bat cave both occur 3.2 miles from the proposed transmission line route. Because of this distance, the proposed actions would not affect this cave. Other caves in the area also provide suitable habitat for all three species of bats; however, only three caves are located close enough to the proposed route to potentially experience impacts. . .Two caves provide potential migratory or winter

habitat for gray bats, and all provide suitable habitat for Rafinesque's big-eared bats (TVA Draft EA).

TVA never mist-netted or entered Red Rag cave which is the cave most likely to have both gray and Indiana bats. A full NEPA needs to be conducted to study the impact on endangered and threatened bats. TVA did not study whether the caves are all interconnected. If the caves are interconnected, then protecting only the caves nearest the power line would not fully protect the endangered bats. Due to the large number of caves and sink holes in the area (both documented and undocumented), interconnectedness of the caves is a major possibility.

Heron

Even though residents have spotted heron near the right-of-way, myself included, no studies were done to study whether heron existed along the line or to protect heron along the line. In addition, to heron that have been spotted in a pond near the route, two wetlands were identified within the proposed right-of-way. One of the caves owned by Bob Johnston drains into Booger Swamp Protected area. No provisions seem to be made to protect heron or even to study the existence of heron in the area. A full NEPA needs to be conducted to study the existence and impact on heron.

Least Trillium and Other Endangered and Threatened Plants

Several neighbors including Bob Johnston and Paul Isbell have reported trillium on their property. A full NEPA study needs to be conducted to study whether the trillium reported is Least Trillium, an endangered species. According the biologist contracted with TVA in a personal conversation with me, he said that he intended to request that TVA continue their study through the spring to study the impact to endangered plants. Again, the study was conducted during a time when trillium and other endangered plants could not be identified. We were not provided with the full biologists' report. We are curious whether this and similar statements were made and were not included in the draft EA.

Endangered Fish and Mussels

TVA acknowledges that endangered fish and mussels are in the watershed fed by the area covered by this transmission line. A full NEPA needs to be conducted about the impact of this transmission line on these endangered species. Any herbicide application at all in this Karsts region could impact these endangered fish and mussels.

Groundwater, Surface Water and Geology

The proposed transmission line travels through a large area of Karsts features such as caves and sinkholes. The proposed transmission line also could potentially impact both ground and surface water in the area

The proposed transmission line taps into the existing West Cookeville-

Peavine 161-kV transmission line approximately 900 feet south of the river. The

Algood Power Supply Upgrade 40 Draft Environmental Assessment existing transmission line crosses the Falling Water River approximately 600 feet

west of the tap point. As shown in Figure 4, the proposed new transmission line would parallel a tributary of Falling Water River for approximately 2,300 feet in Rockwell Hollow.

•• **Spring Creek**, in Jackson, Overton, and Putnam counties from river mile 0 at the confluence with Roaring River to river mile 25 and its headwaters two miles

northeast of Brotherton, is listed on the NRI and is approximately 3.0 miles from the proposed transmission line. The National Park Service recognizes this 25-mile stream for its scenic, recreational, geologic, and fish and wildlife values.

•• **Booger Swamp Registered State Natural Area** is approximately 1.1 miles west of the proposed new transmission line. Tennessee's Natural Areas Registry Program develops non-binding voluntary agreements with private and public landowners to protect such sites. (TVA Draft EA)

The proposed Algood Transmission 161-kV line crosses the Eastern Highland Rim and the Plateau Escarpment ecoregions within drainages of the Roaring River, a direct tributary to the Cumberland River, and Falling Water River, a tributary to the Caney Fork River. Several streams crossed by the subject transmission lines are located in a transitional area between the two ecoregions but retain typical characteristics of Highland Rim streams. No

streams in the Roaring River occur within the proposed right-of-way, and therefore this watershed is not discussed further in this section.

Etnier and Starnes (1993) report that streams of the Highland Rim region are characterized by coarse chert gravel and sand substrates interspersed with bedrock areas, moderate gradients, clear waters, and moderate to low productivity, and thus little aquatic vegetation except near spring sources. Additionally, the Highland Rim is host to the most diverse fish fauna of any region of comparable size in North America (Etnier and Starnes 1993). According to Natureserve (2006), the Caney Fork watershed supports 88 species of fish. Aquatic insects, mussels, snails, and other aquatic organisms are similarly diverse in this

watershed. Representative fish and mussels occupying streams in the watershed are described in Etnier and Starnes (1993) and Parmalee and Bogan (1998). Some of the fish and mussels in the watershed are federally and/or state-listed as endangered, threatened, or of other conservation concern. Further discussion of these species is provided in Section 3.3.3.

3.2.1. New Transmission Line Right-of-way

Twenty watercourses including three perennial, nine intermittent, six wet-weather

conveyances, and two ponds occur along the proposed transmission line route. The location of each of these was recorded using a global positioning system (GPS), and a habitat assessment form was completed for each during a September 2007 field survey. A listing of stream crossings, excluding wet-weather conveyances is provided as Table F-1 in Appendix F. Five watercourses were spring heads located in or near the right-of-way. Watercourses documented during the field survey were typical of the Highland Rim region as described above. One perennial stream that would be crossed by the proposed transmission line, the Falling Water River, is considered a high quality stream by the Tennessee Department of Environment and Conservation (TDEC) and is listed on the TDEC 303d list as impaired due to loss of biological integrity because of siltation (TDEC 2006). The Falling Water River is listed on the Nationwide Rivers Inventory (see TVA Draft EA, Section 3.8).

A full NEPA needs to be conducted to measure the impact of this transmission line on these water sources and the endangered and threatened species in this watershed. Bob Johnston provided information to TVA that his cave drains into Booger Swamp a Protected Area. A leading cave expert in the area, Kristen Bobo, found that Bob Johnston's cave is larger than previously believed and she believes could impact the aquifer for the area.

This area supplies ground water to the Falling Water river basin and the residences in the Poplar Grove Community and Rockwell Holler below Buck Mountain. Many of these residences do not have access to city water and rely on spring or wells for drinking water. Contamination of their drinking water supply is almost certain during construction of the transmission line and during herbicide application to maintain the ROW. While EPA may have approved of the herbicides used for certain situations, they did not provide approval for people to drink the herbicides.

Karst systems are readily susceptible to contamination as the waters can travel long distances through conduits with no chance for natural filtering processes of soil or bacterial action to diminish the contamination. "Mature" or well-developed karst is particularly susceptible to contamination, and some karst in the project area is considered mature. In unconfined or poorly confined conditions, karst aquifers have very high flow and contaminant transport rates under rapid recharge conditions such as storm events (TDEC 2002a). The hydraulic characteristics of the aquifers occurring in Mississippian age strata, which are present in much of the project area, can vary greatly over short distances. These large differences are reflected in the yield and specific capacity of wells completed in the limestone aquifers and the discharges of springs that issue from these aquifers. The yields of wells completed in the Mississippian aquifers commonly range from 5 to 50 gallons per minute, and maximum yields range from a few hundred to, rarely, several thousands of gallons per

minute. However, such openings constitute only a small part of the rock and might be difficult to locate (Lloyd and Lyke 1995). . . Three caves occur within 200 feet of the project right-of-way, and a one large sinkhole occurs within the right-of-way. The majority of public drinking water for Putnam County is supplied by surface water with a small population within the county supplied by a groundwater source (TDEC 2002b). . . Residential wells may occur near the project area (TVA Draft EA).

The following comment from TVA's Draft Assessment is incomprehensible. While this statement implies that no Karsts features are located where there will be proposed access roads, since the entire mountainous area covered by the proposed transmission line has Karsts features, this is impossible.

No karst features were found within the areas of the proposed access roads. Neither the proposed transmission line no the proposed access roads are located not within a state designated source water protection area. Residential wells may occur near the project area (TVA Draft EA).

Trees and Contiguous Forest

About 50 percent of the ROW for the proposed transmission line, approximately 32 acres, is forested. The magnitude of this environmental damage alone should require a full NEPA study. The dismissing of the importance of these trees because Putnam County has a large number of trees is arbitrary and cupreous. According to the organization, the Dogwood Alliance, protection of trees on the Cumberland Plateau is especially important. The Cumberland Plateau is a biologically, ecologically and culturally significant area that faces critical environmental issues," said TDEC Commissioner Betsy Child. "Now is the time to protect the land, air and water in this area through conservation and sustainable development practices".

Wetlands

There are several wetlands in the proposed right of way and insufficient plans to protect the wetlands have been made. Also water from the area Karsts region drains into Booger Swamp Protected AREA. We request that a full NEPA be conducted including dye studies of all caves and sink holes along the route.

Global Warning

The draft TVA EA does not adequately address global warning. To say that a no build option is to actually build anyway does not take into account global warning. What about the loss of 32 acres of trees? Not fully taking into account global warning with the information about the danger posed by global warming that is available is irresponsible as well as a matter demanded by the courts.

Cultural Issues

Again the information included in the Draft Environmental Assessment seems both arbitrary and cupreous. Information was not included about the historic horse and buggy mail route crossed by the transmission line and limited information was provided in regard to Native Americans.

Native American

Despite the fact that we provided substantial documentation of artifacts recovered along and around the projected transmission line and expert letters about the presence of extensive Native American habitation of the region, no mention is made of the Native American burial cave in the area or of Native American artifacts found along the route. The importance of this area for Native Americans has been reported in other TVA publications but the importance of this area for Native Americans was not acknowledged and studied for this report. Only a Level 1 survey was conducted of the area and the results of this shovel test was not included in the report. We would like to see a complete copy of the TVA contracted archaeologists report and also a complete copy of the TVA contracted biologists report. We were told that the full archaeologist report along with an explanation of methodology would be included in the draft Environmental Assessment. The absence of this information again is arbitrary and cupreous. The withholding of this information makes commenting on the report very difficult. Again a complete archaeological study of this region merits a complete NEPA study. The complete archaeological report along with our report and our archaeological findings should have been presented to all Native American tribes and groups in Tennessee. Section 106 of the National Historic Protection Act and other federal laws pertaining to Native Americans require TVA to consult with Native nations. The only mention of archaeological resources is the following:

Seven previously unidentified archaeological resources (40PM121 through 40PM127) were identified during the archaeological survey (Hockensmith 2007). These archaeological resources are considered ineligible for listing in the NRHP.

Information is not provided about these sites that would allow independent archaeologists and Native Americans to determine whether these sites are important. The Hockensmith report was not included along with the draft EA. See the letter from Randy Williams from the Upper Cumberland Development District that indicates that the route would impact an old Indian route through the area. Also, the work of Jay Franklin describes archeological sites and a burial cave in the area-yet Native Americans were not consulted. This alone, should require a full NEPA study.

Historic Horse and Buggy Mail Route

The fact that TVA did not mention in the draft EA the last horse and buggy mail route for the state of Tennessee despite the fact that we provided ample evidence in our Buck Mountain Community Organization Report Opposing Proposed TVA/UCEMC High Voltage Power Line Across Buck Mountain and on our website, www.notvapowerline.com of this mail route and its importance. We are currently in the process of working with Randy Williams, who was referred to us by TDEC, on getting this listed in the historic register. See the included letter from Randy Williams about the eligibility of this site for the Historic Register.

Health Issues

Along with the traditional concerns of high voltage power lines, there are additional health concerns with the preferred route that has been selected. Health issues such as childhood leukemia are widely documented. However, studies paid for by power companies claim that there is no health impact from power lines. Of course, tobacco companies for years paid for studies that said that cigarette smoking was not hazardous to one's health.

Additional health issues include the use of pesticides along the route. Even though TVA says that only EPA approved pesticides will be use, we do not know of any EPA studies that showed the health impact of people repeatedly drinking these pesticides in their ground water. In a Karsts region such as this where people still get their drinking water from wells and streams, this is a highly dangerous situations. Numerous lives could be impacted.

In addition to these general health concerns, I have several additional concerns. First, I am highly sensitive to chemicals and have difficulty breathing when exposed to chemicals. Spraying along this route could kill me. My husband has already been offered by one attorney to take my wrongful death suit once TVA or one of their subcontractors forgets and sprays along the route. It only would take one spraying and I could be dead. See the letter from my doctor, Dr. Donald Grisham. He has stated that spraying within a one-mile radius from house would be dangerous. Of course on a windy day or with different sizes of droplets or with a down draft from the propellers the herbicide could travel several miles.

Another health issue for me as a diabetic is the impact of high voltage power lines on continuous glucose monitoring and insulin pumps. Again, if the high voltage power line causes my continuous glucose monitor to not work properly by not alerting me to either a high or a low blood glucose level, I could go into a coma or die. A similar situation could happen with my insulin pump which cannot even be exposed to MRI's. No research has been conducted on continuous glucose monitors and high voltage transmission lines.

Ada Haynes