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FINAL ENVIRONMENTAL IMPACT STATEMENT
VOLUME 2

**RESPONSES TO COMMENTS
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT

MOUNTAIN RESERVOIRS LAND MANAGEMENT PLAN
Chatuge, Hiwassee, Blue Ridge, Nottely, Ocoees 1, 2, and 3, Apalachia,
and Fontana Reservoirs
Georgia, North Carolina, and Tennessee**

PREPARED BY:
TENNESSEE VALLEY AUTHORITY

JULY 2009

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Responses to Comments on the Draft Environmental Impact Statement

TVA received letters, electronic mail, and oral statements during the comment period on the draft environmental impact statement (DEIS) from August 15 to October 31, 2008. Following release of the DEIS, TVA held an open house public meeting at Blairsville, Georgia, on August 27, 2008. In total, 722 sets of written and oral comments were received from approximately 575 individuals, seven citizens' organizations, two local governments, three federal agencies, nine state agencies, one local government agency, and one federally recognized tribe. TVA has considered all of the substantive comments it received on the DEIS and has either responded to them as set forth below or modified the text of the final environmental impact statement (FEIS) as appropriate.

The comments received and TVA's responses to them appear below. Due to the large number of comments, those comments that were very similar were consolidated and their key points were summarized. These comments are identified below as "Aggregated Comments," and a single response is provided for each of these aggregated comments. The aggregated comments represent the collective issue raised by a number of commenters, and TVA has tried to capture those issues as accurately as possible. To the extent that a unique issue was raised in a comment, that unique issue appears separately, even if the remainder of the comment is aggregated.

In other cases, the comment as received is presented. The names of those individuals and organizations providing comments are provided immediately after the comment. All original comments and letters are available from TVA upon request.

TVA has carefully reviewed and considered all comments received. For the reader's convenience, comments were organized into logical topics and themes. Their order of appearance has no bearing on their importance.

The majority of the public comments on the DEIS expressed concerns about Chatuge Reservoir. Several comments dealt with potential environmental effects that could occur on Hiwassee Reservoir. Few comments dealing with the other mountain reservoirs or the adjoining properties were received.

Many commenters stated concerns about the potential effects of the allocation and possible subsequent development of Parcels 10, 52, and 77 on Chatuge Reservoir under Alternative C. However, some commenters supported recreational development on Parcels 52 and 77. The major development-related concerns stated included potential adverse effects to water and air quality, loss of habitat for terrestrial life, degradation of local visual and aesthetic quality, increased noise, loss of income from tourism, and decreased residential property values. Other comments focused on policy-related issues such as the need for additional development or the need for parcel allocation in general. To assist the reader, comments were categorized into the following topical areas:

- **Agency Comments** - comments from federal and state agencies
- **General Comments** - public comments that do not pertain to a particular reservoir

- **Chatuge Reservoir Comments** - public comments regarding Chatuge Reservoir generally
- **Chatuge Parcel 10 Comments** - public comments regarding Chatuge Parcel 10 and the potential environmental effects of allocating this parcel to Zone 5 for possible industrial use
- **Chatuge Parcel 52 Comments** - public comments regarding Chatuge Parcel 52 and the potential environmental effects of allocating the parcel to Zone 6 for possible developed recreation use
- **Chatuge Parcel 77 Comments** - public comments regarding Chatuge Parcel 77 and the potential environmental effects of allocating this parcel to Zone 6 for possible developed recreation use
- **Other Reservoirs Comments** - public comments regarding land use and allocations on Hiwassee, Blue Ridge, Ocoees 1, 2, and 3, Apalachia, and Fontana reservoirs
- **Substation Comments** - public comments regarding the 1.4-acre parcel on Chatuge Reservoir proposed for sale at public auction for a substation site

A listing of individuals and organizations that commented on the DEIS is provided below. The names of individuals that provided a particular comment are provided following that comment.

A few comments were submitted with names that could not be determined. In these cases, the commenter name is identified as "illegible." Similarly, several comments were submitted without a name, and in such cases, the commenter's name is identified as "unknown."

TVA received eight petitions from the public during the comment period. These petitions included a total of 842 signatures and consisted of the following: Petition #1 (72 signatures), Petition #2 (111 signatures), Petition #3 (86 signatures), Petition #4 (107 signatures), Petition #5 (124 signatures), Petition #6 (9 signatures), Petition #7 (64 signatures), Petition #8 (the Towns County Homeowners Association, 269 signatures). In those cases where the comment was part of a petition, the petition number was provided.

Agency Comments

U.S. Environmental Protection Agency (USEPA)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET
 ATLANTA, GEORGIA 30303-8960

September 23, 2008

Doc. Type: _____

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Mr. Kenneth P. Parr
 Senior NEPA Specialist
 Tennessee Valley Authority
 1101 Market Street, LP 5U
 Chattanooga, TN 37402-2801

Subject: EPA NEPA Review Comments on TVA's DEIS for "Mountain Reservoirs Land Management Plan"; Chatuge, Hiwassee, Blue Ridge, Nottely, Oconee 1, 2 & 3, Apalachia, and Fontana Reservoirs; Fannin, Towns, and Union Counties, GA; Swain County, NC; Polk County, TN; CEQ #20080309; ERP #TVA-E65082-00

Dear Mr. Parr:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject Tennessee Valley Authority (TVA) Draft Environmental Impact Statement (DEIS) in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. In this DEIS, TVA proposes a Mountain Reservoirs Land Management Plan (MRLMP) for managing the above-referenced nine reservoirs in Georgia, North Carolina and Tennessee over the next 10 years. Overall, about 6,222 acres would be included in the planning process. Of these, about 5,146 acres are already committed lands while about 1,076 acres (17%) remain uncommitted. Currently, committed uses are not proposed to be changed by the MRLMP (pg. 18) and include landrights granted by TVA for easements, transmission lines, dam reservations and other properties.

Background

With the exception of Fontana Reservoir, all mountain reservoirs are currently managed under the Forecast System developed in 1965. Unless TVA selects Alternative A for no action, an MRLMP would replace the Forecast System pursuant to one of two presented action alternatives – Alternative B or C. At this time, TVA has not identified a NEPA preferred alternative (pg. 36) and requests public input. In essence, Alternative B would allocate more land parcels to the natural resource and sensitive area zones while Alternative C, although similar to B, would allocate 105.4 acres differently. Specifically, C would allocate 27.2 acres to the industrial zone (Zone 5) and 78.2 more acres to the developed recreation zone (Zone 6), instead of all 105.4 acres remaining allocated to the natural resource conservation zone (Zone 6) under Alternative B. TVA's re-allocation for these 105.4 acres to Zones 5 and 6 for Alternative C was offered for consideration in this EIS in response to public comments/requests. The seven specific allocation zones for both Alternatives B and C are as follows:

EPA (continued)

- * Zone 1 – Non-TVA Shoreland
- * Zone 2 – Project Operations
- * Zone 3 – Sensitive Resource Management
- * Zone 4 – Natural Resource Conservation
- * Zone 5 – Industrial
- * Zone 6 – Developed Recreation
- * Zone 7 – Shoreline Access

Noteworthy public trends regarding the preferred management of mountain reservoir lands were expressed during TVA’s scoping process (Table 1-3: pg. 9). The participating public generally felt that the current land allocation for the mountain reservoir area fell in the “about right amount” category, i.e., “the majority of the 473 respondents indicated a general preference for no changes in existing land use” (pg. 8). Exceptions to this trend were strong preferences for “mountain bike trails” (324 respondents) and “hiking trails (dirt)” (228 respondents). Moreover, there was a strong belief (206 respondents) that there was “too much land” already dedicated to “industry/light manufacturing”. Similarly, 97 respondents felt that the current industrial land use was in the “about right amount” category, while only 7 respondents voted for the “need more land” category and 59 respondents had “no opinion”. Based on these results, it appears that the responding public believes that the existing land use should generally not change (particularly to industrial/light manufacturing land use) with the primary exception of adding more biking/hiking trails.

Alternatives

EPA-1

EPA believes that updating the present Forecast System is appropriate for the management of mountain reservoirs and therefore does not favor Alternative A for no action. We also prefer action Alternatives B and C over A because B and C re-allocate several acres under the Forecast System from industrial and natural resource conservation to more protective natural resource protection and sensitive resource management (pg. 23). However, although Alternative C has several features similar to B, we prefer B from a water quality perspective (see further discussion below). In contrast to Alternative C, Alternative B proposes no allocation to industrial shoreline development. For the present planning, specific changes between B and C would only occur in the Chatuge Reservoir in Georgia and the Hiwassee Reservoir in North Carolina. As summarized in the DEIS (pg. 24) and below, 105.4 acres of land allocated to the conservation of natural resources (Zone 4) in Alternative B would be re-zoned to either industrial use (Zone 5) or developed recreational use (Zone 6) for the Chatuge and Hiwassee Reservoirs:

EPA-2

EPA-3

Chatuge Reservoir (GA):

EPA-4

- Parcel 10 (27.2 ac) to Zone 5 (apparently new electric cooperative project)
- Parcel 52 (7.4 ac) to Zone 6 (apparently new boat launch, fishing piers, trails)¹
- Parcel 77 (66.4 ac) to Zone 6 (apparently new multiple field sports complex)

¹ Parcel 52 also includes a proposed 2-acre substation site already being considered prior to the current planning process.

EPA (continued)

Hiwassee Reservoir (NC):

- Parcel 34 (2.4 ac) to Zone 6 (apparently new wade fishing area)
- Parcel 49 (2.0 ac) to Zone 6 (extension of existing Heritage Riverwalk Trail)

General Reservoir Management Comments

<p>Presuming that Zones 1, 2 and 7 are a given for TVA reservoirs, Zones 3-6 would allow some flexibility for re-allocation. Of these, EPA prefers Zone 3 to protect wetlands, habitat and other sensitive areas; Zone 4 to protect wildlife, shorelines and other natural resource areas; and, to a lesser degree, Zone 6 for public recreation of the reservoir resource. For Zone 6, we recommend that the level of developed and dispersed recreation be somewhat tempered to ensure or enhance good water quality as well as other natural reservoir features such as the preservation of the ambient noise environment (e.g., minimize recreational noise from jet ski and power boat sources).</p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-5</div>
<p>We also believe that shoreline recreation be water-dependent or water-related (e.g., water access needs, marinas, fishing, swimming, etc.) and sited appropriately (e.g., marinas sited only in well-circulated areas – rather than dead-end embayments or branches – that require little or no dredging, and water access sites located only in areas without fringe wetlands). As a rule, the emphasis of such projects should also be on the expansion of existing facilities rather than the development of greenfield sites.</p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-6</div>
<p>While we understand TVA’s mandate for continued economic growth of the Tennessee Valley, we believe that industrial use of shorelands (Zone 5) should be limited to appropriate industrial/commercial use that requires water access (e.g., barge terminals that serve “clean” cargo materials such as shipment of grain, timber, rock, etc. that have a low potential for water quality degradation). Residential land use along shorelines should also be restricted to reduce potential runoff and septic tank seepage into reservoirs. Existing residential plots should also retain natural shoreline buffer strips. Overall, EPA believes that actions within all zone designations should minimize shoreline disturbance in terms of development (clearing, water access, retainer walls, piers and boathouses, runoff and point source discharges, etc.). As such, we appreciate TVA’s development and implementation of its Shoreline Management Policy (SMP) and Clean Marinas Initiative.</p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-7</div>
<p>Despite its significance, it should be noted that shoreline management is the last buffer zone to preserve the water quality of a reservoir. Therefore, in addition to shoreline management, back-lying areas such as shorelands and the watershed in general should also be managed. This is particularly important for mountain reservoirs since they are often rocky, steep-sloped and vulnerable to receiving runoff laden with sediments and/or other pollutants from development or agricultural fields. While TVA may not own these shorelands, TVA has an excellent opportunity to participate as a prominent community stakeholder in the development and implementation of watershed management plans for the mountain reservoirs. Based on previous NEPA reviews of other TVA reservoirs, we assume that TVA is already active in this regard. The Final</p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-8</div>
<p></p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-9</div>
<p></p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-10</div>
<p></p>	<div style="border: 1px solid black; padding: 2px; width: fit-content; margin: 0 auto;">EPA-11</div>

EPA (continued)

EIS (FEIS) should address this and discuss the water quality benefits of managing shorelands and watersheds.

NEPA Process

Parcel 10 Re-Zoning

Based on Table 2-8 (pg. 24), Parcel 10 of the Chatuge Reservoir was requested for re-zoning by "BRMEMC" for industrial use. Appendix B (pg. 292) defines "BRMEMC" as the Blue Ridge Mountain Electric Membership Corporation and Chapter 1 (pg. 10) had previously defined BRMEMC for a 2-acre substation project being considered prior to and independent of the planning process. Appendix B (pg. 295) also lists the public hearing request for re-zoning and that that request was supported by another hearing respondent.

Although the requester for re-zoning Parcel 10 was identified, EPA is more concerned that the type of industrial project – and its impacts – are not clear or evaluated in the DEIS. Presuming that the BRMEMC cooperative would be interested in siting conventional power cooperative facilities at Parcel 10 (e.g., substation, transmission line, etc.), it remains unclear why such potential uses would require a shoreline location and a fairly large amount of land (27.2 ac). It is also unclear if such a power project would induce additional power needs and secondary developmental impacts along the reservoir.

EPA-12

EPA-13

From a NEPA perspective, disclosing the nature of the requested industrial use of Parcel 10 and its predicted impacts would have been appropriate in the DEIS for impact documentation. However, it is possible at this time that TVA may not be fully aware of the specific project that BRMEMC is proposing since page 81 states that "[d]epending on the type of industry, Alternative C may have more potential noise impacts on Chatuge than Alternative B." Nevertheless, if Alternative C is pursued in the FEIS, the FEIS should provide additional disclosure and evaluation of project impacts for Parcel 10.

EPA-14

Future Re-zoning Requests

Beyond the implementation of the proposed MRLMP with its five public re-zoning requests, we expect (based on previous EPA reviews of TVA reservoir land management plans) that future re-zoning requests will likely also be made of TVA over the 10-year term of the MRLMP. As referenced above, we already note (pg. 10) that due to a power need projected for June 2009, a 2-acre portion of Parcel 52 of the Chatuge Reservoir considered in the current EIS, "...is being considered for use as a substation site and is being evaluated independently from the current land planning effort." This 2-acre parcel would presumably also be re-zoned for industrial use (Zone 5). We suggest that the FEIS discuss what future requests might be expected and TVA's policy in this regard.

EPA-15

EPA-16

We request that any future re-zoning requests that may be considered by the TVA Board of Directors be scrutinized to benefit reservoir water quality. We are encouraged (pg. 19) that TVA would "consider changing a land use designation outside the normal planning

EPA (continued)

process only for water-access purposes for industrial or commercial recreation operations on privately owned back-lying land or to implement TVA's SMP." We also understand, at least for the present EIS (pg. S-3), that "TVA's Land Policy does not allow for additional land to be provided for residential use, and therefore, the amount of shoreline available for residential use will not change as a result of the land planning process." Finally, we note (pg. 78) that "...future proposed actions are subject to environmental review..."

EPA-17

Regarding environmental reviews, it is unclear if these would be internal to TVA or if TVA proposes additional NEPA documentation for each request that would tier off the current EIS. Page 87 refers to future NEPA reviews in stating that "[p]otential future development proposals would be reviewed under NEPA and would require the use of BMPs." In contrast, TVA's mitigation commitments (pg. 37) for the present requests in the current planning process include apparent internal TVA environmental reviews for air quality effects "prior to approving any industrial development of this land." The FEIS should clarify if the environmental reviews are internal to TVA or are required by NEPA.

EPA-18

Overall, we recommend that only reasonable requests that are water-dependent or water-related and are typically expansions of existing projects (as opposed to greenfield areas) be considered for potential approval. Any industrial re-zoning should also largely be limited to barge terminals for cargo having a low potential for water contamination. Non-water-dependent but potentially necessary industrial/commercial facilities, such as power facilities, should be sited away from shorelines to the extent possible. If NEPA does not apply, potential future re-zonings should also require a TVA environmental review once requested projects are specifically defined.

EPA-19

EPA-20

EPA-21

Water Quality Concerns

Industrial Use

EPA has potential water quality concerns for the re-zoning of Parcel 10 in the Chatuge Reservoir to industrial use (Zone 5). From a practical perspective, we recognize that the proposed Zone 5 acreage (105.4 ac) is a relatively small footprint compared to the overall acreage being reviewed (6,222 ac). It is also only one parcel of land (Parcel 10) on one of the nine reservoirs (Chatuge Reservoir). However, as the only parcel that would be allocated to industrial use in the present planning process, it could set a precedent for industrial use along mountain reservoirs. Based on our review of previous land management plans for other TVA reservoirs, we also assume that TVA would be open to considering future public requests for re-zoning for development under the proposed MRLMP, which may or may not expand on this precedent for re-zoning to industrial use. We already note that the requested 2-acre substation noted above is also for industrial use.

EPA-22

Although the requested industrial use for Parcel 10 along the shoreline of the Chatuge Reservoir need not have significant water quality impacts, the proposed use of these 27.2 acres is not clarified in the DEIS such that the potential for water quality issues

EPA-23

EPA (continued)

exists. Based on Figure 2-1, Parcel 10 is situated in an embayment area (Wood Creek) where circulation may be somewhat limited. The FEIS should discuss if the proposed industrial use would entail effluents and/or runoff and if circulation patterns near Parcel 10 would allow for adequate flushing and assimilation of such effluents. For example, where is the original streambed (mainstem) in the reservoir relative to Wood Creek and does the feeder creek entering Wood Creek near the “Otis Burdette” parcel (Fig. 2-1) have enough annual inflow to generate flushing?

Even without any potential industry being sited at Parcel 10, we note that Chatuge Reservoir has existing water quality concerns. Currently (and typically since 1998) TVA rates the ecological health of the Chatuge Reservoir as “poor” (pg. 106), which includes low 2006 water quality ratings in two portions of the reservoir for dissolved oxygen (“poor”), chlorophyll (“poor” and fair”) and sediment (“fair” and “poor”) (pg. 107). Chatuge also has a growing number of shoreline residential plots that are being developed, which could exacerbate these water quality problems. Specifically, the reservoir not only has the greatest percentage (57%) of shoreline open for residential development of all nine mountain reservoirs, it also has a large percentage (74%) of open shoreline that is already developed (pg. 42). Moreover, it is unclear if the remaining undeveloped residential plots would be developed according to TVA’s SMP – which promotes water quality – or if they would be grandfathered (e.g., parcels were platted prior to the SMP policy, but have not be developed yet). As such, potential additional residential development could continue the water quality problems of the Chatuge Reservoir such that a re-zoning of Parcel 10 to an industrial use from a natural resource conservation use seems inappropriate at Chatuge Reservoir. Cumulative water quality effects from industrial and residential development on a reservoir already known to have poor ecological health with fair-to-poor water quality could therefore result. Although the DEIS (pg. S-8) does not predict a change in ecological health with Alternative C, any proposed re-zonings for Chatuge Reservoir should arguably be designed to improve water quality rather than only maintain it.

EPA-24

EPA-25

Beyond water quality concerns, the development of Parcel 10 would require the logging of high-quality “old growth” habitat (pg. 51) and the resultant displacement of its associated wildlife. Such wildlife could potentially include the federally-protected Indiana bat that ranges in the mountain reservoir project area (pg. 54).

Recreational Use

Some of Alternative C’s proposed re-zoning changes from Zone 4 (Natural Resource Conservation) to Zone 6 (Developed Recreational) are also of water quality concern to EPA. Overall, as discussed above, EPA suggests that shoreline recreational projects be water-dependent or water-related, and be expansions of existing recreational sites as opposed to new (“greenfield”) projects. Based on this guideline, our concerns are primarily for Parcel 77 (multiple sports field complex) which is proposed for a less water-dependent use than the present dispersed recreation at the site (including bank fishing; pg. 87). Moreover, as indicated in the DEIS (pg. 92), there are also “uncertainties regarding need” associated with this proposal since it already serves as

EPA-26

EPA-27

EPA (continued)

a recreational site. Secondly, Parcels 34 (wade fishing) and 52 (boat launch) both appear to be greenfield projects even though they are water-dependent activities. Only Parcel 49 (extension of an existing riverwalk) appears to be both water-related and not a new site. Moreover, the riverwalk is only a scenic appreciation of reservoir waters that need not disturb its water quality.

EPA-28

Beyond water quality concerns, Parcel 77 also contains a stand of Butternut trees which is a species of Special Concern in Georgia (pg. 97).

A Prospective “Alternative D”

Given EPA’s potential water quality concerns for the proposed re-zoning to industrial land use (Zone 5) and, to a lesser degree, to developed recreational land use (Zone 6), we find that the presented action alternatives (B&C) are unnecessarily constrained. That is, presenting decision-makers with an additional alternative(s) that provides for some re-allocation in areas where the impacts are expected to be minimal while avoiding development in areas with higher likely impacts, could lead to better decisions by not imposing an “all or nothing” type approach (i.e., B vs. C). Specifically, while EPA still prefers Alternative B, another alternative could be presented in the FEIS that would modify B to a lesser degree than Alternative C. For example, a prospective “Alternative D” might only propose the re-zoning for Parcel 49 since it is an expansion of an existing riverwalk as opposed to an industrial re-zoning or a new developed recreation site. Other options may be possible depending on the type of parcel and its impacts. The goal of such an intermediate alternative between B and C would be to minimize environmental impacts (although not to the extent of B) and maximize recreational benefits (although not to the extent of C).

EPA-29

Summary

EPA supports TVA’s decision to upgrade its mountain reservoir management system. TVA’s search for an appropriate MRLMP alternative is consistent with its environmental stewardship of the Tennessee Valley. Overall, EPA prefers Alternative B over C since it avoids the re-zoning of natural resource lands (Zone 4) to industrial lands (Zone 5) and limits the amount of re-zoning from natural resource and sensitive area lands (Zones 3 & 4) to developed recreation (Zone 6). In general, EPA’s reservoir management strategy is based on water quality preservation or enhancement, which translates into limited industrial and developed recreational use along reservoir shorelines. In general, shoreline development should be water-dependent/water-related and be expansions of existing developments as opposed to new sites.

Although the requested industrial use for Parcel 10 along the shoreline of the Chatuge Reservoir need not have significant water quality impacts, the FEIS should better clarify the actual power company project being proposed for Parcel 10 and its potential impacts. This discussion should address overall project need, the need for a shoreline versus a more upland location, potential effluents from the industrial project, induced impacts resulting in further development along the reservoir, as well as the project’s cumulative

EPA-30

EPA (continued)

8

impacts to shoreline, shoreland and watershed resources. The decision-making process should also consider that the Chatuge Reservoir is already in overall poor ecological health, including only fair-to-poor water quality. Accordingly, any projects considered for Chatuge should be designed to preserve or enhance its water quality as opposed to potentially degrading its water quality.

Regarding the four proposed re-zonings for recreational use in the Chatuge and Hiwassee Reservoirs (Parcels 34, 49, 52 & 77), we find that their need (77), need for a shoreline location (77), and need for a new as opposed to greenfield site (34 & 52) should be reconsidered from a water quality perspective. In contrast, Parcel 49 appears to be a reasonable project since it would expand an existing riverwalk for scenic appreciation of reservoir waters that need not disturb its water quality. This project would also be consistent with TVA's mandate for public recreational development and somewhat consistent with the public's scoping preference for more trails. As part of its decision-making process, TVA may also wish to consider the addition of another action alternative (Alt. 'D') that is bracketed by Alternatives B and C. The goal of such an intermediate alternative would be to minimize environmental impacts (although not to the extent of B) and maximize recreational benefits (although not to the extent of C). The specific parcels incorporated within such an Alternative D would depend on their type and impacts, but might include Parcel 49 currently not proposed for Alternative B.

EPA DEIS Rating

EPA-31

We rate this DEIS as an "EC-2" (i.e., Environmental Concern, additional information requested). We base this rating on our concerns for the potential environmental impacts from the re-zoning proposals in Alternative C. We also request that additional information be provided in the FEIS, such as the kind of industry proposed for Parcel 10 and its potential water quality and other impacts.

EPA appreciates the opportunity to review this FEIS. Should you have questions on our comments, please contact Chris Hoberg of my staff at 404/562-9619 or hoberg.chris@epa.gov.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

EPA (continued)

DETAILED COMMENTS

* Wetlands – We note that the proposed re-zoning requests for Alternative C and all other presented alternatives would not result in impacts to wetlands (pp. S-6, 33). While a conclusion of no project impacts on wetlands is commendable, Alternative B would nevertheless be preferable since it would allocate more acreage to Zone 3 and therefore not only not impact, but also protect a greater number of wetland acres than Alternative C. Also, since pocosin (perched) wetlands are often found in mountainous areas, the FEIS should indicate if any such wetlands are in the area and if they would be impacted by any of the alternatives.

EPA-D1

* Environmental Reviews – As discussed in the cover letter, TVA’s proposed mitigation commitments for this EIS include a TVA environmental review “prior to approving any industrial development of this land” for air quality effects (pg. 37). It is unclear why such a review would be limited to air quality effects given that water quality, habitat loss and other concerns could also be affected by re-zonings to industrial or recreational land use.

EPA-D2

* Climate Change – We appreciate the reference to “global climate change” on page 49. The reference suggests that old growth stores carbon that “...would otherwise contribute to global climate change (Salk 2005).” We agree. Studies are now showing that old growth forests are not carbon neutral. Moreover, the cutting of old growth would release large amounts of stored CO₂.²

EPA-D3

* Cumulative Impacts – Section 3.1.3.2.2 indicates that because Alternative C would only result in land use changes on five parcels, wildlife populations in the area would not be cumulatively impacted. While this may be the case, an explanation based solely on the relatively limited size of the modifications proposed does not fully address the potential for the action to result in cumulative impacts to wildlife in the project area. The FEIS analysis should include a discussion of any reasonably foreseeable future actions (federal or non-federal) which may, when considered in addition to the proposed changes discussed therein, combine to result in a cumulative impact.

EPA-D4

* Land Use Agreements – Table 3-3 (pg. 43) provides information on land use agreements applicable to the TVA parcels at issue in the DEIS. One of the categories of land use agreements listed is “sufferance agreements.” This presumably refers to agreements between TVA and other parties to allow those other parties to occupy TVA land without otherwise holding express property rights thereto. It appears that the table accounts for these agreements and their corresponding acreages twice (once under the “Project Operations” subheading, and once under the “Other” subheading). If this is the case, the table should be corrected in the FEIS to reflect the accurate number of

EPA-D5

² *Old Forests Help Curb Global Warming Too: Study.* September 10, 2008. Article at: http://news.yahoo.com/s/afp/20080910/sc_afp/scienceenvironmentclimatewarmingforests

EPA (continued)

agreements and acres; if not, the table should provide why the category is represented twice.

EPA-D6

* Public Scoping Trends – The public expressed a strong preference for additional biking/hiking trails (pg. 9). It is unclear if the requested re-zoning for Chatuge and Hiwassee Reservoirs offered such additional trails other than Hiwassee Parcel 49 and Chatuge Parcel 52 (pg. 24). EPA will defer to TVA in this regard.

* Editorial Comments – Table 2-10 (pg. 33) provides a summary of environmental impacts for Chatuge and Hiwassee Reservoirs. Some of the information provided in this table is inconsistent with information provided in other portions of the DEIS.

EPA-D7

○ *Wetlands*: Under the “Wetlands” row in Table 2-10, the field for “Alternative C” provides that “No wetlands [are] associated with... Hiwassee Parcel 34.” This is consistent with a description of the parcel provided on page 122. However, at other points in the DEIS (pg. 10 & 130), Parcel 34 is described as containing “a narrow fringe riparian emergent wetland.” Although this inconsistency should be addressed in the FEIS, we assume that wetlands exist in the project area but that the proposed re-allocations would not impact those wetlands.

EPA-D8

○ *Threatened and Endangered Species*: The “Alternative C” column in Table 2-10 provides that “no adverse affects on listed plants or terrestrial animals are anticipated” on the Chatuge and Hiwassee reservoirs. However, Section 3.1.4.2 (pg. 59) provides that under Alternative C, Parcel 10 (which contains habitat suitable for bald eagles and Indiana bats) could be impacted by the anticipated subsequent industrial development of the tract. To clarify any adverse project impacts to federally-protected species, we recommend additional coordination with the U.S. Fish and Wildlife Service, particularly for proposed re-allocations that may require land clearing of suitable endangered species habitat, such as Parcel 10. In addition, Table 2-10 should indicate whether the phrase “Threatened and Endangered Species” refers to only federally-listed species or to both federal and state listed species. The bald eagle discussion in Section 3.1.4.1 (pg. 58) of the DEIS should be corrected to reflect the current listing status of bald eagles in Georgia. Pursuant to Georgia’s Endangered Wildlife Act, bald eagles are currently listed as threaten not endangered (see GA Code § 391-4-10-.09(2)(n)).

For the reader's convenience, the labeled comments in the letter above are repeated below in paraphrased form.

EPA-1. EPA believes that updating the present Forecast System is appropriate for the management of mountain reservoirs and does not favor Alternative A for no action.

TVA Response:

Comment noted.

EPA-2. EPA prefers action Alternatives B and C over A because B and C re-allocate several acres under the Forecast System from industrial and natural resource conservation to more sensitive resource protection and sensitive resource management.

TVA Response:

Comment noted.

EPA-3. EPA prefers Alternative B from a water quality perspective.

TVA Response:

Comment noted. Because under Alternative B there would be essentially no change in land use from a parcel's current use, adoption of this alternative has a very low potential to affect water quality.

EPA-4. Under Alternative C, Parcel 10 on Chatuge would be allocated to Zone 5 for a new electric cooperative project, Parcel 52 to Zone 6 for new boat launch, trails, fishing piers, and trails, and Parcel 77 to Zone 6 for a new multiple-field sports complex.

TVA Response:

As stated in Section 2.2.3 of the FEIS, Alternative C would involve allocating Parcel 10 on Chatuge Reservoir to Zone 5. This allocation for industrial use was in response to a request by Blue Ridge Mountain Electric Membership Corporation (BRMEMC). BRMEMC had indicated an interest in acquiring access to the reservoir for a water intake that would serve the nearby Clay-Towns County Industrial Park. BRMEMC's plans did not include traditional industrial uses, e.g., the construction of manufacturing plants, for this parcel. However, because allocation to Zone 5 could eventually result in requests for such industrial use, the potential effects of on-site industrial facilities are considered for Parcel 10.

Under Alternative C, Parcel 52 would be allocated to Zone 6 (Developed Recreation). This allocation was in response to requests from Towns County, the City of Hiawassee, and the Georgia Department of Natural Resources for a recreation area that included a boat launch, fishing piers, and trails (see Table 2-8 in the FEIS). Likewise, the proposed allocation of Parcel 77 for developed recreation use was based on a request from Towns County and the City of Hiawassee. The city and the county expressed an interest in the development of ball fields and associated public recreation facilities on Parcel 77. TVA has not received a formal request for the development of recreational facilities on either parcel.

Under Alternative B, these three parcels are allocated to Zone 4 (Natural Resource Conservation). Under Alternative D, the Blended Alternative, which was developed during preparation of the FEIS, Parcel 10 and Parcel 77 are allocated to Zone 4, Parcel 52 is allocated to Zone 6, and Parcel 52a will remain allocated to Zone 4.

EPA-5. EPA prefers Zone 3 to protect wetlands, habitat and other sensitive areas; Zone 4 to protect wildlife, shorelines and other natural resource areas; and Zone 6 for public recreation.

TVA Response:

Comment noted. Most parcels containing wetland areas or other sensitive natural resources needing protection would be allocated to Zone 3 under all of the action alternatives. Allocation to Zone 4 (Natural Resource Conservation) is appropriate for those parcels without sensitive resources. Zone 6 (Developed Recreation) is an appropriate allocation for parcels suitable for and capable of supporting water access provided by a public agency, large public recreation, and commercial recreation development. These allocations are summarized in Table 2-1.

EPA-6. EPA recommends that the level of developed and dispersed recreation be somewhat tempered to enhance good water quality and other features such as noise reduction for jet skis and power boats.

TVA Response:

Comment noted. Dispersed recreation can and does occur on lands that are allocated to all zones except, in many cases, Zone 5 (Industrial).

Standard measures to protect water quality are typically imposed as conditions of approval for recreational developments on Zone 6 parcels. TVA exercises access control and may prohibit certain uses (e.g., ATV riding) that would affect water quality. TVA's ability to regulate boating is limited, as this is primarily the responsibility of the respective states.

EPA-7. Shoreline recreation should be water-dependent or water-related and sited in well-circulated areas (no dredging and no wetland impacts). Emphasis of such projects should be on expanding existing facilities rather than developing greenfield sites.

TVA Response:

The types of permissible recreational shoreline developments that can occur on parcels allocated to Zone 6 are summarized in Table 2-1 of the FEIS. In accordance with the TVA Land Policy, TVA favors new commercial recreation facilities that are water dependent. The need for any dredging and the potential for impacts to wetlands would be considered in TVA's case-by-case evaluation of requests for use of TVA land for developed recreation.

EPA-8. Zone 5 areas should be limited to uses that require water access (e.g., barge terminals that load "clean" materials having a low potential to degrade water quality).

TVA Response:

As stated in TVA's Land Policy and in Table 2-1, preference will be given to businesses requiring water access when considering requests for use of TVA land allocated to Zone 5. Because none of the reservoirs considered in this plan have locks that would permit commercial navigation access, TVA does not anticipate requests for barge terminals on any of these reservoirs.

EPA-9. Residential land use along shorelines should be restricted to reduce runoff and septic tank seepage into reservoirs.

TVA Response:

None of the land plan alternatives involve changing the amount of shoreline available for residential development. TVA regulates some impacts from

shoreline residential development through its Section 26a permitting and Shoreline Management Policy, but it has little control over development on back-lying lands.

EPA-10. All zone designations should minimize shoreline disturbance.

TVA Response:

Comment noted. The allocation of a parcel to a particular zone indicates that the parcel is capable of and suitable for the respective land use. Once a parcel is allocated, TVA may entertain requests from valid applicants for specific uses of that parcel. To be considered, the request must be for a proposed use that is consistent with the zone allocation. In considering a request, and prior to granting requests for use or transfer of a parcel, TVA will conduct an environmental review consistent with the National Environmental Policy Act (NEPA). The potential for environmental effects to various resources, including the amount of shoreline disturbance, associated with the implementation of the proposed land use are considered in that environmental review. Findings of the environmental review are considered in the decision to approve or deny the application. Zone allocations, in and of themselves, do not cause shoreline disturbance.

EPA-11. Back-lying areas such as shorelands and the watershed in general should be managed. The FEIS should address this and discuss the water quality benefits of managing shorelands and watersheds.

TVA Response:

TVA's management authority is limited to the land it owns, land over which it owns flowage easements, and structures subject to Section 26a permitting. Protection of water quality is a primary consideration in its management of these areas and structures. Although TVA has very limited management authority over privately owned lands in the watersheds around its reservoirs, it does cooperate with various public organizations and other government agencies to plan and implement measures to protect and improve water quality.

EPA-12. With regard to Parcel 10, it is not clear why such potential uses would require a shoreline location and so much land.

TVA Response:

BRMEMC requested the industrial allocation of Parcel 10 in order to construct a water intake to serve a nearby industrial park. Although this intake would not occupy the entire 27.2-acre parcel, Alternative C allocates the entire parcel for industrial use because the precise location and design of the intake is not known.

EPA-13. With regard to Parcel 10, it is unclear if such a power project would induce additional power needs and secondary development on the reservoir.

TVA Response:

As described in FEIS Section 3.2.1.2 and the response to Comment EPA-12, the industrial allocation of Parcel 10 under Alternative C responds to a proposal to construct a water intake and not a power facility. The construction of the water intake could potentially increase electrical power use in the industrial park, depending on the type of industries that locate there. The extent of such an increase is unknown at this time. As stated in FEIS Section 1.5.3 and Section 3.2.1.2 and in Tables 2-8 and 2-10, BRMEMC has withdrawn this request, and

Parcel 10 is allocated to Zone 4 (Natural Resource Conservation) rather than Zone 5 (Industrial) in Alternative D, TVA's preferred alternative.

EPA-14. With regard to Parcel 10, if Alternative C is pursued, the FEIS should provide additional disclosure and evaluation of project impacts.

TVA Response:

BRMEMC has withdrawn its request that TVA allocate Parcel 10 on Chatuge for industrial use. BRMEMC had expressed an interest in establishing access for a water intake to serve the nearby industrial park. This information is provided in Section 3.2.1.2 of the FEIS. Notwithstanding the withdrawal of the request, the foreseeable impacts of industrial development of Parcel 10, including impacts to the old-growth forest, are described in FEIS Sections 3.1.3 and 3.2.3. Further, if and when TVA receives an application requesting permission for a specific use of Parcel 10, TVA will conduct an individualized evaluation of that request, which would contain a detailed project description and evaluation of project impacts.

EPA-15. The FEIS should discuss what future requests might be expected on Parcel 10 and TVA's policy on this.

TVA Response:

The types of requests TVA would entertain for a parcel allocated to Zone 4 (to which Parcel 10 is allocated under Alternatives B and D) or Zone 5 (to which Parcel 10 is allocated under Alternative C) are summarized in Table 2-1. At this time, there are no pending requests for industrial or other use of Parcel 10. The FEIS has been revised to clarify this situation.

EPA-16. Future re-zoning requests should be scrutinized to benefit reservoir water quality.

TVA Response:

Comment noted. Potential effects to water quality would be considered if TVA receives future requests for rezoning of parcels.

EPA-17. Would additional environmental reviews be internal or in accordance with NEPA and tier off this EIS?

TVA Response:

All future environmental review of actions on the planned mountain reservoir lands will be performed in accordance with the requirements of the National Environmental Policy Act and tier from this FEIS. The type of environmental review will depend on the nature of the action, as will the decision on how to involve the public in the review.

EPA-18. Only reasonable requests for water-dependent or water-related uses and for expansions of existing recreation facilities (vs. greenfield) should be considered.

TVA Response:

Comment noted. Please refer to the response to Comment EPA-7.

EPA-19. Requests for industrial use should be limited to barge terminals having low potential for water quality impacts.

TVA Response:

Because of the limits to commercial navigation on the mountain reservoirs, TVA does not anticipate any requests for barge terminals on these reservoirs. Table 2-1 describes the types of industrial uses that would be considered by TVA on a

parcel allocated to Zone 5. In accordance with TVA's Land Policy (see FEIS Appendix A), TVA gives preference to industrial development that requires water access. TVA would evaluate the potential for water quality impacts in its individualized review of any industrial development proposals. Under TVA's preferred alternative (Alternative D), no land on the mountain reservoirs would be allocated for industrial development.

EPA-20. Non-water dependent industrial facilities should be sited away from shorelines.

TVA Response:

Comment noted. In accordance with TVA's Land Policy (see FEIS Appendix A), TVA gives preference to industrial development that requires water access. TVA has limited ability to control the siting of industrial facilities on lands it does not own.

EPA-21. If NEPA does not apply, TVA should do an environmental review of the proposal.

TVA Response:

Environmental reviews of specific proposals for the use of TVA lands, Section 26a approvals, and other qualified federal actions would be conducted in accordance with the requirements of the National Environmental Policy Act.

EPA-22. The allocation of Parcel 10 to industrial use could set a precedent.

TVA Response:

In the Mountain Reservoirs Land Management Plan EIS, Parcel 10 on Chatuge Reservoir would be zoned for industrial use under Alternative C. Parcel 10 is the only parcel considered for this allocation. Under the Blended Alternative, which is the preferred alternative, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation). In addition, the use for Parcel 10 for industrial purposes would be in accordance with TVA's current zone allocation definitions (see Table 2-1) and TVA's Land Policy. Thus, the possible allocation of Parcel 10 for industrial use is not likely to set a precedent.

EPA-23. The proposed use of Parcel 10 is not clarified in the DEIS such that the potential for water quality effects can be evaluated (lack of circulation in the embayment)

TVA Response:

The potential water quality impacts resulting from industrial use of Parcel 10 under Alternative C are described in FEIS Section 3.2.10.2. Further, if and when TVA receives an application requesting permission for a specific use of Parcel 10, TVA will conduct an individualized evaluation of that request, which would contain a more detailed project description and evaluation of project impacts.

EPA-24. It is unclear if remaining undeveloped residential plots would be developed in accordance with the SMP or if they would be "grandfathered."

TVA Response:

If requests for private water use facilities or other improvements are submitted on previously undeveloped TVA lands allocated to Zone 7 (Shoreline Access), those requests will be subject to TVA's then-current rules, policies, and procedures, including TVA's Shoreline Management Policy, Land Policy, and Section 26a regulations.

EPA-25. Any proposed re-zonings for Chatuge Reservoir should be designed to improve water quality rather than only maintain it.

TVA Response:

Comment noted. Water quality is an important resource on Chatuge and all TVA reservoirs. TVA has participated in several water quality improvement projects over the last few years.

EPA-26. Recreational shoreline developments should be water-dependent or water-related, and should be expansions of existing facilities rather than greenfields.

TVA Response:

Comment noted. Please see the response to comment EPA-7.

EPA-27. EPA is concerned about development of Parcel 77 (perhaps not needed; not water-dependent)

TVA Response:

Comment noted. Under TVA's preferred alternative (Alternative D), Parcel 77 would be allocated to Zone 4 - Natural Resource Conservation.

EPA-28. Parcels 34 and 52 appear to be greenfield sites.

TVA Response:

Both Hiwassee Parcel 34 and Chatuge Parcel 52 are greenfield sites. Parcel 34 is an early successional bottomland area habitat located immediately upstream of Murphy, North Carolina, and was previously an agricultural field. Parcel 52 is primarily open land with trees along the shoreline.

EPA-29. The use of Alternatives B and C presents the decisionmaker with an all-or-none situation. Consider an additional alternative that reduces impacts but increases recreational benefits.

TVA Response:

In response to public comments and changes in earlier requests for reallocations of a few individual parcels, TVA has developed and evaluated Alternative D, the Blended Alternative. Under this alternative, Parcels 10 and 77 on Chatuge Reservoir and Parcel 34 on Hiwassee Reservoir would be allocated to Zone 4 (Natural Resource Conservation). Also under this alternative, Parcel 52 on Chatuge and Parcel 49 on Hiwassee would be allocated for developed recreation (Zone 6). These allocation changes would reduce the potential for adverse environmental effects.

EPA-30. The FEIS should clarify BRMEMC's proposal on Parcel 10 and the potential impacts. This should address overall need, need for shoreline access, effluents, induced development, and cumulative effects.

TVA Response:

BRMEMC has withdrawn its request that TVA allocate Parcel 10 on Chatuge for industrial use. BRMEMC had expressed an interest in establishing access for a water intake to serve the nearby industrial park. This information is provided in Section 3.2.1.2 of the FEIS. Notwithstanding the withdrawal of the request, the foreseeable impacts of industrial development of Parcel 10, including impacts to the old-growth forest, are described in FEIS Sections 3.1.3 and 3.2.3. Further, if and when TVA receives an application requesting permission for a specific use of Parcel 10, TVA will conduct an individualized evaluation of that request, which would contain a detailed project description and evaluation of project impacts.

EPA-31. We rate the EIS as EC-2.

TVA Response:

Comment noted.

EPA-Detailed Comments:

EPA-D1. FEIS should indicate the presence/absence of pocosin wetlands.

TVA Response:

As stated in FEIS Section 3.1.5.1, no pocosin wetlands were found during field surveys.

EPA-D2. Would additional environmental review of proposed projects (e.g., Parcel 10) include anything other than air effects?

TVA Response:

Additional environmental reviews would consider potential effects to air quality as well as any other potentially affected environmental resources.

EPA-D3. EPA appreciates reference to climate change Old growth on Parcel 10 may sequester carbon.

TVA Response:

Comment noted.

EPA-D4. FEIS should discuss any reasonably foreseeable future actions (federal or private) that could cause cumulative impacts.

TVA Response:

Cumulative effects of reasonably foreseeable future actions are described in Section 3.9 of the FEIS.

EPA-D5. Double counting of sufferance agreement acreages in Table 3-3?

TVA Response:

Table 3-3 has been corrected in the FEIS. Sufferance agreements should have been listed only once.

EPA-D6. Public said they wanted more hiking trails. DEIS is unclear if additional trails (other than Hiwassee parcel 49) would be created under the alternatives.

TVA Response:

The only additional trail associated with a proposed change in land use is on Parcel 49 on Hiwassee Reservoir. The construction of trails is an allowable use of lands in Zones 2, 3, 4, and 6, and thus could occur on numerous other parcels.

EPA-D7. Wetlands row in Table 2-10 under Alternative C says “no wetlands,” but pages 10 and 130 say that “a narrow fringe riparian emergent wetland” is present on Parcel 34

TVA Response:

Table 2-12 (Table 2-10 in the DEIS) has been amended in the FEIS to reflect potential effects to wetlands. There are no shoreline wetlands on Parcel 34, but there are some fringe shoreline wetlands on the adjacent Parcel 40.

EPA-D8. Table 2-10 should indicate effects to federal and state T&E species. Table 2-10 says “no adverse effects” on listed T&E, but page 59 says actions on Parcel 10 could affect eagles and Indiana bat habitat.

TVA Response:

This table has been amended in the FEIS to reflect potential effects to threatened and endangered species. The effects on state-listed species are described in more detail in Section 3.2.4 of the FEIS. As stated in Section 3.2.4, Parcel 10 provides suitable roosting habitat for eagles. Although eagles frequently roost on Parcel 10, they do not nest there. Likewise, suitable Indiana bat habitat exists on Parcel 10, but this species has not been documented onsite. Thus, potential effects to terrestrial animals are not expected to be adverse. Under any of the alternatives, TVA would conduct an environmental review of any proposed use of TVA-managed lands on the mountain reservoirs. As necessary, TVA would undertake additional consultation with the U.S. Fish and Wildlife Service at that time.

U.S. Fish and Wildlife Service (USFWS)



United States Department of the Interior

FISH AND WILDLIFE SERVICE
446 Neal Street
Cookeville, TN 38501

August 28, 2008

Memorandum

To: Regional Director, FWS, Atlanta, GA
From: Field Supervisor, ES, FWS, Cookeville, TN
Subject: DEIS for TVA's Mountain Reservoirs Land Management Plan (ER# 08/0851)

Biologists from the Cookeville Field Office staff have reviewed the subject document and we offer the following comments.

The draft environmental impact statement contains thorough descriptions of the reservoirs involved in the study and the fish and wildlife resources present in and around each reservoir. An evaluation of the three alternatives under consideration is also provided.

FWS-1 — The "no action" alternative (Alternative A) would not have adverse effects on any federally listed or proposed endangered or threatened species in our work area (i.e., Polk County, Tennessee). We would, therefore, have no objection to selection of this alternative as the preferred alternative.

FWS-2 — Alternative B would designate lands around each reservoir in one of seven land use categories used by the Tennessee Valley Authority. If this alternative is selected, we recommend that tailwater reaches below Apalachia Dam and below Ocoee #2 and Ocoee #3 be designated for sensitive resource management because of the presence of the endangered Ruth's golden aster, tan riffleshell, and Cumberland bean pearlymussel.

FWS-3 — Alternative C would designate parcels for developed recreation and industrial purposes. All of the parcels proposed for such designation are located on Chatuge and Hiwassee lakes in Georgia and North Carolina. Those parcels are not within our work area, and designation for development would likely not have adverse effects on listed species in Tennessee.

FWS-1.

TVA Response:

Comment noted.

FWS-2.

TVA Response:

The amount of TVA managed public land next to the tailwaters of the Ocoee and Apalachia dams is small and is dedicated primarily to project operations (Zone 2). However, most of the land next to the tailwaters of these dams is public and managed by the U.S. Forest Service (USFS). Wherever possible, TVA cooperates with the USFS to reduce impacts to sensitive species. Examples include actions such as limiting access to areas containing sensitive resources.

FWS-3.

TVA Response:

Comment noted.

USFWS Atlanta



United States Department of the Interior

OFFICE OF THE SECRETARY
 Office of Environmental Policy and Compliance
 Richard B. Russell Federal Building
 75 Spring Street, S.W.
 Atlanta, Georgia 30303



ER 08/0851
 9043.1

September 29, 2008

Daniel H Ferry
 Tennessee Valley Authority
 Environmental Services
 400 W. Summit Hill Drive, WT 11D
 Knoxville, Tennessee 37902

Subject: Draft Environmental Impact Statement (DEIS) for the Mountain Reservoirs Land Management Plan, TN, NC, and GA (

Dear Mr. Loney:

The Department of the Interior (Department) has reviewed the Tennessee Valley Authority's (TVA) August 6, 2008, draft Environmental Impact Statement (DEIS) for the Mountain Reservoirs Land Management Plan (MRLMP). The Fish and Wildlife Service (Service) met with TVA staff at your offices in Knoxville on August 25, 2008. The Department provides the following comments for the conservation and protection of fish and wildlife trust resources. The omments and recommendations are submitted in accordance with the provisions of the Endangered Species Act of 1973, as amended (16 U.S.C. §§1531-1543); the Migratory Bird Treaty Act (16 U.S.C. §§1536, 1538); the National Environmental Policy Act (42 U.S.C. § 4321 et seq.); and the Clean Water Act (33 U.S.C. §1251 et seq.).

In general we found the DEIS for the Mountain Reservoirs Land Management Plan (MRLMP) well-written and thorough.

Scope of Environmental Document. We believe the proposed action is a significant undertaking for which preparation of an Environmental Impact Statement (EIS) is appropriate. We are pleased that you have prepared such an environmental document for the MRLMP. This document will be an appropriate vehicle to consider the best balance of the power, navigation, flood control and environmental uses of the TVA lands. Previously, we commented that the geographic scope of the environmental document should include not only the parcel boundaries, but also the area of effect of the TVA operations, including the extent of peaking effects in the tailwaters, the bypassed reaches, and any area of project-induced effects, including those on

FWSa-1

USFWS Atlanta (continued)

national forest, national park, and private lands. However, the MRLMP only considers management alternatives for the land uses for the next 10 years – we agree with this scope, so long as operational and other effects are considered whenever proposed.

Alternatives. We agree that this comprehensive land management plan is necessary for TVA to adequately plan its land management, especially for those parcels previously unclassified or unmanaged. Therefore, we do not consider adoption of the No Action Alternative appropriate for a federal agency with this sort of legacy responsibility. The DEIS should consider the least environmentally damaging alternative as its preferred alternative in the DEIS. Therefore, the Proposed Land Use Plan Alternative B is the least environmentally damaging and most appropriate for adoption.

FWSa-2

FWSa-3

We provide the following specific comments in some important resource areas that you should consider in the final EIS. We are quite concerned about some of the specific land management alternatives proposed by the public under Alternative C that would allow for changes in the land uses and land cover of some natural vegetated and sensitive parcels:

Chatuge Reservoir, Parcel 10. This parcel is currently forested and should be retained in natural resource conservation use, rather than considered for potential industrial development under allocation to Zone 5. Changes in land use and land cover would have unacceptable adverse effects on important wildlife habitat, riparian cover, and the large mature hardwood forest habitat. We oppose this proposed change in parcel zone under Alternative C.

FWSa-4

Chatuge Reservoir, Parcel 52. This parcel is mostly open, it does have important forested riparian area that should remain undisturbed in natural resource conservation classification (Zone 4), rather than considered for potential industrial development under allocation to Zone 6. Changes in land use and land cover would have unacceptable adverse effects on important wildlife habitat riparian cover, and the large mature hardwood forest habitat. We oppose this proposed change in parcel zone under Alternative C.

FWSa-5

Chatuge Reservoir, Parcel 77. This parcel is currently forested and should be retained in natural resource conservation classification (Zone 4), rather than considered for potential industrial development under allocation to Zone 6. Changes in land use and land cover would have unacceptable adverse effects on important wildlife habitat riparian cover, and areas of mature hardwood forest habitat. We oppose this proposed change in parcel zone under Alternative C.

FWSa-6

Hiwassee Reservoir, Parcel 34 and Parcel 40. These 2 small parcels have important forested riparian area that should remain undisturbed in natural resource conservation, rather than considered for use as public access point under allocation to Zone 6. Nearby public access points offer adequate boat launching opportunities. The adjacent Hiwassee River fluctuation zone is important mussel beds and habitat for the Sicklefin redhorse, a candidate for listing under the Endangered Species Act. We oppose this proposed change in parcel zone under Alternative C.

FWSa-7

USFWS Atlanta (continued)

FWSa-8 — Hiwassee Reservoir, Parcel 49. This small, linear parcel does not have significant resource values and could be used for low impact public access trail, with adequate erosion control and minimal ground disturbance. This parcel would be considered for use as public trail development under allocation to Zone 6. We do not oppose this proposed change in parcel zone under Alternative C.

FWSa-9 — In general, we recommend TVA reconsider its use of Zone 7 under Alternatives A, B, or C at all but extremely isolated or already developed shorelines parcels on Blue Ridge, Chatuge, Hiwassee, Fontana and Nottely Reservoirs lands. Appalachia and Ocoee Reservoir lands do not include this zoning since adjacent shoreline residential uses do not occur. We believe it is time (10 years has already passed since the SMI) for a fresh look at the capacity and overall incremental changes in shoreline fragmentation under this Zone. We encourage TVA to re-balance its consideration of public values for undeveloped shoreline, current and future, with those of individual adjacent private landowners, or developers, in a manner that retains open space and fish and wildlife habitats.

FWSa-10 —

Endangered Species. The Service appreciates your detailed analysis of the potential effects of each Alternative on endangered species and critical habitats within the area of effect of the proposed action(s) and how each alternative consider the requirements of Section 7(a)(1) and 7(a)(2) of the Endangered Species Act. These parts of Section 7 of the ESA include the requirement to evaluate the potential for jeopardy, as well as the mandate that federal agencies further the conservation of the each federally listed species. The Service anticipates a more detailed biological assessment as part of any proposed changed land use following adoption of the MRLMP.

FWSa-11 — Based on the information provided, the Service agrees that adoption of this programmatic MRLMP would not likely have any adverse effect on listed species. The Service anticipates that any change in land use or other action that could affect endangered species would be considered as individual proposals for such action are proposed under the new MRLMP. In view of this, the requirements under section 7(c) of the Act have been fulfilled. However, obligations under section 7 of the Act must be reconsidered if: (1) new information reveals impacts of this identified action that may affect endangered or threatened species or critical habitat in a manner not previously considered, (2) this action is subsequently modified in a manner not considered in this review, or (3) a new species is listed or critical habitat is determined that may be affected by the action.

FWSa-12 — Migratory Birds. The Service is concerned about the potential for impacts to migratory birds by management of the mountain reservoir lands and suggests you adopt the alternative with least adverse effects. The main concern here is that “uncommitted” parcels could be converted to other land uses, and result in adverse impacts to habitats used by migrating shorebirds, especially foraging habitat areas of wading birds. The Service recommends you consider the potential effects if the zoning will significantly altered habitat or activities in a manner that could impact migratory bird habitat. Changes in the current land management could change, reduce or potentially eliminate this habitat for migrating shorebirds and resident and migrant waders for foraging and roosting/resting.

USFWS Atlanta (continued)

Page 4

Summary. With increasing development in the Tennessee Valley, the importance of protecting managed areas and ecologically significant sites will increase. Thank you for allowing us to provide these comments, and we hope you adopt appropriately sensitive land management plan for the lands entrusted to TVA. If you have any questions or need assistance, please do not hesitate to contact Mark Cantrell with the Fish and Wildlife Service at (828) 258-3939, Ext. 227. I can be reached on (404) 331-4524 or email at gregory_hogue@ios.doi.gov.

Sincerely,



Gregory Hogue
Regional Environmental Officer

cc:

FWS Asheville Field Office – Mark Cantrell
FWS Athens Field Office - Dr. Robin Goodloe
FWS Cookeville Field Office - Jim Widlak
OEPC WASH

FWSa-1. The scope should include the area of effect of TVA operations, including the extent of peaking effects in the tailwaters, the bypassed reaches, and any area of project-induced effects, including those on national forest, national park, and private lands.

TVA Response:

The effects of TVA's operation of the reservoirs, including flows in tailwaters, were assessed in TVA's 2004 Reservoir Operations Study. The proposed land plan would not change TVA's operation of the reservoirs. Land use patterns along the shoreline and back-lying land are an important part of the analysis for Land Use (Section 3.1.1), Recreation (Section 3.1.2), Managed Areas (3.1.8), and Socioeconomics (3.1.12). These environmental issues as well as any other identified would be part of the environmental review of the impacts of future projects.

FWSa-2. Adoption of the No Action Alternative is not appropriate for a federal agency with this sort of legacy responsibility.

TVA Response:

Comment noted. Consideration of the No Action Alternative is consistent with CEQ NEPA regulations, 40 CFR § 1502.14(d).

FWSa-3. Alternative B should be the preferred alternative.

TVA Response:

Comment noted.

FWSa-4. Oppose changing Parcel 10 to industrial use, as it would cause loss of forest cover and wildlife habitat.

TVA Response:

Comment noted. Loss of forest habitat as a result of clearing for industrial use of Parcel 10 for industrial use under Alternative C is described in Section 3.2.3.1.2 of the FEIS.

FWSa-5. Keep Parcel 52 in Zone 4; do not change to industrial under Zone 6. This would have unacceptable effects on wildlife habitat, riparian cover, and large mature hardwood forest habitat.

TVA Response:

In a separate action evaluated in the environmental assessment “Blue Ridge Mountain Electric Membership Corporation Proposed Substation,” TVA would make 1.4 acres of Parcel 52 available at public auction for use as a substation. Under Alternative D, the preferred alternative, the 6.1-acre Parcel 52 would be allocated to Zone 6 for developed recreation use, and the 1.9-acre Parcel 52a would be allocated to Zone 4 for natural resource conservation. The effects of a Zone 6 allocation on Parcel 52 are discussed in Section 3.2.3 of the FEIS.

FWSa-6. Keep Parcel 77 in Zone 4; do not change to industrial under Zone 6. This would cause losses of riparian cover and areas of mature hardwoods.

TVA Response:

Under Alternative C, Parcel 77 would be allocated to Zone 6 (Developed Recreation). Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation) under Alternative B and the Alternative D (the preferred alternative). None of the alternatives involve allocating Parcel 77 for industrial use.

FWSa-7. Parcels 34 and 40 have important riparian areas and should remain undisturbed; do not allocate to Zone 6. Nearby access points offer adequate launching opportunities. Sicklefin redhorse inhabits the adjacent Hiwassee River.

TVA Response:

Under the preferred alternative (Alternative D), Parcel 34 would be allocated to Zone 4 (Natural Resource Conservation), which is consistent with its current land use. Under Alternatives B, C, and D, Parcel 40 would be allocated to Zone 3 (Sensitive Resource Management). Under Alternative A, Parcel 40 is allocated to Zone 4.

FWSa-8. USFWS does not oppose use of Parcel 49 for Zone 6.

TVA Response:

Comment noted.

FWSa-9. TVA should reconsider its use of Zone 7 under Alternatives A, B or C at all but extremely isolated or already developed shoreline parcels on Blue Ridge, Chatuge, Hiwassee, Fontana, and Nottely Reservoir lands.

TVA Response:

Land planning and land use allocation does not supersede deeded landrights. Most of the land allocated to Zone 7 (shoreline access) in current or potential residential development along the reservoirs is on land TVA sold with residential access rights across the retained land below the MSC or on private land with similar rights.

FWSa-10. TVA should take a fresh look at the capacity and overall incremental changes in shoreline fragmentation under Zone 7. Rebalance consideration of public values for undeveloped shoreline with those of adjacent private landowners or developers to maintain open space and fish and wildlife habitats.

TVA Response:

Fragmentation of terrestrial habitats is becoming a more important issue as various types of land developments increase, especially in areas with little public land. However, ownership rights must be considered (see the response to comment FWSa-9). In addition, wherever appropriate, TVA provides undeveloped shoreline by allocation to Zones 3 (Sensitive Resource Management) or 4 (Natural Resource Conservation).

FWSa-11. Adoption of the programmatic MRLMP would not likely have any adverse effect on listed species.

TVA Response:

Comment noted.

FWSa-12. TVA should adopt the alternative that has the least adverse effects on migratory birds. Uncommitted parcels could be converted to other land uses, degrading habitat for migrating shorebirds/wading birds.

TVA Response:

Comment noted. Although adoption of Alternative B would result in the least adverse effects on migratory birds, TVA's preferred alternative, as explained in FEIS Section 2.5, is Alternative D.

USFS



United States
Department of
Agriculture

Forest
Service

National Forests in North Carolina
Supervisor's Office

160 ZILICOA ST STE A
ASHEVILLE NC 28801-1082
828-257-4200

File Code: 1910
Date: September 25, 2008

Daniel H. Ferry
Environmental Services and Programs
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902

Doc. Type: _____

Index Field: _____

Project Name: _____

Project No.: _____

Dear Mr. Ferry:

Thank you for providing the US Forest Service an opportunity to comment on your Draft Environmental Impact Statement for managing TVA's mountain reservoirs. Three of these reservoirs border National Forest lands in North Carolina (Fontana, Chatuge and Hiwassee), so TVA management decisions for these reservoirs directly impacts forest facilities and resources. We have no concerns about the overall management direction laid out in the document. We do, however, have a few suggested modifications in the proposed zoning for reservoir areas adjacent to forest developed recreation sites (these proposed modifications are also identified on the attached maps):

For Hiwassee Reservoir:

FS-1

Grape Creek Recreation Residence Area - Add TVA lands adjacent to this area to Zone 6 (Developed Recreation Areas as noted on Hiwassee Reservoir Map B-3). This area contains eight Recreation Residences who maintain small cabins, boardwalks and piers on National Forest System Lands under a Special Use permit. Both the permit holders and the general public have lake access from this area for recreational activities.

FS-2

Hanging Dog Campground - Add TVA lands adjacent to this area to Zone 6 (Developed Recreation Areas as noted on Hiwassee Reservoir Map B-3). Hanging Dog Campground provides developed fee campsites for both trailers and tents. Restroom facilities, water, picnic and swimming areas are available within the campground. The area also has primitive campsites dispersed along the shoreline in several areas around this reservoir, but these sites provide no facilities so we recommended you leave these areas in the identified status. Hanging Dog Campground area has two boating access areas. These access areas currently charge no fees for use.

For Chatuge Reservoir:

FS-3

Jack Rabbit Campground - Expand Zone 6 (Developed Recreation Areas as noted on Chatuge Reservoir Map A-2, Parcel Number 85). Facilities provided include fee campsites with fire rings, picnic tables, lantern posts, gravel tent pads (in some sites) and hot showers. Other amenities of the area include a paved boat ramp with floating dock, picnic shelters, amphitheatre, a picnic area and swimming beach with bath house. Expanding this Zone would be compatible with current and future Forest Service management activities.



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USFS (continued)

Tennessee Valley Authority

2

For Fontana Reservoir:

FS-4

Tsali Recreation Area – Expand Zone 6 (Developed Recreation Areas from the Tsali Canoe Launch, Parcel Number 6 northward to Parcel No 13, Crisp Boat Dock Harbor Limits). This area includes a fee campground of 42 campsites with showers and flush toilets, dispersed camping at designated sites, a boat launch, and 42 miles of trails designed for mountain biking, horseback riding and hiking. Expanding TVA’s proposed Developed Recreation Area to include Parcels 14 and 17 as a Developed Recreation Area would be compatible with current Forest Service management activities.

These slight modifications would bring your management plan better in line with current adjacent uses for these areas. If you have additional questions, please contact Ray Johns at our Asheville Office (828-257-4857, rayjohns@fs.fed.us).

Sincerely,

/s/ Marisue Hilliard
 MARISUE HILLIARD
 Forest Supervisor

FS-1. Make lands adjacent to Grape Creek Recreation Residence Area (Hiwassee Reservoir) Zone 6.

TVA Response:

The shoreline adjacent to the Grape Creek Recreation Residence Area, which is now identified as Parcel 70, has been allocated to Zone 6.

FS-2. Allocate the shoreline adjacent to Hanging Dog Campground on Hiwassee Reservoir to Zone 6 under all the alternatives.

TVA Response:

TVA manages virtually no shoreline adjacent to the Hanging Dog Campground and Recreation Area within the area requested for allocation to Zone 6. The shoreline between Parcel 66 and Parcel 67 will not be allocated.

FS-3. Expand the Zone 6 allocation on Parcel 85 around the Jack Rabbit Campground on Chatuge Reservoir.

TVA Response:

The backlying USFS property adjacent to that portion of Parcel 84 requested for allocation to Zone 6 is currently used for informal and dispersed recreation. Thus, TVA prefers to allocate Parcel 84 to Zone 4.

FS-4. Allocate Parcel 14 on Fontana Reservoir to Zone 6. This parcel forms the shoreline of the Tsali Recreation Area.

TVA Response:

TVA prefers to allocate Fontana Parcel 14 (which fronts the Tsali Recreation Area) to Zone 4. A Zone 4 allocation is consistent with current recreational uses, which do not require additional water access. The Tsali Canoe Launch and the Lemons Branch Boat Ramp are nearby. The agreements transferring properties from TVA to USFS control already allow for the management of adjoining TVA-retained lands below the MSC by USFS.

TWRA



TENNESSEE WILDLIFE RESOURCES AGENCY

ELLINGTON AGRICULTURAL CENTER
P. O. BOX 40747
NASHVILLE, TENNESSEE 37204

September 16, 2008

Doc. Type: _____

Index Field: _____

Project Name: _____

Project No.: _____

Daniel H. Ferry
Environmental Services and Programs
Environmental Stewardship and Policy
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902-1401

Re: Draft Environmental Impact Statement (DEIS) – Mountain Reservoirs Land Management Plan (MRLMP), Fannin, Towns and Union Counties, Georgia; Cherokee, Clay, Graham, and Swain Counties, North Carolina; and Polk County, Tennessee

Dear Mr. Ferry:

The Tennessee Wildlife Resources Agency received the Draft Environmental Impact Statement (DEIS) – Mountain Reservoirs Land Management Plan (MRLMP), Fannin, Towns and Union Counties, Georgia; Cherokee, Clay, Graham, and Swain Counties, North Carolina; and Polk County, Tennessee.

Although land use changes for Ocoee #1, #2, and #3, the only reservoirs in Tennessee, would not occur with either alternative; the Tennessee Wildlife Resources Agency prefers Alternative B. In general, Alternative C would allocate existing land from dispersed recreational use, which is used for activities such as hunting, to developed recreational use. Alternative C would have greater impacts to plant, especially old growth forest, and wildlife communities. Impact to floodplains under Alternatives A and C would be greater than Alternative B. During the public scoping process, the public responded that they believe that the mountain reservoirs have “about the right amount” of developed land uses such as recreation day use areas; marinas, and developed campgrounds. The public also responded that too much land is available for industry/light manufacturing and that more land is needed for undeveloped land uses. Alternative B would support the public’s desires.

We thank you for the opportunity to comment on the Draft Environmental Impact Statement.

Sincerely,

Robert M. Todd
Fish and Wildlife Environmentalist

The State of Tennessee

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TVA Response:

TWRA’s preference for Alternative B is noted.

Tennessee Department of Transportation



RECEIVED AUG 26 2008 STATE OF TENNESSEE DEPARTMENT OF TRANSPORTATION SUITE 700, JAMES K. POLK BUILDING NASHVILLE, TENNESSEE 37243-0349 (615) 741-2848

GERALD F. NICELY COMMISSIONER

PHIL BREDESEN GOVERNOR

August 21, 2008

Mr. Daniel H. Ferry Senior Manager Environmental Services and Programs Environmental Stewardship and Policy Tennessee Valley Authority 400 West Summit Hill Drive Knoxville, TN 37902-1401

Doc. Type: _____ Index Field: _____ Project Name: _____ Project No.: _____

RE: Draft Environmental Impact Statement (DEIS) – Mountain Reservoirs Land Management Plan (MRLMP), Fannin, Towns and Union Counties, Georgia; Cherokee, Clay, Graham, and Swain Counties, North Carolina; and Polk County, Tennessee

Dear Mr. Ferry:

Thank you for the opportunity to review the above-referenced document.

After reviewing this DEIS, we have concluded that it will not impact any program or highway project in Tennessee.

Should you have any questions, please contact Mr. Tom Love, Transportation Manager, at 615-741-5364.

Sincerely,

Gerald F. Nicely Commissioner

GFN/TL/jrk

Cc: Mr. Tom Love, W/Attach.

TVA Response: Comment noted.

Tennessee Historical Commission



RECEIVED AUG 26 2008

TENNESSEE HISTORICAL COMMISSION
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
2941 LEBANON ROAD
NASHVILLE, TN 37243-0442
(615) 532-1550

August 15, 2008

Doc. Type: _____

Index Field: _____

Project Name: _____

Project No.: _____

Mr. Daniel H. Ferry
Tennessee Valley Authority
400 West Summit Hill Dr.
Knoxville, Tennessee, 37902-1499

RE: TVA, MOUNTAIN RESERVOIRS LMP, UNINCORPORATED, POLK COUNTY

Dear Mr. Ferry:

In response to your request, received on Friday, August 8, 2008, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicant for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800. You may wish to familiarize yourself with these procedures (Federal Register, December 12, 2000, pages 77698-77739) if you are unsure about the Section 106 process.

Considering available information, we find that the project as currently proposed MAY ADVERSELY AFFECT PROPERTIES THAT ARE ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES. You should now begin immediate consultation with our office. Please direct questions and comments to Joe Garrison (615) 532-1550-103. We appreciate your cooperation.

Sincerely,

[Handwritten signature of E. Patrick McIntyre, Jr.]

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/jyg

TVA Response:

Comment noted. See Section 2.6, Summary of TVA Commitments and Proposed Mitigation Measures, and Section 3.1.7, Cultural Resources. TVA has executed a programmatic agreement (PA) with the Tennessee State Historic Preservation Officer (SHPO) for reservoir land plans and would execute similar separate PAs with Georgia and North Carolina SHPOs for the identification, evaluation, and treatment of all affected cultural resources. All activities would be conducted with the stipulations defined in these PAs, which provide for the identification, evaluation and treatment of cultural resources. Until the PAs are

AGENCY COMMENTS

executed in states without them, TVA will incorporate the phased identification, evaluation, and treatment procedure to effectively preserve historic properties as required by Section 106 of the NHPA.

|

North Carolina Department of Cultural Resources



North Carolina Department of Cultural Resources
State Historic Preservation Office
Peter B. Sandbeck, Administrator

Beverly Eaves Perdue, Governor
Linda A. Carlisle, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

March 26, 2009

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

Re: Draft Environmental Impact Statement – Mountain Reservoirs Land Management Plan, Fannin, Towns and Union Counties, Georgia, Cherokee, Clay, Graham, and Swain Counties, North Carolina, and Polk County, Tennessee, ER 07-1248

Dear Mr Maher:

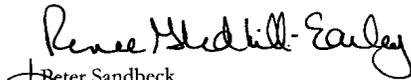
Thank you for your letter of August 6, 2008, concerning the above project. We apologize for the delay in our response.

We have conducted a review of the project and are aware of no historic resources which would be affected by the project. Therefore, we have no comment on the project as proposed.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579. In all future communication concerning this project, please cite the above-referenced tracking number.

Sincerely,


Peter Sandbeck

Location: 109 East Jones Street, Raleigh NC 27601

Mailing Address: 4617 Mail Service Center, Raleigh NC 27699-4617

Telephone/Fax: (919) 807-6570/807-6599

TVA Response:
Comment noted.

Georgia Department of Natural Resources

Noel Holcomb, Commissioner
Dan Forster, Director

Georgia Department of Natural Resources
Wildlife Resources Division

Nongame Conservation Section

2065 U.S. Highway 278, S.E., Social Circle, Georgia 30025-4743

(770) 918 6411

RECEIVED AUG 26 2008

August 19, 2008

Daniel H. Ferry, Senior Manager
Environmental Services and Programs
Environmental Stewardship and Policy
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902-1401

Doc. Type: _____

Index Field: _____

Project Name: _____

Project No.: _____

Re: Draft Environmental Impact Statement (DEIS) – Mountain Reservoirs Land Management Plan (MRLMP), Fannin, Towns and Union Counties, GA

Dear Mr. Ferry:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) – Mountain Reservoirs Land Management Plan (MRLMP). We agree with the previous statements presented by the Georgia Department of Natural Resources (GA DNR) representatives at the public meetings. We feel it is important to improve public access, provide protection of riparian zones and we prefer that in general, lands remain zoned as Natural Resources Conservation Areas.

GaDNR-1

Though we support the increased recreational opportunities provided by Alternative C, we do not agree with some of the proposed actions on the Chatuge Reservoir. We feel that the rezoning of Parcel 10 from Zone 4 to Zone 5 and allowing industrial development on the site would be detrimental to the natural resources in the area. Even small areas of mature forest can provide important habitat for species that rely on older growth trees. We also feel that whenever possible, it is beneficial to maintain forested buffers around reservoirs and provide open space for residents. Because portions of this reservoir are already developed for other use, retaining the remaining natural habitat surrounding the reservoir is critical to the protection of water quality and to provide wildlife habitat and recreational opportunities.

GaDNR-2

GaDNR-3

The proposed change of Parcel 77 from Zone 4 to Zone 6 may also be detrimental. GA DNR supports the effort to provide more recreational opportunities on Georgia's Reservoirs. However, the proposed action includes construction of a recreational facility that may include a major increase in the amount of impervious surface and nighttime lighting. This action would also result in a loss of forested buffer along the reservoir. Currently, this parcel supports low impact recreation such as hiking, fishing and primitive camping. We feel that the current use of the parcel is a more appropriate use of the area than the proposed high impact recreation facility.

GaDNR-4

Overall, the DEIS provides thorough information regarding current and future management decisions on the reservoirs in Georgia. We appreciate the opportunity to provide input on the Mountain Reservoirs Land Management Plan. Please let me know if I can be of further assistance.

Sincerely,



Katrina Morris
Environmental Review Coordinator

cc: Dan Forster, Director

GaDNR-1. Prefer lands remain in Zone 4.

TVA Response:

Comment noted.

GaDNR-2. Under Alternative C, rezoning of Parcel 10 would be detrimental to local natural resources.

TVA Response:

Comment noted. As described in FEIS Section 3.2.1.2 and the response to Comments EPA-12 and 13, the industrial allocation of Parcel 10 under Alternative C responds to a proposal to construct a water intake. As stated in FEIS Section 3.2.1.2, BRMEMC has withdrawn this request, and Parcel 10 is allocated to Zone 4 (Natural Resource Conservation) rather than Zone 5 (Industrial) in Alternative D, TVA's preferred alternative.

GaDNR-3. Maintain forested buffers around reservoirs and provide open space for residents. Protection of water quality and provision of wildlife habitat is important.

TVA Response:

Comment noted.

GaDNR-4. Change of Parcel 77 to Zone 6 would be detrimental - more impervious surface, nighttime lighting, loss of forested buffer along the shoreline. Current recreational opportunity is more appropriate than the proposed use.

TVA Response:

Comment noted. The impacts associated with the allocation of Parcel 77 to Zone 6 (Developed Recreation) are discussed in Section 3.2 of the FEIS. Under TVA's preferred alternative (Alternative D), Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).

North Carolina Department of Transportation



Doc. Type: _____

Index Field: _____

STATE OF NORTH CAROLINA Project Name: _____
DEPARTMENT OF TRANSPORTATION Project No.: _____

MICHAEL F. EASLEY
GOVERNOR

LYNDO TIPPETT
SECRETARY

September 24, 2008

Mr. Daniel H. Ferry, Senior Manager
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902-1404

Dear Mr. Ferry:

Thank you for the opportunity to review the Tennessee Valley Authority's Draft Environmental Impact Statement for the Mountain Reservoirs Land Management Plan.

While the report appears to provide a thorough evaluation regarding the possible implementation of a land use plan for TVA, it does not explain how the changes may affect the North Carolina Department of Transportation's ability to implement improvements to our transportation system. We will have concerns if the proposed action adversely affects the Department's ability to construct, maintain, or operate our roadway system. The Department also currently has several proposed projects in the Transportation Improvement Program within the proximity of the Fontana, Chatuge, and Hiwassee Reservoirs. Likewise, we will have concerns if the proposed action adversely affects our ability to secure a permit for the proposed construction of these projects.

NCDOT-1

NCDOT-2

Thank you for the opportunity to comment. We are requesting a meeting with you or your staff to further discuss this planning effort and how the proposed zoning changes may affect our ability to maintain, operate, and implement transportation improvements. Please contact me at 919-733-9425 to further discuss our request and to establish a meeting date.

Sincerely,

Deborah Barbour, PE
Director of Preconstruction

DMB

cc: Secretary Lyndo Tippet
W. F. Rosser, PE, State Highway Administrator
Joel Setzer, PE, Division Engineer

MAILING ADDRESS:
NC DEPARTMENT OF TRANSPORTATION
PRECONSTRUCTION SECTION
1541 MAR. SERVICE CENTER
RALEIGH NC 27689-1541

TELEPHONE: 919-733-9425
FAX: 919-733-9428

WEBSITE: WWW.DOH.DOT.STATE.NC.US

LOCATION:
TRANSPORTATION BUILDING
1 SOUTH WILMINGTON STREET
RALEIGH NC

AGENCY COMMENTS

NCDOT-1.

TVA Response:

The FEIS has been updated to address the NCDOT concern that proposed allocation changes could affect the department's ability to improve the local transportation systems.

NCDOT-2.

TVA Response:

The TVA Watershed Team in Murphy, North Carolina, has been notified of NCDOT's request for a meeting.

North Carolina Department of Environment and Natural Resources



North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

MEMORANDUM

Date: 24 September 2008

To: Melba McGee, Environmental Coordinator
Department of Environment and Natural Resources

From: Angie Rodgers, Freshwater Ecologist *Angie Rodgers*
North Carolina Natural Heritage Program (NCHHP)

Subject: Project Number: 09-0039; Comments on Draft Environmental Impact Statement (DEIS) – Mountain Reservoirs Land Management Plan (MRLMP), Fannin, Towns and Union Counties, Georgia; Cherokee, Clay, Graham, and Swain Counties, North Carolina; and Polk County, Tennessee.



The Tennessee Valley Authority (TVA) is proposing to develop land management plans for nine mountain reservoirs, including Hiwassee, Fontana, Chatuge, Appalachia, Ocoee 1, 2, and 3, Blue Ridge, and Nottely Reservoirs. The Mountain Reservoirs Land Management Plan (MRLMP) will guide TVA's decisions for the next 10 years in areas such as water facility use permits, land use approvals, and land management decisions. There are three proposed alternatives. Alternative A is the No Action Alternative which will continue using the Forecast System to manage 4,592 acres of land around these reservoirs. Under the Forecast System, there are 1,630 acres currently unplanned and therefore will continue to be managed according to existing land use agreements. Alternative B is the Proposed Land Use Plan Alternative and consists of allocating all TVA reservoir lands into one of seven different zones. Land use would not change from its current state; however it would be zoned to its current land use. There are 230 parcels previously unplanned that would reflect current land use with assigned zones. Alternative C is the Proposed Modified Land Use Plan Alternative. It is the same as Alternative B with the exception of 101 acres (3 parcels) on Chatuge Reservoir and 4.4 acres (2 parcels) on Hiwassee Reservoir. The lands at these two reservoirs would be designated for Developed Recreation or Industrial, which is different from their current land use.

We will provide comment on the proposed alternatives as they affect lands and resources within the State of North Carolina. Both Alternatives B and C provide land use planning via designated zones for

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North Carolina Department of Environment and Natural Resources (continued)

Page 2
 24 September 2008
 Project Number: ~~08-0039~~ 09-0039
 TVA DEIS MRLMP

NCDENR-1 all TVA lands. This type of planning is preferable to the current Forecast System which does not apply to 1,630 acres that are currently unplanned, including all lands on Fontana Reservoir. Alternatives B and C are identical except for the parcels on Chatuge and Hiwassee Reservoirs. The potentially affected parcels on Chatuge Reservoir for proposed changes in Alternative C occur in the Georgia portion of the reservoir and thereby NHP is not appropriately equipped to evaluate. The parcels on Hiwassee Reservoir, however, occur in North Carolina and we will evaluate and provide comment.

NCDENR-2 Parcel 34 (2.4 acres) is located along the Hiwassee River upstream of the confluence of the Valley River with the Hiwassee River. There are numerous records for freshwater mussels in that portion of the river. They include: Tennessee clubshell (*Pleurobema oviforme*, FSC/NC-E), mountain creekshell (*Villosa vanuxemensis*, NC-T), rainbow (*Villosa iris*, NC-SC), spike (*Elliptio dilatata*, NC-SC), wavy-rayed lampmussel (*Lampsilis fasciola*, NC-SC), and long-solid (*Fusconata subrotunda*, NC-SR). Additionally, there are records for the North Carolina threatened banded sculpin (*Cottus carolinae*) and hellbender (*Cryptobranchus alleganiensis*, FSC/NC-SC).

NCDENR-3 Parcel 49 (2.0 acres) is located near the confluence of the Valley River and the Hiwassee River. There are no survey data available adjacent to Parcel 49; however, there are records for rainbow (*Villosa iris*, NC-SC) and wavy-rayed lampmussel (*Lampsilis fasciola*, NC-SC) further upstream in the Valley River. Additionally, this area of the Hiwassee River and Reservoir and the Valley River is habitat for sicklefin redhorse (*Moxostoma* sp.), currently a candidate species for listing under the Endangered Species Act.

NCDENR-4 While there are several rare species occurring within the area of the proposed recreational facilities along the Hiwassee River, the impacts should be minor and relatively inconsequential. We recommend using strict erosion and sedimentation control measures during any construction of the recreational facilities. Additionally, the presence of recreational facilities provides an opportunity for public education regarding species occurring in the Hiwassee River. We encourage the development of signage or other forms of outreach material that can be used or distributed in conjunction with the public fishing access or walking trail.

NCDENR-5 In closing, NCNHP prefers Alternative B or C for this project. We would like to see all TVA lands within a planning regime, as opposed to continuing the current Forecast System as is proposed in Alternative A. We are not opposed to Alternative C which would provide recreational opportunities along the Hiwassee River in North Carolina.

Thank you for the opportunity to provide comments on this project. If you should have any questions, feel free to contact me at (828) 689-5783 or angelina.rodgers@ncmail.net.

NCDENR-1. Land use planning under Alternative B and C is preferable to the current Forecast System, which does not apply to 1,630 acres that are currently unplanned, including all lands on Fontana Reservoir.

TVA Response:

Comment noted.

NCDENR-2. There are T&E species near Parcel 34 (Tennessee clubshell, mountain creekshell, rainbow, spike, wavy-rayed lampmussel, long-solid, banded sculpin, and hellbender).

TVA Response:

Comment noted. A listing of listed species known to occur in and around Hiwassee Reservoir is provided as Table 3-25 in the FEIS, which has been amended to include these species.

NCDENR-3. There are T&E species near Parcel 49 (rainbow, wavy-rayed lampmussel, and sicklefin redhorse).

TVA Response:

Comment noted. Table 3-25 was updated in the FEIS to include the rainbow. Because proposed actions on Parcel 49 would not involve water access and because Parcel 49 is separated from the shoreline by Parcel 46 (see Figure 2-5), no effects to these aquatic species are expected under any of the action alternatives.

NCDENR-4. Use strict erosion control measures during construction of recreation facilities. Use signage to educate the public at fishing access points or on trails.

TVA Response:

Measures to prevent erosion and protect water quality, such as the implementation of best management practices and best construction practices, are typically included in land use agreements and/or Section 26a approvals. Informational signs are used on TVA-managed lands when appropriate.

NCDENR-5. Prefer Alternative B or C rather than the Forecast System. Not opposed to Alternative C; it would provide additional recreational facilities in North Carolina.

TVA Response:

Comment noted.

Georgia State Clearinghouse



OFFICE OF PLANNING AND BUDGET

Sonny Perdue
Governor

Trey Childress
Director

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Kenneth Parr
Mountain Reservoirs Land Mgt Plan
1101 Market Street, LP 5U-C
Chattanooga, TN 37402-3230

FROM: Barbara Jackson *BJ*
Georgia State Clearinghouse

DATE: 9/24/2008

SUBJECT: Executive Order 12372 Review

APPLICANT: Tennessee Valley Authority

PROJECT: DEIS: Mountain Reservoirs Land Management Plan (Chatuge, Hiwassee, Blue Ridge, Nottely, Ocoees 1, 2, and 3, Apalachia, and Fontana Reservoirs - GA, NC, TN)

STATE ID: GA080811008

The applicant/sponsor is advised that DNR's Environmental Protection Division was included in this review but did not comment within the review period. Should they submit comments within the next two weeks, we will forward to you.

The applicant/sponsor is advised to note additional comments from DNR's Historic Preservation Division.

/bj
Enc.: North Georgia RDC, Sep. 23, 2008
Georgia Mountains RDC, Aug. 19, 2008
DCA, Sep. 24, 2008
HPD, Aug. 26, 2008

*GA State Clearinghouse
270 Washington St SW
Atlanta GA 30334
8th Flr
Form NCC
January 2004*

Georgia State Clearinghouse (continued)

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: MS. JENNIFER WHORTON
NORTH GEORGIA RDC

SUBJECT: Executive Order 12372 Review

APPLICANT: Tennessee Valley Authority

PROJECT: DEIS: Mountain Reservoirs Land Management Plan (Chatuge, Hiwassee, Blue Ridge, Nottely, Ocoees 1, 2, and 3, Apalachia, and Fontana Reservoirs - GA, NC, TN

STATE ID: GA080811008

FEDERAL ID:

DATE: 9/23/08

This notice is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impact, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.

This notice is not consistent with:

- The goals, plans, policies, or fiscal resources with which this organization is concerned. (Line through inappropriate word or words and prepare a statement that explains the rationale for the inconsistency. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).
- The criteria for developments of regional impact, federal executive orders, acts and/or rules and regulations administered by your agency. Negative environmental impacts or provision for protection of the environment should be pointed out. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

This notice does not impact upon the activities of the organization.

NOTE: Should you decide to FAX this form (and any attached pages), it is not necessary to mail the originals to us. [404-656-7916]

SEP 23 2008
STATE CLEARINGHOUSE

Form SC-3
Sept. 2007
TOTAL P. 02

Georgia State Clearinghouse (continued)

**GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS**

TO: Barbara Jackson
 Georgia State Clearinghouse
 270 Washington Street, SW, Eighth Floor
 Atlanta, Georgia 30334

FROM: MS. PEGGY LOVELL
 GEORGIA MOUNTAINS RDC

SUBJECT: Executive Order 12372 Review

APPLICANT: Tennessee Valley Authority

PROJECT: DEIS: Mountain Reservoirs Land Management Plan (Chatuge, Hiwassee, Blue Ridge, Nottely, Ocoees 1, 2, and 3, Apalachia, and Fontana Reservoirs - GA, NC, TN)

STATE ID: GA080811008

FEDERAL ID:

DATE: 8/19/08

This notice is considered to be consistent with those state or regional goals, policies, plans, fiscal resources, criteria for developments of regional impact, environmental impacts, federal executive orders, acts and/or rules and regulations with which this organization is concerned.

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- The goals, plans, policies, or fiscal resources with which this organization is concerned. (Line through inappropriate word or words and prepare a statement that explains the rationale for the inconsistency. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).
- The criteria for developments of regional impact, federal executive orders, acts and/or rules and regulations administered by your agency. Negative environmental impacts or provision for protection of the environment should be pointed out. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).

This notice does not impact upon the activities of the organization.

NOTE: Should you decide to FAX this form (and any attached pages), it is not necessary to mail the originals to us. [404-656-7916]

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 STATE CLEARINGHOUSE

Form SC-3
 Sept. 2007

Georgia State Clearinghouse (continued)

GEORGIA STATE CLEARINGHOUSE MEMORANDUM
EXECUTIVE ORDER 12372 REVIEW PROCESS

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: MR. PHIL FOIL
DEPARTMENT OF COMMUNITY AFFAIRS

SUBJECT: Executive Order 12372 Review

APPLICANT: Tennessee Valley Authority

PROJECT: DEIS: Mountain Reservoirs Land Management Plan (Chatuge, Hiwassee, Blue Ridge, Nottely, Ocoees 1, 2, and 3, Apalachia, and Fontana Reservoirs - GA, NC, TN)

STATE ID: GA080811008

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- The goals, plans, policies, or fiscal resources with which this organization is concerned. (Line through inappropriate word or words and prepare a statement that explains the rationale for the inconsistency. (Additional pages may be used for outlining the inconsistencies. Be sure to put the GA State ID number on all pages).
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SEP 24 2008

Form SC-3
Sept. 2007

STATE CLEARINGHOUSE

Georgia State Clearinghouse (continued)

Georgia Department of Natural Resources

Noel Holcomb, Commissioner

Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer
34 Peachtree Street, NW, Suite 1600, Atlanta, Georgia 30303
Telephone (404) 656-2840 Fax (404) 657-1040 <http://www.gashpo.org>

MEMORANDUM

TO: Barbara Jackson
Georgia State Clearinghouse
270 Washington Street, SW, Eighth Floor
Atlanta, Georgia 30334

FROM: Elizabeth Shirk 
Environmental Review Coordinator

RE: **Mountain Reservoirs Land Management Plan**
Applicant: Tennessee Valley Authority (TVA)
Towns, Fannin, and Union Counties, Georgia
GA-080811-008

DATE: August 22, 2008

The Historic Preservation Division (HPD) has received information concerning this undertaking directly from the applicant, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended. The previously received file is HP-080811-008. All HPD review comments concerning this undertaking will be submitted directly to the TVA or their designated consultant.

ES:mav

TVA Response:
Comment noted.

City of Hiawassee

Mayor
Barbara Mathis

City Clerk
Wylene White

City Manager
Richard H. Stancil

City Attorney
Stephanie W. McConnell

City of Hiawassee
- ON BEAUTIFUL LAKE CHATUGE -

229 Chatuge Way
Hiawassee, GA 30546

Phone (706) 896-2202
Fax (706) 896-4997

Council

Annie Johnson
Jay Chastain, Jr.
Penny Runion
Janet Allen
Howard Cunningham

August 25, 2008

Mr. Evan Crews
Watershed Supervisor
Chickamauga-Hiawassee Watershed Team
Tennessee Valley Authority
221 Old Ranger Road
Murphy, North Carolina 28906

Re: City of Hiawassee, Mountain Reservoirs Land Management Plan; City of
Hiawassee Resolution supporting the Tennessee Valley Authority, Alternative C.

Dear Mr. Crews:

Attached please find a copy of the above referenced Resolution adopted by the City of
Hiawassee at the City Council Meeting held on August 5, 2008.

Respectfully,

Richard H. Stancil
City Manager

cc: Mayor Barbara Mathis

City of Hiwassee (continued)

RESOLUTION # 0160

**CITY OF HIAWASSEE RESOLUTION
SUPPORTING THE TENNESSEE VALLEY AUTHORITY
MOUNTAIN RESERVOIRS LAND MANAGEMENT PLAN, ALTERNATIVE C**

WHEREAS, the Tennessee Valley Authority ("TVA") develops reservoir land management plans to facilitate management of public land around its reservoirs by identifying land for specific uses and requests for use of public land; and

WHEREAS, TVA has prepared a Draft Environmental Impact Statement (DEIS) to assess the potential effects of alternative ways of managing its public lands on the nine mountain reservoirs include in its Draft Land Management Plan;

WHEREAS, TVA is seeking public input and comment to develop a management plan that will support TVA goals, balance competing demands for reservoir lands, respond to the need of TVA stakeholders, and meet TVA responsibilities to protect natural and cultural resources; and

WHEREAS, the City of Hiwassee has received briefings on the Draft Mountain Reservoirs Land Management Plan and is supportive of TVA's efforts and wishes to comment on the current plan; and

WHEREAS, Alternative C to the Mountain Reservoirs Land Management Plan includes new land use allocations for three tracts located on Lake Chatuge, one tract which adjoins the City of Hiwassee and is adjacent to the City of Hiwassee Water Treatment Plant and water intake.

NOW, THEREFORE, BE IT RESOLVED by the City Council that the City of Hiwassee voices its support for Alternative C to the Mountain Reservoirs Land Management Plan which includes the new land use allocations for the three tracts or parcels on Lake Chatuge.

BE IT FURTHER RESOLVED, the Mayor and City Manager are hereby authorized to take all appropriate action to advise TVA and the public of the City's support of Alternative C.

BE IT FURTHER RESOLVED, that a copy of this Resolution be provided by the City Manager to the Chickamauga-Hiwassee Watershed Team Office, Murphy, North Carolina and to the NEPA Resources Office, Chattanooga, Tennessee.

This Resolution is adopted and effective, this 5TH. Day of August 2008.

-400-

TVA Response:

Comment noted.

Town of Murphy

Town of Murphy

*Commissioners
Frank E. Dickey
David C. Hilton
Phillip R. Mattox*

*William N. Hughes, Mayor
P.O. Box 130
Murphy, North Carolina 28906
(828) 837-2510 • Fax (828) 837-9612
town_of_murphy@verizon.net*

*Commissioners
Sandra N. Sumpter
Margaret M. Warner
William J. Wells*

Wednesday, August 13, 2008

Penny Grace Judd, Manager
Valley Relations
Tennessee Valley Authority
1101 Market Street, SP 2A - C
Chattanooga, TN 37402

Dear Ms. Judd,

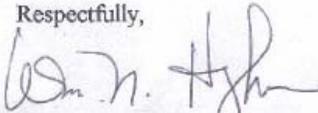
First, allow me to say how much I enjoyed meeting with you and your associates recently. Our meeting was very professional and beneficial.

I would like to endorse Alternative C because it meets our immediate and future needs. This will be a benefit to the people of Murphy and the surrounding area. I would like to also request parcels #34 and #49 for immediate consideration.

I think this situation is an excellent example of the Tennessee Valley Authority working with a small town for the common good of the area. Working together makes things better for everyone.

Thank you with kindest regards.

Respectfully,



William N. Hughes, Mayor

Anna A. Payne, Town Manager - Cowan & Cowan, Attorneys

TVA Response:

Comment noted.

General Comments

General

Comment 1: “We found some of these charts to be misleading: Appendix E includes charts for the various reservoirs noting the use of the land and the various Alternatives. First, there is no “key” so that the consumer can immediately read the chart and decipher exactly what the numbers and letters represent. For example, no where in Appendix E is there a chart showing the various Zone numbers and what they represent. I am sure the TVA staff knows the Zone numbers and definitions since they use this language on a regular basis; but the consumer does not. Parcel 52 is shown on page 342. On the line for Parcel 52, it shows 9.4 acres - the total acreage for Parcel 52. Its Forecast Designation is “Public Recreation”. Under Alternative A, it shows Zone 4 (Resource Conservation); under Alternative B, it also shows Zone 4. Under Alternative C, it shows Zone 6 (Developed Recreation). According to this chart, Parcel 52 – in its entirety – has been requested/recommended to be changed from its current status of Resource Conservation to Developed Recreation. However, if one flips back to the front of the study, to page 24, there is another chart showing “Allocation Differences Between Alternative B and Alternative C”. In this chart, Parcel 52 is shown as 7.4 acres (not the 9.4 acres shown on page 342). It also cites requests from Hiawassee and Towns County that this parcel of land be available for a recreation area to include boat ramps, fishing piers and trails. Neither of these charts includes an asterisk or any kind of footnote alerting the public to the fact that the Blue Ridge Mountain EMC has requested that 2 acres of Parcel 52 be used for a power substation. I believe this is extremely misleading. It gives the appearance that TVA is hiding this fact from the general public. It also does not provide the full picture nor all the facts so that the general public can respond accordingly. How many people looked at the chart and determined that changing Parcel 52 from Resource Conservation to Developed Recreation was all right with them and thus felt no need to attend the open house or make any comment? They had no idea that a power substation was part of the plan.” (Commenters: Mark and Lindey Fitzgerald)

TVA Response: *The legend of the Appendix E table in the FEIS has been modified to address these concerns. Table 2-8 was also updated to show the correct acreage for Parcel 52 (6.1 acres) and Parcel 52a (1.9 acres). The potential use of a portion of Parcel 52 for an electrical substation was described in Section 1.5.3 of the DEIS; this section has been revised in the FEIS to clarify the allocations on Parcels 52 and 52a.*

Comment 2: “Attached is an excerpt from the Draft EIS, Chapter 3, Socio Economic Impacts. ‘Under Alternative B, the allocations for all parcels are consistent with existing land use. New development would be restricted to parcels that are already supporting the allocated use, such as expansion of an existing campground on a parcel zoned for Developed Recreation. TVA would continue considering requests for private water use facilities on TVA parcels with deeded access rights. Alternative B would maintain the existing land use and character of the reservoirs by not proposing new uses; therefore, socioeconomic trends are not expected to be impacted by this alternative.’ The assessment as written does not fully assess impacts associated with limiting future recreational development to the existing developed areas. As mentioned previously in the EIS the economies of affected communities are heavily dependent on tourism.

Great care should be taken to ensure availability of public lands for future recreational development. The EIS would be improved by additional economic data relative to demand and growth opportunities. There should be a wealth of information available from the affected counties relative to the value of tourism to them. I would suggest contacting county leaders to ensure they fully understand and support the developmental limitations that could occur under alternative B.” (Commenter: Timothy C. Gilbert)

TVA Response: *Alternative B involves updating the previous forecast system designations to conform to the current zone system based on current uses and allocating previously unplanned tracts according to their current and committed uses. Although this alternative does allocate only existing developed recreational areas to Zone 6, this land plan is designed to guide land use decisions through the current planning cycle, meaning that new recreational development would not be permanently foreclosed under any alternative. In addition, other mountain reservoir lands not owned by TVA would be available both in the interim and long term for new recreational developments. Local governments and private entities and persons were given the opportunity during the development of the MRLMP EIS to request that TVA lands be allocated for recreational use in the land plan, and TVA considered the requests that were received in developing Alternatives C and D. As shown in FEIS Table 2-11, Alternative C allocates slightly less land to developed recreation while Alternative D, TVA’s preferred alternative, allocates slightly more land to developed recreation. These differences are the results of a needs assessment, requests from county leaders and others, and public comments on the DEIS.*

Aggregated Comment 3:

The economic analysis needs to consider recent changes in the economy when evaluating the economic benefits of changing the zoning on TVA reservoirs, especially Parcel 10 on Chatuge Reservoir. (Commenters: Annette Gelbrich, Joan Neville)

TVA Response: *TVA considered both short-term and long-term economic trends and needs when developing this land plan, which is to guide the management of the mountain reservoir lands until the next planning cycle. The proposed allocation of Chatuge Parcel 10 to Zone 5 for future industrial use under Alternative C would result in the potential for the creation of up to 350 new jobs. As described in FEIS Section 3.2.12.2, it could also result in other economic benefits including increased property tax revenues but could adversely affect the value of surrounding properties. Under TVA’s preferred alternative (Alternative D), Parcel 10 would be allocated to Natural Resource Conservation (Zone 4).*

Aggregated Comment 4:

Use TVA lands for recreation only, not for industrial or commercial development. (Commenters: Sandy Arnold, Mrs. Sandra L. Boyer)

TVA Response: *Comment Noted.*

Comment 5: “Further proposed development on these reservoirs for recreational and other uses above and beyond a power substation, however, will significantly impact the

water quality and the aesthetic value of these reservoirs.” (Commenter: Stephen B. Shepherd)

TVA Response: *Comment noted.*

Comment 6: “The other thing I think that ought to happen is that the money that comes in from the Federal government should go directly into the general fund of the State like it used to prior to Jimmy Carter and be administered to the non-elected officials, the bureaucrats, and then we would have, I think, correct administrative process. Right now, we don't have that. They have the money. They can hold it over the elected officials' heads and say, you mess with the lake, we won't give you the money for the road, the bridge or whatever. So I think we've got some real problems with the State and with these lakes and the overdevelopment. This entire mountain area has suffered dearly and is going to suffer even more if we continue to let this development go on and on and on. So I'm thinking a moratorium and over time more regulated growth.” (Commenter: Roy Underwood)

TVA Response: *Under the preferred Blended Alternative (Alternative D), approximately 7.7 acres out of 6,220 acres on the nine mountain reservoirs would be allocated to more development-oriented uses. However, additional residential development is likely to occur on back-lying private properties around the mountain reservoirs; TVA has no control over that development.*

Comment 7: “The support and cooperation that TVA has provided to Towns County and particularly to their Parks and Recreation Department has been exceptional and is appreciated. We await with keen interest the publication of your comments and hope that our comments are a constructive part of your recommendations to the TVA Board.” (Commenter: Richard Griffin (Chatuge Environmental Foundation, Inc.))

TVA Response: *Comment noted.*

Comment 8: “Include a 150 foot buffer natural, no-disturbance zone along shoreline for developed zones. This is especially critical for heavy impact Zones 5 and 6. This buffer will help mitigate the runoff from the more intensely developed zones by acting as a filter for the water as well as by preventing soil compaction, which leads to additional runoff. Please note that this would preclude additional docks and beach swimming areas from being constructed. Also note that it will still be important to control the non-native invasive species in this buffer area... Any proposed greenway should use permeable concrete or permeable blacktop. Parking areas should use pavers wherever possible. Picnic areas could use mulch or other permeable material, as appropriate.” (Commenter: Annette Gelbrich)

TVA Response: *TVA may require buffers for projects on Zones 5 and 6 where they are appropriate. Similarly, as a condition of approval for the use of certain Zone 7 shoreline properties, TVA frequently requires the implementation of shoreline buffers. For these situations, buffers would be tailored to the specific needs of individual projects. On parcels allocated to Zones 5 and 6, TVA routinely requires the use of appropriate best management practices to protect water quality. Under TVA's Shoreline Management Policy (SMP), long-term goals for shoreline management balance shoreline development, recreation use, and resource conservation needs in a way that maintains the quality of life and other important values provided by the reservoirs. Specifically, the SMP provides*

provisions for a 50-foot Shoreline Management Zone buffer to be preserved on TVA properties fronting newer developments built November 1999 and after. In addition, state storm water permitting regulations are aimed at reducing runoff.

TVA Policy

Comment 9: “In order to prevent any more water pollution, why not use grants to clean up the lake water and preserve it for the generations to come? I want my daughter (now age 9) and her children to be able to swim safely in Chatuge.” (Commenter: Robin Blair)

TVA Response: *Where appropriate, TVA partners with state and local agencies and private entities that may be able to obtain grants for this purpose. TVA does make efforts to maintain and/or improve water quality by requiring the use of best management practices during construction and operation of TVA-approved facilities; the implementation of such measures is frequently a condition of approval. TVA also partners with others and provides matching funds to improve water quality through its Water Quality Initiatives Program; for information on this, contact TVA’s Murphy Watershed Team Office in Murphy, NC (828-837-4520).*

Comment 10: “In addition, some property owners are making beaches near the 1926 elevation line by hauling in tons of sand each year, a clear violation of TVA regulations. Yet nothing is being done to prevent these violations. TCHA has members who have complained to TVA and TVA’s response has been that it is the county’s responsibility to enforce sedimentation issues. One member states that he has seen at least 2 loads of sand, 5 tons each, dumped below the 1933 elevation line in one year. Most of this loose sand will wash into the lake within a year. The problem is that all this sand along with other sedimentation is rapidly displacing water, not a desirable feature of properly managing a lake. It is highly unlikely that you will find these examples of management in the Private Investor Owned Electric Utility Industry where the utilities have a fiduciary responsibility to shareholders, customers and State Public Utility Commissions. It is time for TVA to take control and properly manage its assets.” (Commenter: TCHA)

TVA Response: *The placement of fill material in a TVA reservoir, on TVA-controlled shoreline, or on shoreline over which TVA exercises a flowage easement is subject to TVA approval under Section 26a of the TVA Act.*

Comment 11: “Somewhere, it must be understood that to forfeit the land in control of the TVA for private use, violates the tenets of the original concept the land was initially put in that trust for. As aptly stated by one of my neighbors: ‘They would be most interested in comments regarding devastation to the quality of Lake Chatuge (clearcutting trees, runoff into an already “poor” quality lake, destroying natural scenery and animal/bird habitats, etc.) and crowded lake conditions in a narrow area bounded by the fair grounds causing a safety hazard. They could care less about the noise, lights, traffic, and property values we have to contend with.’ In summary I wish to be one of hopefully, many, who resoundingly think the proposal is a poor idea and would do nothing to enhance the area, but instead increase pollution of both land and water.” (Commenters: Greg and Anne Eickwort)

TVA Response: *TVA has the authority to dispose of property for a variety of purposes. Property is sold or transferred if it is identified as no longer being*

needed or would not support one of TVA's missions. TVA then may dispose of the land only in a manner authorized by the TVA Act or other federal laws. In general, the TVA Act provides the authority to sell surplus land at public auction to the highest bidder or through Section 4(k) for limited purposes. However, pursuant to the TVA Land Policy, TVA is committed to preserving reservoir lands remaining under TVA control in public ownership. Responses to all comments received on the DEIS are presented in the FEIS.

Comment 12: "BUT putting industry on the shoreline when there seems to be plenty of land available in Towns County for sale without putting industry or a public utility substations on the shoreline makes no sense. Attracting new industry is the job of local government. It does not need what little shoreline remains. How can an organization such as the TVA that was formed to protect and preserve the land and waters they oversee be so blind? This organization could have not been successful for so long if they did not keep this covenant to protect. No public utility's pressure or local government who is not doing their job with their local economy should be able to divert the Tennessee Valley Authority from doing their primary duty which is to protect and care for the land and water in which they have been entrusted." (Commenters: James H. and Judy T. Burrell)

TVA Response: *Comment noted. With appropriate environmental reviews, TVA does permit industrial use of its reservoir lands, as described in Table 2-1. However, TVA gives preference to industrial development that requires water access.*

Comment 13: "How is it possible for public land to be "rented", sold, or used for private and/or corporate use." (Commenter: Ross A. Blair)

TVA Response: *The TVA Land Policy (see Appendix A of the FEIS) articulates TVA's policy on property disposals. TVA has the authority to dispose of property for a variety of purposes. However, pursuant to the Land Policy, TVA is committed to preserving reservoir lands remaining under TVA control in public ownership, except in rare instances in which the benefits to the public will be so significant that transferring lands from TVA control to private ownership or another public entity is justified. Although the circumstances under which TVA would transfer ownership of reservoir property are limited, TVA often collaborates with public and private partners to enhance the public benefit derived from use of TVA land. These collaborations sometimes result in the leasing or the granting of easements to these partners for management of TVA land. Table 2-1 of the FEIS describes the types of uses permitted on TVA land.*

Comment 14: "Redefine Zone 7, Shoreline Access to protect water levels and quality. Require longer walkways to docks as a way of providing a buffer zone without encroaching too far within private property lines. This will help preserve the integrity of the shore/beach area and allow it to develop into a more pristine, and possible sanctuary, area for waterfowl. Prohibit pumping of public reservoir water for private landscaping use of other private use." (Commenter: Annette Gelbrich)

TVA Response: *The Zone 7 allocation does not directly address water levels or water quality. TVA regulates shoreline development on Zone 7 tracts through its Section 26a regulations and Shoreline Management Policy as described in*

Section 1.4 of the FEIS. TVA operation of the reservoir system, including the management policy for maintaining water levels, was addressed in the Reservoir Operations Study.

Comment 15: “Add to budget for invasive, non-native species eradication. In order to ensure the healthy diversity of the flora and fauna, it is necessary to add time, personnel and budget to eradicate invasive, non-native species. As stated on page S-5, “Without widespread action, invasive species would continue to proliferate, which would result in a decrease in forest productivity, forest use, and management activities, as well as the degradation of plant diversity and wildlife habitat.” This is not only for Alternatives A and B, but also C, since invasive species appear to thrive most on disturbed land.”
(Commenter: Annette Gelbrich)

TVA Response: *Comment noted. As described in the FEIS, TVA is aware of the adverse impacts caused by invasive species. TVA does manage invasive species under some circumstances and acknowledges the benefits of increasing its invasive species management efforts.*

Comment 16: “For future planning initiatives, and specifically during the revision of the MRLMP at the end of the 10-year period, HRWC recommends that TVA divide Zone 6 into two sub-categories: 6a – low intensity developed recreation and 6b – high intensity developed recreation. The uses projected for each category should be based on an estimated percentage of impervious surfaces associated with the use. For instance, greenways (simple strip of paved surface with one or two restroom facilities and a small parking area) would be low intensity developed recreation; a resort marina or a large sports complex would be examples of high intensity developed recreation.”
(Commenter: Gilbert S. Nicolson)

TVA Response: *Comment noted.*

Comment 17: “At the time we purchased our family lake retreat on Chatuge seven years ago or so, we believed that TVA would continue to be good stewards of this great natural resource. It looks as though the profit and loss impact outweighs any common sense and social responsibility at TVA. I can tell you all that folks that own lake property these days and that you all are impacting with your actions are not a bunch of illiterate bumpkins. You are dealing with business leaders and individuals that have the wherewithal to organize and make things uncomfortable if you decide to embark on this strategy. Frankly, if public opinion means anything, you all could be in for a public relations disaster. Just a word to the wise before you poke a stick in the hornets nest.”
(Commenter: Doug Hadaway)

TVA Response: *Comment noted.*

Comment 18: “I have been coming to Lake Chatuge all of my life and have seen many changes, but I have always found that the TVA managed the lake with an emphasis economic and environmental ethics. There are not many places like this left in our country and it would be shame to make a decision without a careful study of its future consequences.” (Commenter: Joel Rice)

TVA Response: *Comment noted. The FEIS addresses the consequences of the proposed land use changes.*

GENERAL COMMENTS

Comment 19: “I believe that TVA should continue to be the good steward that they are and protect this land.” (Commenter: Mattie Chapin)

TVA Response: *Comment noted.*

Aggregated Comment 20:

TVA should protect and preserve its properties, regardless of any external pressures. (Commenters: John Beebe, Barbara Coffman, Paul and Petie Hodge, Jeff Powell, Barbara L. Russell, Barth Smith, Spencer Tunnell II, unknown)

TVA Response: *Comment noted.*

Comment 21: “Lake Chatuge - Promoting growth of any city or state is truly a sign of wealth, forethought and insures stability in the area. Lake Chatuge has been here since WWII. Why now after all these years, must TVA address new growth around the lake.” (Commenter: Ed Duben)

TVA Response: *The purpose of developing the MRLMP is stated in Section 1.2 of the FEIS.*

Comment 22: “TVA has a responsibility to ALL lake owners to keep Lake Chatuge in its pristine state. The leasing of more TVA land to Towns County would only add to the destruction of the surrounding beauty and environment of the lake. Towns County has on more than one occasion proven that they would eventually take this land and develop it as they see fit. Once it is in the hands of Towns County, the lake homeowners would have little say as to what is to be developed. The preservation of this lake is essential in the future revenues and monies that we receive from our tourists and homeowners. Do not let this land be rezoned. Lake Chatuge needs to stop the development and destruction of the lake. If land is leased to Towns County, then what is to prevent Clay County from asking for equal value and equal land? If the TVA wishes to lease land, then give the Lake Homeowners the same chance at securing this land for the preservation of the lake, not the destruction.” (Commenter: Judy Griffin)

TVA Response: *While drafting the proposed reservoir land plan, TVA asked the general public, local governments, and others to suggest future uses of the parcels being planned. Clay County did not request any changes in existing parcel allocations. Inasmuch as a homeowners association’s primary interests lie in residential uses, leasing lakefront property to a homeowners association is not consistent with TVA’s Land Policy. If a homeowners association were to submit a proposal for use of TVA land that is consistent with TVA’s Land Policy, such a proposal would be considered in due course.*

Aggregated Comment 23:

Without detailed plans, TVA is not able to adequately evaluate land use proposals or evaluate the environmental impacts of those uses. (Commenters: Mark and Lindey Fitzgerald, Nancy Johnson, William B. Johnson, Petition #2, Maureen Thompson)

TVA Response: *Allocation of a parcel to one of the seven zones means that the subject parcel is capable of (and perhaps, suitable for) supporting the subject use. Once the allocations have been made, TVA may entertain proposals to develop parcels if the proposal is consistent with the parcel allocations. Any request for the development or other use of TVA land or for transfer of property is*

GENERAL COMMENTS

subject to environmental review and approval by TVA. This environmental review will require the presentation of detailed plans and rationale for the request.

Comment 24: “It is my understanding that a portion of the subject property was acquired from my grandfather, Peter E. Mull, under duress, by the TVA. This was property that had been my great-grandfather’s. As a child, I clearly remember the sadness and anguish felt by my family as they were forced to give up their home and land. I remember going to his property with my parents and grandparents, and my grandmother weeping as she pointed out the house, barn, garden, etc. They were forced to find somewhere else to live, and could NOT replace what they were forced to give up. They grieved for their loss the rest of their lives. It is also my understanding, from my father, that a significant portion of their property was NOT needed for flowage easement, and has just say unused all these years. My father would go to the property from time to time, and on several occasions I went with him. It was always a sad time for him. It is my firm conviction that if TVA had no use for the unneeded property, it should have been offered FIRST to the families who were forced to give it up. If the TVA has no use for it, then let it remain as it is, a reminder of the past and of what our families sacrificed; their homes, their farms, their livelihood. They were, and are, the true owners of this land. I have Cherokee Indian heritage, and a deep love for this land. PLEASE don’t destroy my family’s heritage any more than you have already. I am also enclosing a copy of the deed from my grandfather, Peter E. Mull. You will note that it was not signed. He was a literate man, and DEFINITELY could sign his name. I question the legality of this transaction, and have referred this matter to my attorney for further research.”
(Commenter: Jeanna Mull Wimpey)

TVA Response: *The TVA Act authorizes TVA to acquire by purchase through eminent domain land and other property rights necessary to carry out the purposes of the TVA Act. Property is sold or transferred if it is identified as no longer being needed or if such sale or transfer would support one of TVA's missions. TVA may dispose of land only in a manner authorized by the TVA Act or other federal laws. In general, the TVA Act provides the authority to sell surplus land at public auction to the highest bidder under Section 31 or for limited purposes under Section 4(k). TVA has no statutory authority to return property without any restrictions to the original owners or their heirs or to give them preference in a land sale process.*

Comment 25: “I have read, with great interest, and great sadness, your proposals for use of TVA land on Lake Chatuge, specifically land development destruction of ‘Green Space’. If for no other reason, wouldn't it be better for our future generations to preserve what Green space we have than to develop it without regard for the impact on the environment and beauty of this place. Progress at what expense? Are there jobs to be justified in all of these proposals? Have the blunders of development in our National Parks not been lesson enough for you to put a halt to all of these "plans and proposals". Fifty years from now, when the lake is no longer at the same health level, when development has raped the Green spaces of animals and vegetation, will our grandchildren be able to say we did a good job of ‘protecting’ this wild and beautiful sanctuary? You hold such power to preserve, why are you afraid to do the right thing? Correct me if I am wrong, but is it not your responsibility to ‘maintain’ and ‘manage’. I do

believe ‘manage’ is a huge word that hold great responsibility, and that responsibility, and that responsibility is protect, not develop.” (Commenter: Barbara Coffman)

Comment 26: “It is from our hearts that we write to you, please put yourself in our positions. Beyond all of the environmental and economical hardships this would present, this plan may very well deteriorate the human spirit of our family and other beings as well. I have had the great opportunity to get to know and learn honest lessons from relatives I would otherwise have probably never met if it weren’t for our lot in these mountains. We go here, as others do, for reflection, for peace and serenity, for time and space away from the hustle and bustle of everyday life. Are you lucky enough to have a sacred place like this? We truly love and respect this land, generation after generation. I understand the town may have many things to gain from this opportunity, but is it worth forsaking the land to do it? Please ask yourselves: Does this path have a heart for all beings involved?” (Commenter: Natasha McConnell)

TVA Response: *Comments noted. Under TVA’s preferred alternative (Alternative D), less than 8 acres out of a total of about 6,220 acres on the mountain reservoirs would likely change to more development-oriented land uses. Except from the construction of shoreline facilities, TVA has little control over the development of a large portion of the lands surrounding the mountain reservoirs.*

Public Involvement

Comment 27: “I like the idea of TVA going to the public before they make decisions on new land use.” (Commenter: Doug Triestram)

TVA Response: *Comment noted.*

Comment 28: “TVA is the steward of these mountain reservoirs and wants to preserve the attributes that they offer, I strongly request that you consider any such rezoning deliberately and with comprehensive input from all impacted parties.” (Commenter: Richard Ludwig)

TVA Response: *Comment noted.*

Comment 29: “I think the open house format is limiting in that, you often received different information depending on who you spoke to at the event. I believe the public would be better served by a true public forum, where TVA presents the facts and the consumer asks questions and is able to comment. Everyone in attendance would then hear the same facts at the same time. In addition, there would be an official record of comments and opinions. Prior to the open house we went online and looked at the DEIS posted on the TVA website. As you know, it is a very lengthy document and is not written for the general public, rather it is written for the use of staff at the TVA. I would assume that very few people read it cover to cover. Instead, most consumers relied on the charts that serve as a summary of the findings as an easy way to get an overview of those reservoirs where they have an interest.” (Commenters: Mark and Lindey Fitzgerald)

TVA Response: *Comment noted. TVA strives to inform the public and to solicit public input in an effective manner. Because of the number of reservoirs*

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involved, the DEIS and FEIS are lengthy documents. However, these documents are arranged by reservoir, and both contain a summary in the front.

Comment 30: “Only additional information, public outreach, a sufficient comment period, and a community engaged with the TVA will save Lake Chatuge. The TVA has been good stewards of its resources, help the Lake Chatuge community be good stewards of theirs.” (Commenter: Gary M. Kopacka)

TVA Response: *Comment noted.*

Comment 31: “We recommend that the TVA approve Alternative A, stop the MRLMP process immediately, work directly the governments and communities in the TVA Mountain Reservoirs areas to evaluate the Plan and the proposed changes in Alternatives B and C, and then rework the Plan. The reasons for this recommendation are: 1. The TVA has not sufficiently involved the public and local governments to assist in creating a good plan. Those parties vehemently disagree with the TVA proposed actions for Lake Chatuge in Alternative 3, and the "independent process" (TVA 1.5.3 Land Use Proposals) being used by the TVA in secret to evaluate Lake Chatuge Parcel 52. 2. Public notification has been insufficient, and input that has been received has been ignored. A majority of the June, 2007 input preferred NO changes in existing land use. A planned meeting between Towns County and the TVA was agreed to, and then cancelled by the TVA. 3. A land use plan should adhere to the TVA's own rules and policies. Alternative C does not.” (Commenters: Brendan and Joan Neville)

TVA Response: *As described in Sections 1.5 and 1.6 of the FEIS, TVA involved the public during the scoping process and by soliciting comments on the DEIS. TVA used comments received during scoping to develop the three alternatives analyzed in the DEIS. Partly in response to comments received on the DEIS, TVA has developed a fourth alternative, the Blended Alternative, which is analyzed in the FEIS. As stated in Section 1.2 of the FEIS, the MRLMP will be used to guide land use approvals, private water use facility permitting, and resource management decisions. To that end, TVA has undertaken a land allocation process. To be considered by TVA, future requests or proposals for land use on a parcel must be consistent with the established allocation for that parcel. TVA has developed three alternatives under which the 360 parcels are each allocated to one of six zones. TVA realizes that the allocations proposed under any one alternative will not please everyone. Nevertheless, all of the alternatives were developed in accordance with TVA procedures and are consistent with TVA policies.*

Aggregated Comment 32:

Local landowners and homeowners were either not informed or not given enough time and were excluded from the process. (Commenters: Mark and Lindey Fitzgerald, Judy Griffin, Richard Griffin, Gail Herring, Matthew Humphreys, Robert Moffit, Robin Roberts, TCHA)

TVA Response: *As described in Sections 1.5 and 1.6 of the FEIS, TVA involved the public during the scoping process and by soliciting comments on the DEIS. TVA sent copies of the DEIS and notification of release of the DEIS to stakeholders who commented during the scoping process. TVA did not send a notification to all landowners in the Tennessee Valley. Instead, TVA posted*

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notification of the release of the DEIS and comment period online, published notification in many local newspapers, and sent copies of the DEIS to private organizations. Copies of the DEIS were available on the TVA Web site, and paper copies were available on request. In addition, due to requests from the public, the public comment period for the MRLMP DEIS was extended 30 days, for a total of 78 days.

Aggregated Comment 33:

Some homeowners and landowners were not informed and need an extension to the comment period, an extension of the meeting date, or postponement of the action. (Commenters: Eric Adriansen, Jim and Jeannie Ahlberg, Casey Barnes, Erin Barnes, Norm Bennett, Tom Bennett, Ronnie Bickley, Mike Brewster, Carrie Carew, Scott Carew, Steve Carlyle, Tom Chapin, Sandy Chapin, Kim Carew Chicoine, Richard D Climo, Vivian Cutsler, Cynthia Darwent, Lynda B. Davis, Michael Derby, Jennifer Donohue, Michael Donohue, Maria Duben, Marlene Duke, William Duke, Virginia and Bruce Everett, Trudy Farkas, B.F. Farmer, Marjorie Fishman, Burt Franklin, Ed Gibson, Judy Griffin, Anita Golding, Doug Hadaway, David and Barbara Hansen, Dennis Havig, Lisa D. Hedges, Gail Herring, Glenn Hitchcock, Lee Fike-Holland, Winona Holloway, Karen Holmes, Kathryn Holmes, Linda Howard, Matthew Humphreys, John Kelso, M. Janice Russell King, William B. Johnson, Nancy Johnson, Patrick Johnson, Aletha Langham, Margaret Fortson Leslie, Bob Licata, Ben and Peggy Lilly, Richard Ludwig, Lane Martin, Tim and Linda McCormick, Sanders McCown, Irene McCown, Robert McCown, Andrew McCown, John McKenney, Cameron Milles, Jeanne Minichiello, Robert Moffit, Tony Morgan, Sylvia Neese, Linda Nelson, Truitt Nelson, John Neu, Greg Noojin, Rena Noojin, DeAnne L. Parks, Jim Perdue, Judy Perdue, C. Thomas & Shirla Petersen, Petition #2, Chris Pulley, Eddie Pulley, Nancy Pulley, E. B. Pulley, Joel Rice, Tommy Romine, Judy Rosasco, Cheryl and Margaret Russell, Larry and Janice Rutledge, Malcolm Scott, Stephen B. Shepard, Leonore Smallridge, Eugene Smith, Gerry Smith, Richard Storck, Sylvia Thorne, Maureen Thompson, Spencer Tunnell II, Patrick Turner, Baldy vanAnderberg, Carrie Whitaker)

TVA Response: *A notice of availability of the DEIS was published in the Federal Register on August 15, 2008, and in nine area newspapers in mid-August 2008. The public was initially invited to submit comments on the DEIS until September 29, 2008. Due to requests from the public, the public comment period for the MRLMP DEIS was extended to October 31, 2008, for a total of 78 days, and the extension was advertised in 11 area newspapers. An open house-style public meeting on the DEIS was held on August 27, 2008. Notice of the public meeting was published in nine area newspapers in mid-August 2008 and announced on TVA's Web site on August 21, 2008. TVA recognizes that some members of the public interested in commenting on the MRLMP DEIS were not able to attend the public meeting. To accommodate these and other citizens, TVA also accepted comments on the DEIS on TVA's Web site and by regular mail, e-mail, telephone, and facsimile.*

Alternatives A, B, and C

Comment 34: "My preference is to make no zoning or use changes to any of the parcels on any of the 9 TVA controlled lakes. I also prefer that no future use changes be made." (Commenter: Bruce G. Everett)

TVA Response: *Comment noted.*

Aggregated Comment 35:

TVA should adopt Alternative A, as this would ensure that Parcels 10, 52, and 77 would not be developed. (Commenters: William R. Coffman, Margaret Fralry, Barbara Gibson, Ralph Johnson, Robert and Karen Kopec, Steve Massell, Duane F. and Jean G. Miller, Brendan and Joan Neville, C. Thomas and Shirla Petersen, Wiley P. Thomas, Doug Triestram)

TVA Response: *Comment noted. Under the Forecast System, these three parcels were designated for public recreation. However, because there are no developed facilities on any of these parcels, they were considered to be in Zone 4 (Natural Resource Conservation) under Alternative A. The types of land uses and activities allowable under a Zone 4 allocation are described in Table 2-1. Dispersed recreation is an acceptable use under Zone 4, and such recreational use is indeed likely. TVA's preferred alternative is the Blended Alternative, under which Parcels 10 and 77 would be allocated to Zone 4, Parcel 52 would be allocated to Zone 6 (Developed Recreation), and Parcel 52a would remain allocated to Zone 4.*

Aggregated Comment 36:

We support adoption of Alternative B, as it would provide protection of Parcels 10, 52, and 77 on Chatuge Reservoir. (Commenters: Don H Berry, Michael B. Bever, J. Thomas Chapin, Richard Griffin, Nancy Johnson, Gilbert S. Nicolson, Petition #1, Petition #2, Petition #7, Bill Preye, Philip Alvin Scharer, Kenneth A. and Lorraine Sue Turner)

TVA Response: *Under Alternative B, Parcels 10, 52, and 77 would be allocated to Zone 4 (Natural Resource Conservation). The types of land uses and activities allowable under a Zone 4 allocation are described in Table 2-1. Dispersed recreation is an acceptable use under Zone 4, and such recreational use is indeed likely. TVA's preferred alternative is the Blended Alternative, under which Parcels 10 and 77 would be allocated to Zone 4 and Parcel 52 would be allocated to Zone 6 (Developed Recreation).*

Comment 37: "Upon review of the proposed 3 alternatives and their impacts, I would concur with Alternative C, as it will provide for additional recreational pursuits with negligible impacts to the environment." (Commenter: LuAnn Bryan)

TVA Response: *Comment noted.*

Aggregated Comment 38:

We are opposed to the adoption of Alternative C. TVA should not consider the additional development of shoreline lands. These properties should be kept as forested tracts for future generations. (Commenters: Cathy Barton, Janet Bentley, Sarah Berrong, Sally A. Brown, Petition #1, Petition #2, Petition #7, Steve Pulley, Maureen Thompson)

TVA Response: *Comment noted. Under Alternative D (TVA's preferred alternative), allocations on a total of 7.7 acres (Parcel 52 on Chatuge and Parcel 49 on Hiwassee Reservoir) could result in the development of recreation facilities on these two parcels. Except for water use facilities, TVA cannot prohibit*

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residential or commercial development on those portions of the shoreline that are not under its control or on back-lying private properties.

Lake Levels

Aggregated Comment 39:

Keep water levels high; do not let water levels fluctuate. This will help attract people in the winter when the lake levels are at their lowest. (Commenters: James L Boyer, James H. and Judy T. Burrell, J. T. Garrett, Marylinne Harper, Monica Merriell)

TVA Response: *Comment noted. As stated in Section 1.5.2 of the FEIS, the development of this reservoir land management plan will not affect lake levels.*

Comments about Chatuge Reservoir

General

Comment 40: “I do not understand what is going on. The only area I am concerned about is across from my residence Safe Harbor. What are you going to do in C2 [Chatuge] no 34?” (Commenter: D. T. Grass)

TVA Response: *Parcel 34 on Lake Chatuge fronts U.S. Forest Service property. Under Alternative A, Parcel 34 is considered unplanned land. Under Alternatives B, C, and D, Parcel 34 would be allocated to Zone 4 (Natural Resource Conservation). Thus, the land use of Parcel 34 is not likely to change under any of the alternatives.*

Aggregated Comment 41:

Why is TVA even considering a change of allocation for parcels on Chatuge Reservoir after all these years? (Commenters: James H. and Judy T. Burrell, William J. and Brenda R. Collins, John McKenney, Robert Moffit, Carl S. Shultz)

TVA Response: *The proposed allocation of Parcel 10 to Zone 5 (Industrial) under Alternative C was done in response to a request from BRMEMC. BRMEMC has since withdrawn the request. Parcel 77 was allocated to Zone 6 (Developed Recreation) under Alternative C in response to a request from Towns County and the City of Hiwassee. Parcel 52 was allocated to Zone 6 under Alternative C in response to a request from Towns County, the City of Hiwassee, and the Georgia Department of Natural Resources. All of these requests were considered valid.*

Comment 42: “It has come to my attention that you or should I say the ‘TVA’ is going to sell a parcel of land for a ‘plant’ of some sort. I as a citizen of Towns County, am very confused. We just moved back here last year, and was very excited in doing so. However, when I signed my 7 year old daughter up for coaches pitch T-ball I was extremely disappointed. The fields that these kids are expected to play on are a joke, same goes with soccer, which my daughter also plays. Do you not think that making these areas would not benefit out counties future, our children’s future much better than a plant that will pollute our air. Look at our neighboring counties, such as Rablin and Union. Seriously their Rec Depts put ours to shame. Do our children not deserve the same? If this was your home town, the place you were raising your children what would you want on that land?” (Commenter: Michelle Underwood)

TVA Response: *We are not clear if the comment is about Chatuge Parcel 10 or Parcel 52. Parcel 10 was proposed for industrial allocation because of a request from BRMEMC for a water intake for the nearby industrial park. No on-site manufacturing facilities were foreseen at that time. BRMEMC has since withdrawn the request. Under the preferred alternative (Alternative D), Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).*

Parcel 52 has been reviewed for potential future recreation uses and has been found to be suitable for and capable of supporting such uses. The allocation under TVA’s preferred alternative for Parcel 52 is Zone 6 (Developed

Recreation). Specific recreation proposals will be subject to an environmental review and suitability/capability studies.

Comment 43: “My Grandfather always told us that God is not making any more land and that we need to be good stewards of all that He has given to us. My Grandfather’s name was John Burton Russell, the Blue Ridge Mountain Land Conservation Supervisor from 1951 until his death in 1966. His concern for and understanding of maintaining our natural resources.” (Commenter: Cheryl Russell)

TVA Response: *Comment noted.*

Comment 44: “Lake Chatuge, and other TVA reservoirs, rank in my estimation with some of the most beautiful spots in this nation, and on the earth. This is due to the fact that much unspoiled natural shoreline surrounds and exists on land bodies within these reservoirs. This in turn attracts people to these reservoirs and the places around them. In contrast to many other lakes that have been spoiled, in terms of both beauty and water quality, these reservoirs still hold on to their aesthetic value.” (Commenter: Stephen B. Shepherd)

TVA Response: *Comment noted.*

Comment 45: “In 1986 Lake Chatuge fish population as follows; lake trout, small mouth bass, few spotted bass, white bass too many to number, large mouth bass; pan fish; catfish; hybrids; in 1991 - trout gone; 1995- small mouth bass gone; 1999 all white bass gone; 2005 very few panfish left; 2008 spotted bass increased and holding their own.” (Commenter: Herbert S. Gatch)

TVA Response: *Comment noted.*

Comment 46: “PLEASE RECONSIDER destroying this beautiful lake. In my opinion, the TVA should be focused on erosion, water quality and clarity, protecting our forests and wildlife, and limiting the sizes of boats on the lake--not destroying the environment to try to earn a profit.” (Commenter: John McKenney)

TVA Response: *TVA actively promotes improving water quality and protecting land resources in the Tennessee Valley. On Chatuge Reservoir, boating regulations are issued and enforced by the states of North Carolina and Georgia. The MRLMP is not profit-based.*

Aggregated Comment 47:

TVA is the guardian of an important resource on Chatuge. TVA should manage Chatuge lands wisely. (Commenters: Cheryl Russell, Barth Smith, Holly Williams)

TVA Response: *Comment noted.*

Comment 48: “The construction of Manufacturing Facilities or Electrical Substations on the shoreline of this natural and/or residential area would be an abomination.” (Commenter: Robert F. Astley)

TVA Response: *Comment noted.*

Comment 49: “Towns County and Young Harris have developed a draft joint comprehensive growth plan. While the plan will not be available until 2009, these municipalities admit in their own draft that the reservoir waterfront is ‘nearing immediate capacity from development and has recently been confronted with new development types including high density and high activity land uses.’ It also states ‘increasing development along the reservoir threatens the character of the communities.’”

(Commenters: J. Thomas Chapin, Mr. and Mrs. Henry Badach)

TVA Response: *Comment noted.*

Comment 50: “The Georgia Sport and Fishing Guide states that the Spotted Bass are a restricted fish in Lake Chatuge.” (Commenter: Edward Duben)

TVA Response: *The spotted bass is one of the most common and popular game fish in Chatuge Reservoir. The term “restricted” as used in the comment is unclear. The State of Georgia has statewide advisories about consuming fish due to concerns about potential mercury contamination.*

Comment 51: “I have lived in Towns County all my life and as a parent I would love to see our county provide nice recreational facilities for our kids in the form of baseball fields, etc. I know in the past TVA has played a major role in this and could again if ignorant people would put aside petty political differences but its probably not going to happen. The recreational facilities for our kids are no better than they were 30 years ago, I know because I came thru them. It always seems though because of a few idiots, everyone’s kids and mine have to be penalized. I know I have been all over the place in my conversation and for that I am sorry. I hope I have made my point. I’m not anybody in this world but I really would love to see the kids be able to have nice facilities to respect and enjoy because all we had is the same thing we got now.” (Commenter: Randy McConnell)

TVA Response: *Comment noted.*

Comment 52: “Please help the Towns County Kids! Signatures from Towns Co. residents. Petition to get soccer fields for Towns County.” (Commenter: Petition #3)

TVA Response: *Comment noted.*

Comment 53: “Shoreline erosion continues to increase, without official efforts to prevent it as we see a significant increase in the number of boats and PWCs and including larger and more powerful boats. The resultant wave action is increasing shoreline erosion at an alarming rate. One member has lost 18 inches of depth 128 feet out from the 1926 foot elevation line due to lack of sedimentation control. This property owner also states that he was losing 6 to 9 inches of bank at the shoreline each year. He obtained a permit and rip rapped his bank eliminating the problem. However, there are hundreds of banks without erosion control. Lake Chatuge is not large enough nor strong enough to accommodate this increase in size and number of watercraft. One can witness a 36 to 42 inch wake behind these boats. It is not unusual to see these boats perform ‘doughnuts’ that produce up to 48 inch wakes. The shore line becomes extremely muddy extending up to 300 feet off the shore.” (Commenter: TCHA)

TVA Response: *TVA encourages the stabilization of eroding shorelines and will work with shoreline landowners to design appropriate stabilization measures.*

Such measures, including the installation of riprap are subject to approval under Section 26a of the TVA Act. The cost of implementing stabilization measures is the responsibility of the shoreline landowner of the back-lying property. Please contact the TVA Watershed Team in Murphy, North Carolina (828-837-4520), for additional information on shoreline stabilization.

TVA's authority to control boat traffic is limited to the approval of boat docks, marinas, and launching facilities and the designation of harbor limits for marinas. Any future recreation development proposals for access or marina slips would be subject to an environmental review prior to TVA approval. The environmental review will consider water quality as well as boating density issues and water quality impacts. The regulation of boating on Chatuge is within the jurisdiction of the respective states.

Comment 54: "Now 70% of Towns County is U.S. Forestry, Ga. Forestry and TVA. If the other 30% is studied, very little can be used for recreation or parks because topography will not allow it. The parcels 10, 52, and 77 are needed for this present land use designations!" (Commenter: Wes Leroon)

TVA Response: *Comment noted. TVA conducts suitability/capability studies for all TVA parcels to determine the best uses. Once parcels receive zone allocations, TVA will accept and consider applications for proposals for specific uses.*

Comment 55: "As a parent of 2 school aged children who each year for the past 6 years have both been involved in the local area soccer and rec programs, I simply cannot stand idly by and watch the opportunity to create an environment in which my children can grow, learn and prosper safely. I say to you...how dare you consider giving up green space for my children." (Commenter: Kristina Albach)

TVA Response: *The land planning process considers all resources and needs. Many parcels have been designated Zone 4 for natural resource conservation and dispersed recreation needs as well as Zone 6 for developed recreation needs.*

Comment 56: "Parcels 52 and 10 would be much smaller parks with practice fields. Blue Ridge Mountain EMC can find a better suited location for their substation & we already have an industrial park in place that currently only a small fraction of it is being used. We do not need to use precious TVA land for that. If recreational park use cannot be retained, then the TVA should leave it to the wildlife untouched." (Commenter: Kim Patterson)

TVA Response: *Location of a substation on a portion of Parcel 52 is described in the EA "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia." The remainder of the original Parcel 52 has been divided into two subparcels: a 6.1-acre tract now known as Parcel 52 in the FEIS and a 1.9-acre tract known as Parcel 52a in the FEIS. Parcel 52 would be allocated for developed recreation use under Alternative C and the preferred alternative (Alternative D). Parcel 52a would be allocated to Zone 4 (Natural Resource Conservation) under Alternative D.*

Parcel 10 was allocated to Zone 5 (Industrial) under Alternative C in response to a request from BRMEMC to accommodate a water intake to serve the nearby industrial park; no manufacturing facility or industrial park was proposed on Parcel 10 by BRMEMC. Under Alternative D, Parcel 10 would be allocated to Zone 4.

Comment 57: "It would appear to me that with all the land that is available for these projects, that we could find something not on the lake. This lake is the life blood along with the Mtns, these projects bring property values down. There is only so much land, lets try and keep this county beautiful." (Commenter: Unknown)

TVA Response: *The TVA MRLMP deals only with land entrusted to TVA. As stated in the DEIS and FEIS, parcel allocations are made based on several factors, including requests for use of a property.*

Comment 58: "Lake Chatuge is one of the most beautiful lakes in the N. Georgia area. If we do not control access and pollution it will not be that way long." (Commenter: Judy Southern)

TVA Response: *Comment noted.*

Comment 59: "If the TVA wishes or needs to sell this property, I will buy it." (Commenter: Charlie Hendon)

TVA Response: *Comment noted.*

Comment 60: "Year after year for the past five decades our family from around the country has gathered in this part of the northern Georgia mountains. This is a sacred place to not only the habitat but also for our family and other families that have been spending time, making memories and attempting to sustain the integrity of the land and its rustic nature. It is challenging enough to stomach the inevitable development and returning to see McDonald's on the corner, as well as other corporate establishments that contribute to the hastened mentality of profitable business in America. This was a place of quaint, relaxed southern culture when I was young, and as I said, some major change in the form of industry, smoke, pollution, concrete and a very visible footprint is unfortunately the reality of progression in some parts of the world." (Commenter: Natasha Darwent)

TVA Response: *Comment noted.*

Comment 61: "I agree for recreational development (ball fields, parks, fishing piers and swimming areas) but NO industrial/commercial development anywhere in any of the TVA lakes." (Commenter: Mrs. Sandra L Boyer)

TVA Response: *Comment noted.*

Comment 62: "I support the need for additional infrastructure, but I do not think taking beautiful prime high dollar lakefront for this purpose makes any sense whatsoever. The lake front property one day in the future can provide additional energy consuming customers if it is not squandered by installation on infrastructure that can be placed on less desirable property." (Commenter: Jerry and Renee Montrose)

TVA Response: *Comment noted.*

Towns County Government

Comment 63: “As for eye appeal, Towns County needs to preserve the beauty along the Lake Chatuge shoreline at all costs. Especially, since the main roads travel so closely to the lake. Residents and visitors to Towns County should not be cursed to look at substations or industrial building/equipment destroying the beauty of the lake for the rest of our lives and future generations.” (Commenter: Kim Patterson)

TVA Response: *Comment noted.*

Comment 64: “The observation of many in this community, many of whom I’m sure you have heard from, are similar to mine. Particularly, Towns County has not demonstrated neither its desire nor ability to properly maintain and hold for the public’s benefit the lake front land that it acquired from the TVA. This is evidenced by the lack of control of sewer effluence into the lake both from the pump station on Rt 76 and the Georgia Mountain Campground, south of Rt 76. The most extreme incident has been the long term leases by Towns County with Shoney’s and now the Ramada Inn on land that was transferred to from TVA to the county for recreational use as a part of the Georgia Mountain Fairgrounds. The obvious conclusion is that Towns County is not a good steward of the lands provided to them from the TVA. Towns County’s primary motivation for wanting these parcels is the cost not the benefits that are being espoused.” (Commenter: Richard Ludwig)

TVA Response: *The Shoney’s and Ramada Inn are located on TVA land (Parcel 29) under easement to Towns County for park purposes. Parcel 29 is allocated to Zone 6 (Developed Recreation) under all of the alternatives, as it represents a “committed” use of this parcel. Restaurants and lodges are consistent with Zone 6 uses (see Table 2-1 in the FEIS).*

Comment 65: “The real intention of this project is to be the legacy of one man and is a part of his political agenda. We are in dire need of sewer and water system upgrades which, we are told, we cannot afford. Yet our county puts \$500,000 at a time into certificates of deposit at the bank. It is obvious from other county projects that the county has no regard for quality. If they develop Parcel 77, I would hate to see the completed results.” (Commenter: William J. Pierson)

TVA Response: *Comment noted.*

Aggregated Comment 66:

There is a lack of environmental stewardship on the part of local government on the properties it maintains. There is poorly regulated development, building codes are weak, and activities that could cause water pollution are policed inadequately. (Commenters: Sandy Chapin, Ed Gibson, Glenda Giles, Pam Kirk, Robert Moffit, Ed and Ellen Moore, Thomas B. Nichols, Kristin Preye, Gerry Smith)

TVA Response: *Comment noted. Concerns about local governments may be more effective if directed to the appropriate government entity.*

Aggregated Comment 67:

Towns County's use of TVA land may be in violation of state and federal laws. (Commenters: Eric Adriansen, Eugene Smith, Nancy Johnson, Patrick Johnson)

TVA Response: *TVA monitors the use of TVA land for compliance with relevant laws. The commenters may contact TVA to provide more detailed information about any alleged violations of laws at particular sites.*

Aggregated Comment 68:

Towns County might use property acquired from TVA for purposes other than developed recreation. For example, the recreation building itself has no relationship to the lake. Most of the facilities on the Georgia Mountain fair property, including the Shoney's, the motel, the fairgrounds, and the Anderson Music Hall, have virtually no connection to the lake. (Commenters: Edward Duben, Ed Gibson, Judy Griffin)

TVA Response: *If TVA were to transfer property to Towns County, restrictions would be placed in the deed. These restrictions would stipulate acceptable land uses.*

Aggregated Comment 69:

There is dissatisfaction and a lack of trust of Towns County government due to its history of local government manipulation and violation of laws. (Commenters: J. C Berrong, Richard D. Climo, Jeanna Mull Wimpey)

TVA Response: *Comment noted.*

Chatuge Woods Campground

Aggregated Comment 70:

Towns County has been a poor steward of the Chatuge Woods Campground; it is unsightly and is causing water pollution. TVA should not transfer land to Towns County. (Commenters: J. C. Berrong, Katherine Bever, Michael B. Bever, Edward Duben, J. Thomas Chapin, Pravin Ghandi, Ed Gibson, Jim and Donis Hendry, Ed Gibson, Ed and Ellen Moore, Charles K. Kraus (TCHA))

TVA Response: *TVA is aware of problems at the Chatuge Woods Campground. TVA recently conducted an electrical safety inspection of the site and noted several issues. Discussions for remedying these issues are underway.*

Aggregated Comment 71:

TVA should take back Chatuge Woods Campground from the county because it has not been managed well. (Commenters: Rebecca Beal, J. C Berrong)

TVA Response: *Comment noted.*

Oppose Development

Comment 72: "The last management plan as I recall determined that TVA would continue to manage the lands fronting Chatuge Reservoir in the same manner as in the past with no lands released for private development. I was under the impression that

lands would also not be released for more recreation facilities and a power substation which could be located away from the lake and not impact visitor use of the reservoir.” (Commenter: Bill Herold)

TVA Response: *Chatuge Reservoir has not been planned since the 1960s, when TVA used the Forecast System. The Forecast System was an in-house process to document actual and prospective uses for all TVA public land around a reservoir. TVA made no commitments in its Forecast System planning regarding the future disposal of land or landrights for various purposes.*

Comment 73: “Public comments received to date are also overwhelmingly opposed to industrial development on any of the TVA lake properties, including Lake Chatuge. According to TVA’s own Summary of Public Participation document, approximately 206 survey respondents believe that too much land is currently available for industrial/light manufacturing use while only 7 respondents felt that more land was needed for such use. See Summary at 27; Draft EIS at 8-9.” (Commenter: Gary Sheehan)

TVA Response: *As stated in Section 1.5.1 of the DEIS and FEIS, TVA received 473 comments during public scoping. These comments, along with the expertise and experience of TVA staff, were used to identify the range of issues and concerns that would be addressed in the FEIS. TVA also took into account the requests received for use of TVA-managed land.*

Aggregated Comment 74:

About 75 percent of the available shoreline is already developed. Further shoreline development is unwarranted and would hurt the environment. (Commenters: Mr. and Mrs. C. Jon Anderson, Edward Duben, Paul and Victoria Lajoie, Cameron Milles, Petition #1, Petition #7, Cheryl Russell)

TVA Response: *As illustrated in Table 3-2, approximately 57 percent of the shoreline of Chatuge Reservoir is available for residential development, as this property is considered residential access shoreline or is land over which TVA has a flowage easement. Approximately 75 percent of this available shoreline has been developed for residential use.*

Comment 75: “Add to budget for enforcement From looking at the Google Earth maps for Parcels 10, 52 and 77, it appears that the shorelines are already overly developed. From the comments I read in the ‘Summary of Public Participation,’ dated September 2007, I am extremely concerned about the effectiveness of enforcement efforts. In the General Comments section on page 7, littering, signage and maintenance are concerns, noted even by an elected official. For the Chatuge Reservoir, the comments deal with enforcement issues that affect both quality of life (loud noise, blaring music, unsightly, illegal storage facilities) as well as quality of the environment (Astroturf, erosion, runoff, lack of vegetative buffers). If it is not possible to effectively enforce current regulations for existing developed areas, it is unwise and irresponsible to consider any additional development whatsoever.” (Commenter: Annette Gelbrich)

TVA Response: *Comment noted. There are no existing developments on Parcels 10, 52, or 77. With respect to littering, signage, and maintenance, TVA works hard to prioritize its limited resources and addresses these issues when possible. With respect to loud music and other noise from boats, TVA has no jurisdiction over boating regulations; those types of regulations are within the*

jurisdiction of local governments. TVA is aware of the problems at the Chatuge Woods Campground and is taking steps to remedy the situation.

TVA monitors public lands and any associated commitments through a variety of inspection and compliance actions. The most common methods are the annual shoreline inspections and the random compliance inspections. The shoreline inspection process is designed to methodically look at the entire length of shoreline for every reservoir in the TVA system. The compliance inspection process is performed to ensure compliance with conditions of each permit inspected. In addition, specific projects may receive additional inspection during construction to ensure compliance with existing agreements. We also invite the public to report any suspected misuse to the appropriate watershed team.

TVA has several programs that promote clean water. TVA partners with and provides limited funds to counties for litter pick-up and litter education in their areas and also provides trash receptacles on TVA dam facilities and at select high use areas. In addition, TVA provides boater education through the Clean Boating Program and works with marinas to improve their best management practices for water quality through the Clean Marina Program.

Comment 76: "Much of the TVA website discusses TVA's responsibility to the land, the public and the environment. Yet, with TVA's proposed changes to Parcel 52 and Parcel 10 on Lake Chatuge, TVA would be negatively impacting the land, the public, the environment and the lake itself. Lake Chatuge is the cultural center of the city of Hiwassee and Towns County. Economic development, residential growth and tourism are all directly tied to the lake. TVA has a responsibility to support the continued smart growth of this region. Therefore, we strongly urge TVA to maintain the current designation of both Parcel 52 (the entire 9.4 acres) and Parcel 10 as Resource Conservation and to re-classify Parcel 77 as Developed Recreation with certain conditions in place. We sincerely hope that TVA will continue its strong tradition of stewardship by making the right and responsible decision." (Commenters: Mark and Lindey Fitzgerald)

TVA Response: *Comment noted.*

Aggregated Comment 77:

There is already a great deal of development around Chatuge Reservoir. Some of this development has been done without regard for the environment or the scenic qualities of the area. Further lakeshore development would adversely affect the character of the reservoir. Additional development of TVA lands is not needed and could occur elsewhere. TVA should not allow additional development on Chatuge Reservoir.

(Commenters: Marcia Abrams, Mr. and Mrs. Jon Anderson, Rebecca B. Beal, Janet Bentley, J. C Berrong, Sarah Berrong, Michael B. Bever, Joan Bever, Dr. Keith Bever, Terri Bever, Ronnie Bickley, Tom Bindewald, Robin Blair, Brian Bower, Max A. Brown, John Callen, J. Thomas Chapin, Sandy Chapin, James Childers, Barbara Coffman, William R. Coffman, Barbara Coffman, George and Virginia Colvin, Stephanie Donner, Maria Duben, Ed Duben, Donn French, Sara Ferguson, Robert E. Garbe, Barbara Gibson, Ed Gibson, Glenda Giles, Robert H. Graham, Virginia D. Harbuck, Mary Miller, Dennis Havig, Will Hearce, John Hedges, Bill Herold, Winona Holloway, Jackie Huffman, Gene and Fairy Jackson, Dee Dee Jacobs, Charm Jones, Tito Kalb, Pam Kirk, Lorraine Klug, William J. Klug, Jeanne Kopacka, Robert and Karen Kopec, Walter Krueger, Paul

and Victoria Lajoie, Wes Leroon, Penny W. Loftin, John McKenney, Carolyn Miller, Duane F. and Jean G. Miller, Cameron Milles, Jeanne Minichiello, Ilea Mitchell, Carol Moffit, Jerry and Renee Montrose, Stephen M. Morris, Rita Morrison, Sylvia Neese, Petition #1, Petition #6, Petition #7, Petition #8, Matt and Hava Preye, Bill Preye, Carmen Matos-Raia, Priscilla Richardson, Jonathan and Stephanie Roberts, Betty Rogers, Bob Rogers, Faye Rogers, Barbara L. Russell, Cheryl Russell, Margaret Arralu S. Russell, Golda Sanders, Philip Alvin Scharer, Jimmy Sherrill, Frederick Sickel, Leonore and Denny Smallridge, Stanley Southern, William S. Southern, Anton and Priscilla Stab, Gene A. Stalcup, Kimberly Tayloe, TCHA, Wiley P. Thomas, Stephen K. Thompson, Spencer Tunnell, Roy Underwood, Edward Wesson, Lynda Wesson, Linda Westergard)

TVA Response: *The allocations for Parcels 10, 52, and 77 were in response to requests for possible future land uses on those properties. BRMEMC has withdrawn the request to allocate Parcel 10 for industrial use. TVA has developed Alternative D (the Blended Alternative). Please note the allocations for these parcels presented under the Blended Alternative (see Section 2.2.4 in the FEIS). Under the Blended Alternative, Parcels 10 and 77 would be allocated to Natural Resource Conservation (Zone 4). The 6.1-acre Parcel 52, which is currently a field, would be allocated to Zone 6 (Developed Recreation). Towns County and the City of Hiwassee have expressed an interest in locating recreational facilities on Parcel 52.*

TVA cannot control development on lands that it does not own or manage.

Aggregated Comment 78:

TVA should consider suitable alternatives for any new development. There is plenty of developable land off the lake that will not negatively affect the lake in any way. (Commenters: Mr. and Mrs. C. Jon Anderson, Michael B. Bever, Robert E Garbe, Karen Holmes, Michael Jones, Paul and Victoria Lajoie, Susan Ohly, Petition #1, Petition #7, Matt and Hava Preye, Bill Preye, Kristin Preye, Cheryl Russell, Unknown)

TVA Response: *The MRLMP deals with properties under TVA control. TVA cannot issue a land plan for private properties it does not control. The allocations under Alternative C for Parcels 10, 52, and 77 on Chatuge Reservoir were made in response to requests by BRMEMC, the City of Hiwassee, Towns County, and the Georgia Department of Natural Resources. Proposals for actions on private lands should be directed to the appropriate entity.*

In general, TVA manages public land to protect and enhance natural resources, generate prosperity, and improve the quality of life in the Tennessee Valley region (see Appendix A, TVA Land Policy). TVA develops reservoir land management plans to facilitate the management of reservoir lands in its custody. TVA cannot provide reservoir land plans for private properties not under its control. TVA does cooperate with state and local planning efforts when appropriate. The allocations under Alternative C for Parcels 10, 52, and 77 on Chatuge Reservoir were made in response to requests by BRMEMC, the City of Hiwassee, and Towns County. Proposals for actions on private lands should be directed to the appropriate entity.

Visual and Aesthetic Quality

Aggregated Comment 79:

Development on Parcel 10, 52 or 77 under Alternative C would generate noise and affect the tranquility of the Chatuge Reservoir area. (Commenters: Katherine Bever, Clint Calvert, Sarah Calvert, Sandy Chapin, Thomas Bickes, Bill Bindewald, Deidre and David Fisher, Pravin Ghandi, Robert H. Graham, Bill Herold, Gary M. Kopacka, Jill Long, Helen Neiner, Petition #1, Petition #7, Hava Preye, William Edward Preye, Bill Quarte, Chris Saunders, George and Victoria Tucker)

TVA Response: *Comment noted. The potential generation of noise from the change of allocation on Parcels 10, 52, and 77 under Alternative C are described in Sections 3.1.11.2.2 and 3.2.1.2 of the FEIS. Also, specific noise issues would be addressed in a future environmental review of any proposed project.*

Aggregated Comment 80:

The area around Chatuge Reservoir is very scenic, and people are drawn to the area because of its beauty. Development of Parcels 10, 52 or 77 would change the visual character of the reservoir. Some types of development would be an eyesore. The scenic qualities of the lake would be lost if TVA allows these properties to be developed. TVA should keep Parcels 10, 52, and 77 undeveloped and in a natural state.

(Commenters: Marcia Abrams, Melinda Agee, Mr. and Mrs. C. Jon Anderson, Brenda Arnett, Cary Bainbridge, Casey Barnes, Erin Barnes, Rebecca B. Beal, Graham & Phyllis Bell, Laura Benitez, Katherine Bever, Lynne Bever, Michael Bever, Ronnie Bickley, May May Bickes, Thomas Bickes, Bill Bindewald, Robin Blair, Brian Bower, Russ Cagle, Clint Calvert, Sarah Calvert, Diane Carmichael, Tommy Carmichael, Nancy Caulder, J. Thomas Chapin, Sandy Chapin, Barbara Coffman, Bill Cogle, Michael Crowe, DonnaLee DeMuth, Ross DeMuth, Tucker DeMuth, Ophelia Dickey, Michael Donohue, Paulette Doyeir, Maria E. Duben, Janet Duke, Jim Duke, Ellen Edwards, Donn French, Robert E Garbe, Pravin Ghandi, Robert H. Graham, Max Green, David and Barbara Hansen, Eileen Hedden, John Hedges, James Hendry, Shamina Henkel, Bill Herold, Gene and Lou Hewatt, Pamela J. Hitchcock, Winona Holloway, Karen Holmes, Nancy Johnson, Joan King, Pam Kirk, Margaret M. Knight, Gary M. Kopacka, Melanie Kopp, Paul & Victoria Lajoie, Margaret Leslie, Theresa Marcucci, Steve A. Massell, Mary Miller, Cameron Milles, Carol Moffit, Jack and Suzanne Morlen, Stephen M. Morris, Rita Morrison, Jennifer Myers, Sylvia Neese, Helen Neiner, Greg Noojin, Rena Noojin, Carleton A. Ohly, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, Kim Patterson, Elva Paul, Petition #1, Petition #7, Kristin Preye, William Edward Preye, Diane Pulley, Eddie Pulley, Steve Pulley, Beverly Rambo, Robert Rambo, Donald A. Reaser, Susan J. Reaser, Lynne Reid, Faye Rogers, Thomas A. Romine, Judy Rosasco, Cheryl Russell, Margaret Arralu S. Russell, Barbara L. Russell, Golda Sanders, Stephen B. Shepherd, Steve Shlansky, Leonore and Denny Smallridge, Anton and Priscilla Stab, Gene A. Stalcup, Albert Swint, Jim Tharp, Stephen K Thompson, Patrick Turner, Becky Vashon)

TVA Response: *Potential effects to the visual character of Chatuge Reservoir resulting from the adoption of each of the alternatives, including the Blended Alternative, are described in Section 3.2.9.2 of the FEIS.*

Comment 81: “Boating is so enjoyable when watching the wild animals feed/drink at the shoreline. Further growth about the shoreline will distract from these scenes.”
(Commenter: Ed Duben)

TVA Response: *Comment noted.*

Biological Resources

Aggregated Comment 82:

Development of Parcel 10, 52 or 77 would cause the loss of forested areas that provide habitat for various plants and wildlife species. Pollution from activities on these parcels could also adversely affect plant life and wildlife. (Commenters: Thomas Bickes, Bill Bindewald, Clint Calvert, Nancy Caulder, Barbara Coffman, Maria E. Duben, Deidre and David Fisher, Donn French, Robert E. Garbe, Barbara Gibson, Robert H. Graham, Mary Griffith, Virginia D. Harbuck, Bill Herold, Karen Holmes, Gary M. Kopacka, Karen A. Kopec, Robert Kopec, Jill Long, Steve A. Massell, Mary Miller, Ellen Pease, Hava Preye, Jeff Powell, Bill Quarte, Faye Rogers, Larry and Janice Rutledge, Golda Sanders, Chris Saunders, Elizabeth Saunders, Ann T. Spalding, Judy Southern, Stanley Southern, Stephen K Thompson, George and Victoria L Tucker Jr., Jan Waldron, Edward Wesson)

TVA Response: *Potential effects on plant and animal life from development on Parcels 10, 52, and 77 resulting from the adoption of the various alternatives are described in Sections 3.2.3 and 3.2.4 of the FEIS. In addition, specific impacts to biological resources would be addressed in a future environmental review of any proposed project.*

Cultural Resources

Comment 83: “Loss of natural habitat for wildlife (including eagles, bear, deer, bats, etc.) and proven Native American cultural sites is not keeping with the TVA stewardship doctrines. Loss of scenic beauty which TVA had carefully crafted on Lake Chatuge, and replacing it with the option of commercial ventures, has no value to the community the lake serves.” (Commenter: Steve A. Massell)

TVA Response: *TVA complies with the requirements of Section 106 of the National Historic Preservation Act. Protection of cultural resources is part of TVA’s stewardship responsibility. Potential effects from allocation of parcels for particular uses were evaluated in the FEIS. Any request for use of a particular parcel is subject to TVA approval, and additional environmental review would be completed prior to a decision. Potential adverse effects to historic resources would be mitigated in accordance with Section 106.*

Water Quality

Aggregated Comment 84:

We support the findings of the TVA partially funded Lake Chatuge Watershed Action Plan (WAP), but it was not mentioned in the DEIS. Why wasn’t this plan taken into consideration when discussing the already degrading water quality issues on Chatuge Reservoir? I didn’t see anything in the WAP that suggested changing the designation of some TVA land on the lake from Zone 4 to Zone 6 would be good for the lake. At a

minimum, TVA should “overlay” the observations, conclusions and recommendations of the WAP before any requests are entertained. (Commenters: Norm Bennett, J. Thomas Chapin, Edward M. Duben, Matthew Humphreys, Richard Ludwig, Gilbert S. Nicolson, TCHA)

TVA Response: *TVA is aware of the current water quality conditions of Chatuge Reservoir and the recommendations of the “Lake Chatuge Watershed Action Plan.” TVA supports the plan’s recommendations to improve the water quality of Chatuge Reservoir. The potential effects to water quality from adopting Alternative C were presented in Section 3.2.10.2 of the DEIS. The “Lake Chatuge Watershed Action Plan” was mentioned on page 107 of the DEIS. This document was listed in the Literature Cited section, i.e., Chapter 6, of the DEIS. The plan is cited in Section 3.2.10.1 of the FEIS.*

Comment 85: “The TVA should conduct a lake wide study of shoreline erosion to identify all those areas where water disturbance is causing significant problems and to mark those areas as No Wake zones. 8. The TVA is encouraged to continue its support of the Hiwassee River Watershed Coalition and to recognize how these suggestions support the corrective actions suggested in the HRWC report of 2007.” (Commenter: TCHA)

TVA Response: *TVA regularly conducts shoreline inspections to locate areas of eroding shoreline that need attention. The establishment of no-wake zones is the responsibility of the respective state where the reservoir is located. TVA would like to continue its relationship with the Hiwassee River Watershed Coalition and similar organizations.*

Comment 86: “Lake Chatuge should be allowed the opportunity to improve the water, environmental and ecological quality - this will take years. To allow any zone change from Zone 4 to Zone 6 would not be prudent in the stewardship of the lake. These three parcels are, in fact, in the exact center of the lake and adjacent to other highly developed areas given by the TVA to the city of Hiwassee and Towns County. If the persistent downward turn continues, Lake Chatuge will indeed become a dead lake and this poor water quality will then be pumped down to other lakes on this TVA chain.” (Commenter: Jeanne Kopacka)

TVA Response: *Comment noted. Potential effects to water quality are summarized in Section 3.2.10.2 of the DEIS and FEIS.*

Aggregated Comment 87:

The runoff of sediment and fertilizers from the shoreline development, as described under Alternative C, would pollute the reservoir. Construction of parking areas will lessen the absorption rate of these sites and create additional runoff into the reservoir.

(Commenters: Territ Baker, Janet Bentley, Brian Bever, Dr. Keith Bever, Lynne Bever, Joan Bever, R. Bickley, Thomas Bickes, Bill Bindewald, Tom Bindewald, Laura Benitez, John Callen, Clint Calvert, Sarah Calvert, Diane Carmichael, Tommy Carmichael, Michael Crowe, Stephanie Donner, Maria Duben, Donn French, Robert H. Graham, Jackie Huffman, Tito Kalb, Rita Morrison, Gene and Lou Hewatt, Debra LeGere, Robert Moffit, Helen Neiner, Gilbert S. Nicolson, Petition #2, Steve Pulley, Lynne Reid, Golda Sanders, Stephen B. Shepherd, Steve Shlansky, Kimberly Tayloe, Wiley P. Thomas, Edward Wesson)

TVA Response: *Potential effects to water quality are summarized in Sections 3.1.10.2 and 3.2.10.2 of the DEIS and FEIS. Before making a decision to approve any development on planned land, TVA will complete an environmental review of the proposed land use request to determine potential environmental impacts, including effects to water quality. If land use requests are approved for any of the parcels (including Parcels 10, 52, and 77), TVA would likely require the applicant to implement construction best management practices (BMPs) to reduce potential adverse effects to local water quality.*

Comment 88: “There is so much runoff that the lake is inundated with red clay and other pollutants that hurt the water. Being a member of the Hiawassee River Watershed Coalition, the DEIS does not even mention the poor water quality that now exists in Chatuge. It is not in the DEIS study. Any new mass development with the clear cutting of trees will only exacerbate the poorest water quality of any of the TVA reservoirs. If it continues on this downward spiral it will be irreversible. That comes from scientists who work with the Watershed Coalition and is documented.” (Commenters: Ed and Ellen Moore)

TVA Response: *A summary of existing water quality conditions for Chatuge Reservoir was provided in Section 3.2.10.1 of the DEIS. Potential effects to water quality from the various alternatives were described in Section 3.2.10.2 of the DEIS. These discussions are updated in FEIS Sections 3.2.10.1 and 3.2.10.2.*

Aggregated Comment 89:

Chatuge Reservoir has poor water quality. Rather than compromising the health of the reservoir, TVA should improve water quality. The local area would benefit economically and ecologically from protecting the beauty and cleanliness of the lake. (Commenters: Dan Aiksnoras, Cary Bainbridge, Paula Brower, Tara Degeal, Karen Holmes, Ken Holmes, Jean Hamilton, Eileen Millard, Elva Paul, Phillip Paul)

TVA Response: *Comment noted. The allocations of Parcels 10, 52, and 77 under Alternative C were the result of request by BRMEMC, Towns County, and the City of Hiawassee. BRMEMC’s request regarding Parcel 10 has since been withdrawn.*

Comment 90: “Everyone, including the Hiwassee Watershed Coalition, knows that it is very difficult now to keep the lake quality clean without adding unnecessary development. The salvation of every resident, including wildlife, in this area of Lake Chatuge depends on the quality of this lake water and the beautiful views it affords.” (Commenters: Gene and Lou Hewatt)

TVA Response: *Comment noted.*

Comment 91: “TVA and its Board of Directors continue to ignore deteriorating water-quality issues at Lake Chatuge (a TVA impoundment) and the Hiawassee River Watershed, the negative impact to wildlife and endangered species due to shoreline over-development, and the loss of visual resources.” (Commenter: Matthew Humphreys)

TVA Response: *Comment noted. Potential effects to water quality are summarized in Sections 3.1.10.2 and 3.2.10.2 of the DEIS and FEIS.*

Comment 92: “I am aware of the poor and declining condition of this reservoir’s water over the last few years. The TVA’s stewardship role is the single most influential element in preventing further degradation of water quality. Rather than agreeing to further development based on the promises of local government to do in the future what they have not done in the past, the TVA should stand firm and fulfill its role as guardian of these valuable land and water resources.” (Commenter: Robert Moffit)

TVA Response: *Comment noted.*

Comment 93: “We are close to using about 2/3 of our sewer capacity from Lake Chatuge presently via the City of Hiawassee and the lake is going to the point where it’s going to become polluted if additional development is allowed around the lake. So just hold what you’ve got and don’t put anymore commercial or high-density residential development around the lake.” (Commenters: George and Virginia Colvin)

TVA Response: *TVA is not proposing any residential development. Disposal of TVA reservoir property for residential development is inconsistent with TVA’s Land Policy. We have noted your comment as it relates to commercial development around Chatuge Reservoir.*

Comment 94: “... the quality of our lake Chatuge was the greatest in the entire state. You could drink the water. It was that pure. The lake maintained an abundant amount of species of fish in great quantities. However - as the years have progressed forward - the Lake has been polluted badly by disposition of sewerage treatment runoffs thus the trout were the first to go - along with small mouth bass, white bass, spotted bass, and we no longer have the Hybrid fish. All due to pollution of our Lakes.” (Commenters: Herbert and Carolyn Gatch)

TVA Response: *Comment noted. The current water quality conditions of Chatuge Reservoir are noted in Section 3.2.10.1 of the FEIS.*

Comment 95: “I am concerned about aggravating the already ‘poor’ water quality situation because I swim in the lake near Parcel 77.” (Commenter: Janet Kowalsky)

TVA Response: *Comment noted.*

Aggregated Comment 96:

Any development on Chatuge Reservoir, especially high intensity recreation, will decrease the lake’s already poor water quality. (Commenters: Ronnie Bickley, David and Barbara Hansen, Nancy Johnson, Rebecca Kemp, Jeanne Kopacka, Matt and Hava Preye, Steve Shlansky, Patrick Turner)

TVA Response: *Comment noted. Potential effects of development on water quality in Chatuge Reservoir are discussed in Section 3.2.10.2 of the FEIS.*

Comment 97: “According to TVA DEIS language (pp 106) ‘Chatuge Reservoir is a headwater reservoir [to the Tennessee river system] has no upstream impoundments that alter flow patterns and physical and chemical characteristics of runoff. Shoreline,

industrial and commercial development on Lake Chatuge have resulted in 'poor' ecological health ratings from 1995 to 2006 (except a slight overall increase to 'fair' in 1996) (TVA data presented in Figure 3-2. Chatuge Reservoir Ecological Health Ratings, 1994-2006). It is not clear why the vertical axis on this histogram was truncated at 20 as this makes the data look less dramatic when plotted from 20 to 100." (Commenter: J. Thomas Chapin)

TVA Response: *The vertical axes of the histograms presented as Figures 3-2 through 3-8 in the FEIS are now plotted from 0 to 100. Potential water quality-related effects anticipated under the alternatives are provided in Section 3.2.10.2.*

Comment 98: "Also the pollution of our water that we drink caused by fertilizers. Our lake is polluted enough. It is our drinking water for Heaven's sake!" (Commenter: Karen A. Kopec)

TVA Response: *Comment noted.*

Aggregated Comment 99:

According to TVA's report, Chatuge Reservoir's water quality rating has been poor for 9 out of the last 10 years. Any development on the lake would continue to degrade the already poor water quality. (Commenters: Sandy Chapin, Robert E. Garbe, Ed Gibson, Glenda Giles, Karen Holmes, Deborah Kalish, Pam Kirk, Joan King, Margaret Leslie, Cameron Milles, Petition #1, Petition #7, Susan Rothblum)

TVA Response: *Comment noted. Potential effects to the water quality of Chatuge Reservoir are described in Section 3.1.10.2 and 3.2.10.2 of the DEIS and the FEIS.*

Comment 100: "I have watched Lake Chatuge change as development has increased on the lake for the past 18 years. The water quality has decreased visually. Guests to my home must use alcohol to clean their ear canals due to 'swimmer's ear'. The fish population has diminished and of those that are caught, they are often deformed in their fin and scale patterns and we are no longer willing to eat them as they do not appear healthy. This was not the case just eight to ten years ago when there was a plentiful catch of multiple types of healthy fish. Of course, development is going to occur over the years. However, Lake Chatuge is the FIRST POLLUTER in this TVA chain of lakes. It is 75% developed, and has had poor water quality readings for the past 8 years. The city of Hiawasse and Towns County has been given parcels of land to steward during this time. What I have seen is irresponsible overdevelopment, erosion of lakefront, ill-provided trash control and runoff. Unsightly items on the shoreline have increased the erosion. Pumping of sewage into the lake has increased as the population and usage of the lake has increased. No conservation measures to protect the water quality and ecology of the lake itself have been enacted. The local politics of these parcel developments have driven the poor long term oversight, allowed pollution of the boundry/shoreline waters, and caused inconsiderate care of the surrounding environment, and overuse." (Commenter: Jeanne Kopacka)

TVA Response: *Comment noted. If deformed fish are caught fairly often, they should be given to TVA or to the appropriate state agencies so they can look into the matter. TVA cannot control development or the quality of management of land it does not own. When TVA gives approval for development on its lands,*

TVA ordinarily requires the use of best management practices to reduce impacts to water quality.

Comment 101: “The Hiawassee River Watershed Coalition and others who want to protect the health of the lake oppose greater development on and near the lake. The quality of our water and the fish that people eat from this lake are in poor condition. The striped bass from Lake Chatuge, according to the State of Georgia, should not be eaten by pregnant women or children and should be limited by others to be eaten no more than once/wk. There has been poor oversight on this lake, and when trees are taken down and grass grown in their place, the runoff of fertilizers and other substances is creating more dangerous lake health conditions.” (Commenter: Ellen Pease)

TVA Response: *Comment noted. Current water quality and aquatic ecology conditions in Chatuge Reservoir are noted in Section 3.2.10.1 of the DEIS and FEIS. When TVA gives approval for development on its lands, TVA ordinarily requires the use of best management practices to reduce impacts to water quality.*

Comment 102: “The shoreline and riparian buffer on Chatuge Woods (Parcel 13), Towns County Park (Parcel 28), Towns County Multipurpose Center (Parcel 63) have not been adequately maintained, boats are allowed to pull up on shore adding more sediment to the lake. All this is documented in the DEIS Summary of Public Participation Appendix B, pp 294-296 and 308-309. To emphasize the degradation of the TVA land parcels, I have attached photos of these conditions. Instead of maintaining the buffer along the lake, Towns County cut down trees at the Community Center and put in picnic tables. This is now an eyesore from the lake and creates a condition that excessive runoff of sediment, fertilizers and petroleum oils (from parking and hardscape surfaces) enter the lake. This has helped to substantially degrade the water quality of Lake Chatuge (see water quality below).” (Commenter: J. Thomas Chapin)

TVA Response: *Comment noted.*

Comment 103: “The State just turns a blind eye to the seriousness of the water source that they so adequately say they're trying to protect, but they don't. I've personally gone through a fish farm that a neighbor built in behind -- the home behind me on the mountain. It killed about a million dollars worth of operation in fish. The State wouldn't come out. The State DNR and EPD would never even return my call. The Department of Ag -- when I finally complained enough, the Department of Agriculture showed up and said, yeah, those are dead fish and it does smell like raw sewage in here, have a nice life, you've got a lawsuit. So why would we want to continue to sell off or give off more of this land to create -- the generations to come are going to be paying a dear price. If you let your child swim in any of those lakes and they come down with ear infections or other infections -- well, let me give you another example. In the swimming pool industry, which I deal a lot with in water purification because I manufacture ultraviolet light for sterilizing pathogens in water and air, the State comes in and says the e-coli count in this swimming pool is too high. They'll find that, yet they'll let the e-coli count in the lake get well beyond any reasonable amount and do nothing about it. They'll continue to allow growth to come in.” (Commenter: Roy Underwood)

TVA Response: *Comment noted.*

Comment 104: “As stewards of the reservoir lakes under the TVA guardianship, how is it conceivable that the TVA could entertain the idea of further development on Lake Chatuge when the water quality is so poor already?” (Commenter: Jeanne Minichiello)

TVA Response: *The allocation of Parcels 10, 52, and 77 on Chatuge Reservoir for development-related uses under Alternative C were made in response to requests received during the scoping period. The potential effects to water quality in Chatuge Reservoir from these proposed allocations are described in Section 3.1.10.2 and 3.2.10.2 of the DEIS and FEIS. Should Alternative C be adopted, TVA would subject land use requests for these three parcels to additional environmental review prior to granting or denying approval for that use.*

Comment 105: “To consider establishing manufacturing facilities, and the resultant pollutants, on a property that fronts a natural resource that serves as a public source of drinking water and recreation is frankly unbelievable. According to TVA's own measurements of the health of Chatuge over the last 10 years, it has been in decline. I guess that efforts by TVA to assist the public with reversing these trends go out the window in favor of short-term financial gain. So much for the balanced approach outlined in TVA's revised operating procedures from a few years back. What happened to those stated objectives that were clearly communicated to the public?” (Commenter: Doug Hadaway)

TVA Response: *The allocation of Parcel 10 to Zone 5 (Industrial) under Alternative C was done in response to a request from BRMEMC to facilitate a water intake. No manufacturing facilities were proposed on the tract. BRMEMC has since withdrawn the request, and TVA has developed Alternative D (the Blended Alternative). Under Alternative B and the Blended Alternative, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 106: “Water Quality and Aquatic Ecology: Increased use, both people and industrial, would reduce the current forest cover with its natural ecological recovery system, and replace that forest with new roads for access and usage, while burdening the lake and shoreline with required plumbing, sewerage, drinking water, run-off, compacting and litter.” (Commenters: Cameron Milles, Karen Holmes, Robert E. Garbe, Petition #1, Petition #7, Cheryl Russell)

TVA Response: *Comment noted.*

Aggregated Comment 107:

Water quality in Chatuge Reservoir is already poor. About 75 percent of the shoreline available for residential development is already built out. Additional shoreline development would further degrade water quality. (Commenters: Cheryl Russell, Michael Bever, Terri Bever, Dr. Keith Bever, Jackie Huffman, Joan Bever, Tito Kalb, Kimberly Tayloe, John Callen, Stephanie Donner)

TVA Response: *As shown in Table 1-2, TVA controls only a portion of the shoreline of Chatuge Reservoir. Under Alternative C, three parcels would be allocated for potential development-oriented uses. Prior to approval of specific uses on these parcels, TVA would complete environmental review. Appropriate mitigative measures to reduce potential effects to water quality would likely be imposed as conditions of approval, should TVA decide to approve the requests.*

TVA has no authority to control development, including residential development, on those shoreline lands it does not control or on back-lying properties adjoining the shoreline.

Comment 108: “We don’t need fertilizers, etc. to make it a dead lake.” (Commenter: Karen A. Kopec)

TVA Response: *Comment noted.*

Comment 109: “Changing the use to anything but undisturbed vegetation will cause run-off & pollution into the waters of the reservoir. The use of herbicides, pesticides and fertilizers will cause further deterioration of the water quality of the reservoir.” (Commenter: Bill Herold)

TVA Response: *Comment noted.*

Comment 110: “Approximately 30% of the nutrient load on the lake could be removed simply by pumping the effluent through a constructed wetland. I have brought this to the attention of the Towns County Commissioner who did not seem very interested in pursuing this. The Town of Hiawassee does not seem interested in pursuing this. Meanwhile, the TVA continues to register poor quality of our water. Perhaps something could be done about pumping the sewage effluent through a constructed wetland or through a tertiary treatment plan. If I can assist you in any way, please do not hesitate to contact me. Attached to this comment was a study about the nutrient loading to the reservoir from the STP, It has been passed on to the Watershed Team and the Water Quality reviewer - Tyler Baker.” (Commenter: Peter F. Merkle)

TVA Response: *Comment noted.*

Comment 111: “It is very apparent that any new development, recreational or industrial, will further add to the deterioration and ‘poorer’ quality of the lake. The county has just taken a stand on limiting the height of buildings in this beautiful area of the mountains and we feel TVA should take a stand to help keep the lake and lake property in a clean and environmentally sounds condition. This includes, but not limited to, water quality and wildlife habitats that surround the lake.” (Commenters: Gene and Lou Hewatt)

TVA Response: *Comment noted.*

Comment 112: “Chart 3-15 (MRLMP page 107) shows that the water quality in the Chatuge Reservoir since 1993 (3 goods, 3 fairs, 0 poors) compared to 2006 (0 goods, 2 fairs, 4 poors) has deteriorated. TVA (among others) has assisted the Hiawassee River Watershed Coalition in developing a plan to improve the water quality of the Chatuge Reservoir. The plan is documented as the ‘Lake Chatuge Watershed Action Plan March 2007.’ MRLMP page S7 states that the overall ecological health is poor for the Chatuge Reservoir. I am confused. Why does TVA want to rezone TVA land, land remaining in public ownership, for industrial use which may eventually have a negative impact on water quality? Why is TVA willing to jeopardize the chances for improving the water quality? I haven’t been able to find out what classification TVA has after poor, but one may be needed for the Chatuge Reservoir in the near future.” (Commenters: Mr. and Mrs. Henry Badach)

TVA Response: *As stated in the DEIS, allocations of three parcels on Chatuge Reservoir to more development-oriented zones were made in response to requests from BRMEMC, Towns County, the City of Hiawassee, and the Georgia Department of Natural Resources. Prior to approval of actual use of these parcels, TVA would perform additional environmental review. Appropriate best management practices to prevent runoff, sedimentation, and on-site erosion would likely be imposed as conditions of the agreement for the proposed use. "Poor" is the lowest category of water quality used by TVA.*

Comment 113: "How about a 'storm water pollution prevention plan' for the site. Obviously this would include all potential discharges from the site including parking lot drainage, runoff from grassy area, etc. Also, because the site will be used as a sports complex, it could be viewed as an industrial site where the storm water plans are more stringent. 3. It will require necessary Corps of Engineers Permits, specifically the site will have to meet stream buffer requirements." (Commenter: E. B. and Nancy Pulley)

TVA Response: *Requests for use of Parcel 10, 52, 52a, or 77 would be subject to approval by TVA, and TVA would perform additional environmental review on any proposals received. Depending on the particular characteristics of the facilities ultimately proposed on Parcel 10, 52, 52a, or 77, various environmental requirements (such as the preparation of a Storm Water Pollution Prevention Plan) and permits may be required.*

Comment 114: "I own a cabin on lake Chatuge (purchased in 1997). There has been constant development and building around the lake since we bought our place. The water quality or purity of the lake has fallen off seriously if the TVA reports are accurate!" (Commenter: Wiley P. Thomas)

TVA Response: *Comment noted.*

Comment 115: "Lake Chatuge is now 'Polluted'. There is a limit as to eatable fish. I can't imagine the results of more fertilizer/insecticides than would leach into the lake. Let's use this pearl to attract visitors, not have them driven away due to all types of pollution and have water that is unswimable." (Commenter: Ed Duben)

TVA Response: *Comment noted.*

Comment 116: "Lake Chatuge watershed plan shows that in 2001 the lake water testing was of good quality. Since that time, test results have been graded as poor, due to run off and increased construction. Lake Chatuge is 75% developed. In order to stop the clock for further water deterioration to the point of a irreversible condition a moratorium on all development must be put in place. If this is not done, the lake will be dead in 5 years. Presently, the stench of the water being ejected out of the electrical turbine at the bottom of the dam is already offensive. If we continue in the development process, Lake Chatuge will no longer be as it is today and the area could be abandoned by those who truly love this lake. As a caring resident and a good steward of the land and lake, it falls as our duty to advise TVA of our concerns of this possible developing catastrophic situation. I must say once again, that this lake is POLLUTED, certain fishing is restricted, and it is the most contaminated of the lakes within your area of responsibility. We must have more time to study this dire situation and judge the direction that we have to establish for the benefit of everyone." (Commenter: Maria Duben)

TVA Response: *Comment noted. Potential effects on water quality in Chatuge Reservoir under the alternatives are described in Section 3.2.10.2 of the FEIS. Prior to approval of actual use of any parcels, TVA would perform additional environmental review. Appropriate best management practices to prevent runoff, sedimentation, and on-site erosion would likely be imposed as conditions of the agreement for the proposed use. TVA cannot control development on land it does not manage.*

Comment 117: “In addition, some property owners are making beaches near the 1926 elevation line by hauling in tons of sand each year, a clear violation of TVA regulations. Yet nothing is being done to prevent these violations. TCHA has members who have complained to TVA and TVA’s response has been that it is the county’s responsibility to enforce sedimentation issues. One member states that he has seen at least 2 loads of sand, 5 tons each, dumped below the 1933 elevation line in one year. Most of this loose sand will wash into the lake within a year. The problem is that all this sand along with other sedimentation is rapidly displacing water, not a desirable feature of properly managing a lake. It is highly unlikely that you will find these examples of management in the Private Investor Owned Electric Utility Industry where the utilities have a fiduciary responsibility to shareholders, customers and State Public Utility Commissions. It is time for TVA to take control and properly manage its assets.” (Commenter: TCHA)

TVA Response: *Placement of fill material is subject to approval by TVA under Section 26a of the TVA Act.*

Comment 118: “Shoreline erosion is rapidly increasing with the increased boat traffic. Please, no new industrial development on Lake Chatuge.” (Commenter: Tony R. Branam)

TVA Response: *Comment noted.*

Comment 119: “The water quality is suffering already.” (Commenter: Maria E. Duben)

TVA Response: *Comment noted.*

Comment 120: “Water Quality and Aquatic Ecology: This would be to the detriment of the water quality of the lake. There are already campgrounds across from that area and would accelerate runoff of sediment, fertilizers and motor oils from developed land. We believe that a lot of work is still to be done to try to clean up the lake because of its low water quality rating.” (Commenters: Larry and Janice Rutledge)

TVA Response: *Comment noted.*

Comment 121: “Water runoff with the potential loss of watershed foliage, including old growth trees of 100+ years. Other water issues of access, waste and septic/sewage capacity. Potential shoreline issues.” (Commenters: Jill Long, Elizabeth Saunders, Deidre and David Fisher, Bill Quarte, Chris Saunders, George and Victoria L Tucker Jr.)

TVA Response: *Comment noted.*

Comment 122: “We have implemented a 50 ft set back on all waterfront property and to over-ride this rule would set a dangerous precedence in regards to various other

waterfront properties. Already the quality of our drinking water, drawn from Lake Chatuge, is endangered.” (Commenter: Jo-Ann R. Dedmon)

TVA Response: *TVA is not proposing to override a 50-foot setback on waterfront property under any of the alternatives presented in the DEIS or the FEIS. Any such setback, however, would not be applicable on TVA-managed lands.*

Comment 123: “What about water quality?” (Commenter: Kristin Preye)

TVA Response: *See Section 3.2.10 of the DEIS and FEIS.*

Comment 124: “Please don’t give Parcel 77 to Towns County. They are already polluting our lake with the Georgia Mtn. Fairgrounds. It is true that during the Fairs, sewage goes right into the lake? Why does Lake Chatuge have the worst water quality of all TVA lakes?” (Commenter: Karen A. Kopec)

TVA Response: *This is not true. The Georgia Mountain Fairgrounds is provided with water and sewer service by the City of Hiwassee. Water quality in Chatuge Reservoir is described in Section 3.2.10.2 of the EIS.*

Comment 125: “I am also concerned about the water quality. What about soil erosion associated with recreational or industrial development? What about a lack of woody vegetation to filter runoff? What about the application of fertilizers on sports fields?” (Commenter: Claudia Goldberg)

TVA Response: *Potential effects to water quality under the alternatives are described in Section 3.2.10.2 of the DEIS and FEIS.*

Vehicular Traffic

Aggregated Comment 126:

Any development of Parcels 10, 52, and 77 will lead to an increase in traffic on and around Chatuge Reservoir. (Commenters: Max Green, Mary Miller, Petition #1, Petition #7, Judy Southern)

TVA Response: *An increase in vehicular traffic is a logical consequence of additional development.*

Socioeconomics

Comment 127: “Lake front property is our economic engine and TVA and the EMC should not be allowed to jeopardize our lake.” (Commenter: Elizabeth H. Ruf)

TVA Response: *Chatuge Reservoir and the adjacent lands subject to the land management plan described in the FEIS are owned by the United States of America and are entrusted to the Tennessee Valley Authority. Portions of the shoreline property on Chatuge are privately owned. The purpose of the EIS is to identify and disclose to the public the potential environmental effects of developing a plan for future management of the subject properties. Potential*

socioeconomic effects under the alternatives are described in Section 3.2.12.2 of the FEIS.

Comment 128: “I have read, with great interest, and great sadness, your proposals for use of TVA land on Lake Chatuge, specifically land development destruction of ‘Green Space’. If for no other reason, wouldn't it be better for our future generations to preserve what Green space we have than to develop it without regard for the impact on the environment and beauty of this place. Progress at what expense? Are their jobs to be justified in all of these proposals?” (Commenter: Barbara Coffman)

TVA Response: *The proposed allocation changes of Parcels 10, 52, and 77 on Chatuge Reservoir, as well as Parcels 34 and 49 on Hiwassee Reservoir, were developed in response to requests for such changes by local governments, conservation organizations, and BRMEMC. TVA has examined the potential impacts of these allocations on the environment in the FEIS. If TVA receives requests for specific uses of these parcels, TVA will conduct additional environmental review before approving such requests. TVA did not propose the allocations under Alternative C or any of the alternatives considered specifically for the purpose of economic development. The goals of developing the MRLMP were described in Section 1.2 of the DEIS.*

Aggregated Comment 129:

The scenic quality of the area around Chatuge Reservoir is a major economic factor for this area. Development of shoreline (i.e., Parcel 10, 52, or 77) would adversely affect the overall economy of the area. (Commenters: Mr. and Mrs. C. Jon Anderson, Cary Bainbridge, Cathy Barton, Janet Bentley, Katherine Bever, Michael Bever, J. Thomas Chapin, Sandy Chapin, Robert E. Garbe, Pravin Ghandi, Ed Gibson, Glenda Giles, Claudia Goldberg, Karen Holmes, Gary M. Kopacka, Paul and Victoria Lajoie, Richard Ludwig, Cameron Milles, Petition #1, Petition #2, Petition #7, Bill Preye, William Edward Preye, Matt and Hava Preye, Faye Rogers, Michael Rogers, Cheryl Russell, Stephen B. Shepherd)

TVA Response: *Potential socioeconomic effects associated with the adoption of Alternative C are provided in Section 3.2.12.2 of the FEIS.*

Aggregated Comment 130:

Development on Chatuge Reservoir would cause conditions that would lead to decreased property values in the area. (Commenters: Brian Bever, Laura Benitez, Ronnie Bickley, David and Barbara Hansen, Nancy Johnson, Kristin Preye, Susan Rothblum, Unknown)

TVA Response: *Comment noted. Potential effects to the local economy, including a potential decrease in local property values, are described in Section 3.2.12.2 of the FEIS.*

Aggregated Comment 131:

Lakefront development on Parcels 10, 52, and 77 will change the visual character of the area and cause pollution. Consequently, the area will be less attractive to tourists, and income from tourism will decline. (Commenters: Catherine Carew-Bednarski, Lynne Bever, Michael Crowe, Michael Derby, Maria Duben, Ed Gibson, John Hedges, Bill

Herold, Pamela J. Hitchcock, Debra LeGere, Penny W. Loftin, Robert Moffit, Kristin Preye, Susan Rothblum, Jim Tharp, Patrick Turner)

TVA Response: *The potential economic effects to the Chatuge Reservoir area, including the potential loss of tourism, are addressed in Section 3.2.12.2 of the FEIS.*

Aggregated Comment 132:

Development on Parcel 10, 52 or 77 resulting from TVA's adoption of Alternative C could lower local property values, which would result in a decline in local tax revenues.

(Commenters: Territ Baker, Dr. Keith Bever, Joan Bever, Katherine Bever, John Callen, Diane Carmichael, Tommy Carmichael, Stephanie Donner, David and Barbara Hansen, Jackie Huffman, Tito Kalb, Kristin Preye, Kimberly Tayloe)

TVA Response: *Comment noted. Potential effects to the local economy are described in Section 3.2.12.2 of the FEIS.*

Air Quality

Aggregated Comment 133:

Lakefront development associated with the proposed allocation changes under Alternative C would have a negative impact on the air quality in the area. (Commenters: Donn French, Robert H. Graham, Gary M. Kopacka, Carol Moffit, Rita Morrison, Petition #1, Petition #7 Lynne Reid, Golda Sanders)

TVA Response: *Potential air quality effects from development resulting from TVA's adoption of Alternative C are described in Section 3.2.11.2 of the FEIS.*

Boating

Comment 134: "A change will likely have a negative impact on water quality, further shoreline erosion, noise, air pollution, and even personal safety for boaters."
(Commenter: William B. Johnson, Nancy Johnson, Petition #2, Maureen Thompson)

TVA Response: *Comment noted.*

Comment 135: "In addition, many renters of pontoon boats and personal watercraft often have never operated either and have no safety training. They have no respect for or knowledge of the 100 ft no-wake law in Georgia nor of other water safety and courtesy rules. Commercial enterprises that lease boats and PWCs should be required to review applicable boating regulations with renters before they take possession of the boat or PWC. Special emphasis should be given to the 100 ft. no-wake zone near docks and anchored boats. In turn, the renters should be required to carry with them a certificate certifying the receipt of this required safety and operating procedures briefing. Property owners report that the wakes are so bad at times that you simply cannot stand up or walk safely on their docks. The water quickly becomes extremely muddy and unusable. Boat traffic should be restricted to the center portion of all the narrow creeks and coves with reduced speeds and these should be marked as such. Two of our members report that they spent over \$500.00 to purchase US Coast Guard approved NO WAKE and SWIM AREA buoys and properly secured and installed them. The NO

WAKE buoy actually helped keep water traffic away from their boat docks. After two years the Georgia Department of Natural Resources made them remove the NO WAKE buoy because they didn't have the resources to enforce the NO WAKE Law except at bridges. This is a poor excuse to property owners who volunteer to utilize their own resources to assist in the enforcement of laws that improve safety and reduce some sedimentation from shore line erosion! And we have other examples of dock owners placing 'No Wake signs on their docks and having them also be effective." (Commenter: TCHA)

TVA Response: *TVA does not exercise jurisdiction over boating regulations. Whether to require rental agencies to review relevant boating regulations with renters of boats and watercraft is a decision for local governments that enact the regulations.*

Comment 136: "The TVA should require that all renters of watercraft on Lake Chatuge provide their customers with a safety and courtesy briefing and with certification that this briefing has been received." (Commenter: TCHA)

TVA Response: *TVA does not exercise jurisdiction over boating regulations in Georgia. Whether to require rental agencies to review relevant boating regulations with their customers is a decision for the state and local governments that enact the regulations. In any event, TVA cannot subject rental entities not operating on TVA-managed land to any requirements.*

Aggregated Comment 137:

Chatuge Reservoir is crowded with boats. TVA should do something about this situation. (Commenters: Ronnie Bickley, TCHA)

TVA Response: *TVA does not have regulations or restrictions on the number or size of boats that may be used on Chatuge Reservoir. TVA does not have jurisdiction over boating in Georgia. The Georgia Department of Natural Resources is responsible for issuing and enforcing boating regulations in Georgia.*

Comment 138: "Permission for the installation of additional boat launching ramps should be withdrawn at least until effective traffic control on the lake can be established and proven to be working. 3. A major and immediate effort should be initiated by TVA in conjunction with local law enforcement and the DNR to establish traffic and procedural control over watercraft use on the lake. Police patrols with enough staff to effectively cover the entire lake should be present on all weekends and holidays and periodically during the warm weather weeks of high use. 4. The TVA should institute a program of low speed-no wake zones in the narrow coves and creeks of the lake. 5. The TVA should make enforcement of the 100 foot no wake zone near docks and anchored boats a priority." (Commenter: TCHA)

TVA Response: *TVA does not exercise jurisdiction over boating regulations and does not place restrictions on the number of boats on Chatuge Reservoir.*

Recreation

Comment 139: "I think we need a park." (Commenter: Kirsten Ledford)

TVA Response: *Comment noted.*

Comments on Chatuge Parcel 10

General

Comment 140: “Any conversion to industrial land use would have a long-term, if not permanent, negative impact. TVA states that the intent of the proposed land use plan is to ‘guide the use of the lands for the next 10-year period.’ As TVA admits, however, ‘commitments of the shoreline to industrial...development are essentially long-term decisions that would decrease the productivity of land for agricultural, forest, wildlife, and other natural resources management.’ Draft EIS at 244.” (Commenter: Gary Sheehan)

TVA Response: *Comment noted. The allocation of a parcel for a particular potential use does not necessarily constitute a commitment of that parcel to that use. If a request for a specific use of TVA-managed land is submitted, TVA will compare the requested use with the parcel’s allocation to determine whether the requested use is appropriate. If the request is approved, the term of use could exceed 10 years. Prior to approval, TVA would conduct an environmental review of the request, which would evaluate the effect of the proposed use on various resources.*

Comment 141: “Sirs, email is circulating regarding the re-zoning of parcel 10 on Lake Chatuge. I wanted to info you that I am in total support for any and all plans the TVA might have for the lake. Good luck and God’s speed.” (Commenter: John Hitselberger)

TVA Response: *Comment noted.*

Aggregated Comment 142:

Why has TVA not canceled plans to rezone Parcel 10 since BRMEMC has withdrawn the request for industrial use? (Commenters: Mr. and Mrs. Henry Badach, Henry Rodriquez, Charles K. Kraus (TCHA))

TVA Response: *In the process of preparing the DEIS, TVA developed three alternatives for consideration: Alternative A (No Action), Alternative B (Proposed Land Use Plan), and Alternative C (Proposed Modified Land Use Plan). These alternatives were described in Section 2.2 of the DEIS. Alternative C involved the allocation of three parcels of Chatuge Reservoir property (i.e., Parcel 10, Parcel 52, and Parcel 77) to more development-oriented uses. Before the FEIS was issued, BRMEMC notified TVA to withdraw its request that Parcel 10 be allocated to Zone 5 (Industrial). TVA chose not to eliminate Alternative C from consideration in the FEIS. Instead, because of this development and based on comments from the public, TVA developed the preferred Alternative D (the Blended Alternative), under which Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation). The potential environmental effects of adopting the Blended Alternative, as well as those likely to result from adopting each of the other alternatives, are described in the FEIS.*

Comment 143: “I understand that some companies need a ready water source, but I firmly believe Lake Chatuge shouldn’t be that source. Surely there are other water sources that would impact the area far less.” (Commenter: Elizabeth Holland)

TVA Response: *Other sources of water for local industry are available. These include groundwater, which would involve drilling wells, and the use of a local municipal water system. For an industry seeking to locate in the area of Chatuge Reservoir, the economic feasibility of these sources as well as using lake water would depend on various factors, such as volume required, potability, etc.*

Comment 144: "Why not setup a TVA-sponsored 'Conservation Center' on the property instead? If the sale is purely for financial generation, I might suggest you open conservations with the Trust for Public Land and/or other conservation groups, to see if they would like to acquire and thus preserve this beauty for generations to enjoy."
(Commenter: Steve A. and Krista L. Massell)

TVA Response: *Comment noted. The allocation of Parcel 10 for industrial use in Alternative C was in response to a request from BRMEMC. BRMEMC has since withdrawn the request. Under TVA's preferred Alternative D (see Section 2.3.4 in the FEIS), Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 145: "The Draft EIS acknowledges that conversion of Parcel 10 to industrial use would: Eliminate and/or have a direct negative impact on the current old-growth forest, 'a rare community type and high-quality habitat for wildlife.' Draft EIS at S-5, 95. The Draft EIS also notes that any remaining forest at the parcel would be more vulnerable to the introduction of invasive plant species, which would contribute to the degradation of plant diversity and wildlife habitat." (Commenter: Gary Sheehan)

TVA Response: *Comment noted.*

Aggregated Comment 146:

How can TVA evaluate the environmental impacts of an industry on Parcel 10 when the type of industry is not known? How much water will be withdrawn? How much wastewater will be generated? There is no sewer system on the parcel. The increase in impervious surface will cause increased runoff, including oil from parked vehicles. This will cause water pollution. (Commenters: Norris Broyles, III, James H. and Judy T. Burrell, Charlie Schobel, Colleen Thompson)

TVA Response: *The allocation of Parcel 10 to Zone 5 (industrial) under Alternative C was in response to a request from BRMEMC. BRMEMC has since withdrawn that request. Under Alternative B and the preferred Alternative D, the allocation of Parcel 10 would be Zone 4 (Natural Resource Conservation).*

TVA does not know what type of industry, if any, would locate on Parcel 10 should it be allocated to industrial use under Alternative C. During the preparation of the DEIS, TVA assumed that an industry could eventually locate on Parcel 10 and described the potential water quality impacts that might occur under such a scenario. Use of Parcel 10 by an industry would be subject to TVA approval. TVA would require detailed plans and descriptions of the proposed on-site actions prior to considering a land use request on Parcel 10. Additionally, TVA would conduct an environmental review prior to making a decision on approving or denying the request.

Aggregated Comment 147:

A more appropriate use for Parcel 10 would be residential development. (Commenters: John Goddard, John Miller, Brenda Strickland)

TVA Response: *The transfer of TVA lakefront property for the purpose of residential development is inconsistent with TVA's Land Policy.*

Comment 148: "I am assuming this decision for Parcel 10 is driven more by political and financial reasons than a legitimate land use policy." (Commenter: Ed DePrimo)

TVA Response: *The proposed allocation of Parcel 10 for industrial use was in response to a request by BRMEMC for water access. BRMEMC has since withdrawn the request. Under Alternative D, the preferred alternative, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).*

Oppose the Proposed Allocation

Aggregated Comment 149:

Do not allow development of Parcel 10; do not allocate Parcel 10 to Zone 5. (Commenters: Cene P. Kaplon, Carol Maloof, Ann T. Spalding)

TVA Response: *Comment noted.*

Comment 150: "It has come to my attention that the TVA may be considering a zoning change to a parcel of land on Lake Chatuge in the Woods Creek Cove area, designated as Parcel 10 in the TVA Draft Environmental Impact Statement. This zoning change would allow for the development of light industry or manufacturing on the 27 acre site. I have visited a private home on Lake Chatuge which overlooks that parcel several times over the past decade. The land is pristine old-growth forest. It would be Criminal (in my opinion) to allow the possibility of commercial development to destroy its natural beauty by changing the existing zoning. The only possible reason imaginable to even contemplate changing the zoning on that parcel of land is rooted in Greed, thinly masked as Economic Development. Any and all discussion points advocating for the zoning change can be traced to that motivating factor: Greed. Dress it up in whatever language you wish, someone will make money. Will you allow Greed to prevail over the preservation of Mother Earth?" (Commenter: Ann T. Spalding)

TVA Response: *Chatuge Parcel 10 would be allocated for industrial development under Alternative C in response to a request by BRMEMC for water access. BRMEMC has since withdrawn the request, and Parcel 10 is allocated to Zone 4 (Natural Resource Conservation) in TVA's preferred Alternative D. Sections 3.2.3, 3.2.4, and 3.7.9 of the FEIS acknowledge the adverse impacts to the old-growth forest on Parcel 10 that could result from its industrial development.*

Comment 151: "The TVA wants to designate Lake Chatuge Parcel 10 (lakefront property) for Industrial use. TVA examples of Industrial use include pulpwood, sand, gravel barges and trucks, light manufacturing activities, and other businesses. Yet the TVA states in this DEIS that it is the TVA's policy 'to preserve reservoir lands...except in those rare instances when the benefits to the public will be so significant that transferring the land is justified.'" (Commenter: Brendan and Joan Neville)

TVA Response: *As part of the NEPA process, TVA developed a set of reasonable alternatives that dealt with the allocation of the various parcels on the mountain reservoirs. Under Alternative A (the No Action Alternative), Alternative B (the Proposed Land Use Plan Alternative), and the preferred Alternative D (the Blended Alternative), Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation). Under Alternative C (the Proposed Modified Land Use Plan), Parcel 10 would be placed in Zone 5 (Industrial). This allocation for industrial use was made in response to a request by BRMEMC for industrial water access. At the time of the BRMEMC request, TVA was not aware of any immediate plans for industrial development of the parcel. Because of the legitimacy of BRMEMC's request, it was considered by TVA. BRMEMC has since withdrawn the request. Allocation of Parcel 10 to industrial does not necessarily mean that TVA would sell the parcel for that purpose. If Alternative C were adopted, any request for the sale of Parcel 10 would be evaluated for its compliance with the TVA Land Policy and for its potential impacts on the environment. Instead of selling the parcel, TVA could allow the parcel to be used under a lease or an easement.*

Comment 152: "As a Clay County native and a property owner right across from Parcel 10, I strongly object to any rezoning of that property. I think it should be kept as a natural preserve. Years ago when TVA was selling land to property owners, it was in a clause that said that that particular property would never be sold, it would always be left as a natural preserve for animals, no one would be able to buy it. My grandfather, Holt McClure, tried to buy it for \$2,000 from them at that time. He was not allowed to and was told it would never be sold by TVA. Evidently there was a tiny clause in there that they've changed or added and they are trying to rezone it now. I strongly object to any kind of industrial park. I just feel like it needs to be kept in its natural habitat for the wildlife and for the bald eagles that we have down there and all the other animals and just for its beauty if nothing else." (Commenter: Linda B. McClure)

TVA Response: *As stated in FEIS Section 3.2.1.1, TVA acquired 3,557 acres of land for Chatuge Reservoir. TVA sold approximately 629 acres. Another 1,161 acres have been transferred to state or federal agencies for public use. The reason that TVA would not sell property to Mr. McClure cannot be determined. Nevertheless, TVA is authorized to sell or transfer property under certain circumstances; alternately, TVA could retain fee ownership of the property and permit use thereon through a lease or an easement. The allocation of Parcel 10 to industrial use for a water intake was based on a request from BRMEMC. That request has since been withdrawn, and TVA has received no other requests for any industrial uses of this parcel. TVA has subsequently developed the preferred Alternative D, under which Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 153: "I contacted the TVA many years ago and inquired about the future and the forestry, I was informed the protected forestry would always be protected forestry. Now the TVA is considering trading a finite natural resource for an industrial plant. The decision is irrevocable and the precedent this would set is dangerous. This would be the first step in destroying Hiwassee as we know it. I hope others with more knowledge than I expand on the environmental harm this would cause." (Commenter: Jim Tharp)

TVA Response: *The proposed allocation of Parcel 10 on Chatuge Reservoir to industrial use under Alternative C was in response to a request by BRMEMC. The industrial allocation of this parcel would facilitate the installation of a water intake that would serve the nearby industrial park. No manufacturing facilities or industrial plants were proposed by BRMEMC. BRMEMC has since withdrawn the request. Under Alternatives A, B, and D, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation), which is consistent with its current land use. If TVA were to select Alternative C, TVA would conduct an environmental review of any specific requests received for industrial use of the property.*

Comment 154: “In the past the TVA has worked hard and has done everything possible to protect and preserve this beautiful lake, and they are to be commended for surveys and input for the quality of life and economic impact that this lake has for this region. I am very fortunate to be a homeowner and property owner on Lake Chatuge, and will do anything I can support the preservation of this lake in its current state. This lake, as small as it is, cannot withstand this environmental pressure from the change to Industrial zoning. Please review and help preserve Lake Chatuge and the Region.” (Commenter: Lt. Col. Gene Moss)

TVA Response: *Comment noted. The allocation of Parcel 10 was proposed in response to a request by BRMEMC for water access. BRMEMC has since withdrawn the request. Under the preferred Alternative D, no parcels on Chatuge Reservoir would be allocated to Zone 5 (Industrial).*

Comment 155: “TVA has been in control of this parcel and most of the vacant land on the lake and has done an excellent job with their land management. Local government has not! Not near as stable. I understand land management and zoning. I am a real estate appraiser and have done work for TVA. Industrial use is not the highest and best use of this parcel and never will be. Please continue your land management with highest and best use as your main goal.” (Commenter: Thomas B. Nichols)

TVA Response: *Comment noted.*

Comment 156: “TVA shall consider disposing of reservoir lands or land rights for industrial purposes or other businesses if the TVA property is located in an existing industrial park, (this is not the case here) or is designated for such purposes in a current resource land management plan verified suitable for such use by RSO&E and ED staff in a property survey’ (such designation in the current review does not pass the litmus test of scrutiny).” (Commenter: TCHA, Charles K. Kraus)

TVA Response: *Allocation of a property for potential industrial use does not necessarily constitute a commitment of that property to that use. Rather, such an allocation indicates that the property is capable of supporting a particular land use and that it may be suitable for that use. If TVA were to allocate Parcel 10 to Zone 5 (Industrial), future requests for industrial use would be subject to approval by the TVA Board. Prior to Board approval, the request would be subjected to additional environmental review. In light of BRMEMC’s withdrawal of the request, TVA developed the Blended Alternative. Under this alternative, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 157: “The TVA has been a good steward of the shoreline of Lake Chatuge. For example, there are very strict rules concerning the shoreline in regard to vegetation and any structures. The TVA enforces these rules with oversight and determination - sometimes almost to the point of viciously protecting the lake and shoreline with huge fines if infractions occur from their rules. I personally know people who have been fined for sometimes what seemed to be minor infractions such as cutting a tree down without TVA's permission. In addition, TVA is currently inspecting all docks and structure on the lake shore and stapling neat plastic covered letters on each dock listing what is required for the shoreline structures to be in compliance with the TVA's high standards. This is a good thing. TVA has just completed doing such an inspection of the Woods Creek cove area (see attached letter). What I cannot understand is if the TVA has such high standards for the shoreline of Lake Chatuge, Why, Why, Why, would the TVA even contemplate, for the first time in TVA history, change the only undeveloped land under their watch care in the Woods Creek cove area from Natural Resource Conservation to Industrial use!!!!!!” (Commenter: James H. and Judy T. Burrell)

TVA Response: *The allocation of Parcel 10 to Zone 5 (Industrial) under Alternative C was proposed in response to a request from BRMEMC. BRMEMC has since withdrawn the request.*

Aggregated Comment 158:

Parcel 10 should not be used for industrial purposes, especially an industrial park. Public lands should not be sold to private industry. Leave it as it is. (Commenters: Bob Astley, Mr. and Mrs. Henry Badach, Fred Betz, Lydia Boeckel, Lesley Brock, Anne Chambers, Wendi and Gordon Cook, Virginia Everett, Jean Helms, Jerry and Jean Herrington, Debbie and John Kelsey, Kenneth Koushel, Ben E. and Peggy I. Lilly, Jill Long, Mary Lynn Miller, Madge Moss, Irene Neller, Mark O'Connell, Angie Purcell, Ed Reams, Charlie Schobel, Gary Sheehan, James Tharp)

TVA Response: *The allocation of Parcel 10 for industrial use was made in response to a request by the BRMEMC. TVA received many comments opposing this allocation. BRMEMC has withdrawn the request. Please note that under Alternatives A and B and under the preferred Alternative D, Parcel 10 would be allocated for natural resource conservation, its current land use.*

Aggregated Comment 159:

There is no overriding need to allocate additional land for industrial use on Chatuge Reservoir. Such an allocation is inconsistent with TVA's policy, “to preserve reservoir lands...except in those rare instances when the benefits to the public will be so significant that transferring the land is justified.” There is an existing industrial park nearby that is underutilized. Other sites away from the reservoir are available if industrial property is needed. (Commenters: Jane and Bona Allen, Mr. and Mrs. Henry Badach, Salli Ball, Tony R. Branan, Harvey B. Brickley, Norris Broyles, III, George B. Brown, James H. and Judy T. Burrell, Robert J. Collins, Leon Davenport, Maria Duben, Deidre and David Fisher, Kevin G. Geiger, Richard Griffin, Gerald P. Gutenstein, Richard and Margaret Guthman, J. D. Heer, Charlie Hendon, Elizabeth Holland, Jill Long, Krista L. Massell, Steve A. Massell, Neal Mulford, David McKenney, Jerry and Renee Montrose, Lt. Col Gene Moss, Neal Mulford, Brendan and Joan Neville, Mark O'Connell, Bill Quarte, Priscilla Richardson, Elizabeth Saunders, Charlie Schobel, Mr. and Mrs. William V. Shakespeare, Gary Sheehan, Nancy Steinfeldt, TCHA, Colleen

Thompson, George and Victoria L. Tucker Jr., Hans Vandergouw, Eli Warnock, Anne and Sam Wilburn)

TVA Response: *Section 2.1 of the DEIS stated, “It is anticipated that land currently committed to a specific use would be allocated to that current use unless there is an overriding need to change the use. Committed lands include the following: properties where TVA has granted landrights (easements, leases, etc.) for specific uses, properties where TVA has previously identified resources in need of protection, TVA Project Operations lands (transmission lines, dam reservations, etc.), and lands fronting national forest properties.” Parcel 10 does not fall into any of these categories and is not considered “committed.” Accordingly, there need not be an “overriding need” in order to change its use.*

TVA’s allocation of Parcel 10 for industrial purposes under Alternative C was in response to a request from BRMEMC. BRMEMC requested the industrial allocation in order to facilitate the potential location of a water intake on Parcel 10 to serve the nearby industrial park. There were no immediate plans to site a manufacturing facility or industrial park on Parcel 10. However, if the parcel were allocated for industrial purposes, some sort of industry could potentially locate there. Because of the absence of infrastructure on Parcel 10, the nearby industrial park would likely be more attractive to potential industries. However, TVA’s land planning for the mountain reservoirs is restricted to the property under TVA control. Suggestions for land use on private property should be addressed to the proper entity.

The allocation of Parcel 10 to industrial use would not necessarily mean that TVA would sell the parcel for that purpose. If Alternative C were adopted, any request for the sale of Parcel 10 would be evaluated for its compliance with the TVA Land Policy and for its potential impacts to the environment. Instead of selling the parcel, TVA could allow the parcel to be used under a lease or an easement.

BRMEMC has since withdrawn its request for Parcel 10. Under the preferred Alternative D, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).

Visual/Aesthetic Quality

Aggregated Comment 160:

Parcel 10 is a scenic forested property near residential areas. A manufacturing plant or other industrial facility on Parcel 10 would be unsightly, especially to nearby residential landowners. The forested landscape of Parcel 10 would be lost if the site is cleared. It would destroy the scenic character of the lake. An industrial facility on Parcel 10 would generate light pollution and excessive noise. Noise travels great distances over water. Thus, this noise would be a nuisance to many lakeside residents. (Commenters: Jane and Bona Allen, Robert F. Astley, Salli Ball, John Beebe, Joe Belanger, Kim Bosco, Tony R. Branan, Harvey B. Brickley, Norris Broyles, III, George B. Brown, James H. and Judy T. Burrell, Anne Caron, Anne Chambers, Robert J. Collins, Wendi and Gordon Cook, Leon Davenport, George Donegan, Craig Evans, Virginia Everett, George Fell, Linda Lee Fike, Mark and Lindsey Fitzgerald, Rhett Grey, John Goddard, Richard and Margaret Guthman, Will Hearce, Jean Helms, C.E. Hewatt Elizabeth Holland, John Humphrey, Donna Hurtak, Debbie and John Kelsey, Debbie and John Kelsey, Jamie Lea, Ben E. and Peggy I. Lilly, Ben Lilly Jr., Jill Long, Carol Maloaf, Karen Mathis, Steve

A. Massell, Krista L. Massell, Linda B. McClure, Janine McKenney, John McKenney, David McKenney, Dwight D. Milleman, John Miller, Jeanne Minichiello, Bett Moses, Carolyn Moss, Lt. Col Gene Moss, Nickey Moss, Teresa Newell, Thomas B. Nichols, Kathy Nix, Diane Pasley, Barbara Pittman, Angie Purcell, Charlie Schobel, Kathryn Scroggs, Mr. and Mrs. William V. Shakespeare, Gary Sheehan, Nancy Steinfeldt, TCHA, Brenda Strickland, Nancy Tharp, Colleen Thompson, Eli Warnock, Linda Westergard, Anne and Sam Wilburn, Hans Vandergouw)

TVA Response: *TVA uses the allocation process to guide the types of land use requests that it may consider. Any land use requests such as easements or property transfers are subject to TVA review and approval before any action on the subject property may be undertaken.*

BRMEMC requested the allocation of Parcel 10 on Chatuge Reservoir for industrial use. The industrial use allocation would facilitate the use of Parcel 10 for access to the water, primarily for a water intake to serve the nearby industrial park. BRMEMC did not have plans to construct an industrial park or a manufacturing facility, and no proposals for the transfer of this land were pending or anticipated at the time of that request. BRMEMC has subsequently withdrawn its request for the industrial use allocation for Parcel 10.

Nevertheless, the potential allocation of Parcel 10 for industrial use was retained as a part of Alternative C in the DEIS and in the FEIS. Thus, the potential environmental effects of the eventual development of Parcel 10 for industrial use (i.e., siting some type of manufacturing facility on the parcel) were analyzed and documented. These potential effects are described in Section 3.2 of the DEIS and FEIS.

TVA has developed a Blended Alternative in the FEIS. Under the Blended Alternative, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation).

Potential noise impacts were mentioned in Section 3.1.11.2.2 of the FEIS. Potential effects to the old-growth forest on Parcel 10 were described in Section 3.2.3.1.2 of the FEIS. Potential visual impacts resulting from the allocation of Parcel 10 to Zone 5 (Industrial) were described in Section 3.2.9.2 of the FEIS.

Biological Resources

Aggregated Comment 161:

The local ecosystem would be damaged if Parcel 10 becomes an industrial site. (Commenters: Jane and Bona Allen, Donna Hurtak, Chris Saunders)

TVA Response: *Potential effects to terrestrial life on Chatuge Reservoir, including plant and wildlife communities, from adopting Alternative C are described in Section 3.2.3. of the FEIS.*

Comment 162: “Birds such as the American Bald Eagle, great blue heron, green heron, osprey, kind fisher have been viewed on Parcel 10. The MRLMP on page S-5 states the following: ‘The development to Parcel 10 on Chatuge Reservoir, however, would likely eliminate the old growth forest, a rare community type and high-quality habitat for wildlife.’ Why would TVA be willing to move forward with a plant (with no outstanding benefits) that they know will affect the environment for wildlife, birds and the citizens of

the area? From our house, very near to Parcel 10, my wife and I have personally identified 82 different species of birds/ducks since 1992. The species include migratory birds/ducks. I have recently mailed TVA (Hill Henry, Terrestrial Zoologist Specialist) via Martin High (forester) a copy of the birds/ducks identified. I don't know if any of these birds/ducks are covered by federal migratory laws/regulations or on any federal or state endangered list. Is the National Audubon Society in agreement with TVA's plan for Parcel 10?" (Commenters: Mr. and Mrs. Henry Badach)

TVA Response: *TVA is not proposing to build any industrial facilities on Parcel 10. The allocation of Parcel 10 for industrial use was in response to a request from BRMEMC for a water intake. That request has been withdrawn. Migratory waterfowl are protected by federal and state laws and regulations. The National Audubon Society is a private, nongovernmental entity with which TVA does not normally consult. The Audubon Society was welcome to submit comments on TVA's proposed allocations but did not do so. TVA has, however, consulted with the U.S. Fish and Wildlife Service in accordance with Section 7 of the Endangered Species Act.*

Comment 163: "In 1992 I could see turtles sunning on the bank of Chatuge Reservoir - - but no longer. MRLMP page 58 recognizes that the American Bald Eagle is considered endangered in Georgia and states that the TVA is committed to following various protection guidelines established to encourage conservation of the species. Why does TVA want to destroy an area where the American Bald Eagle goes and may hopefully nest in the future? I hope the American bald Eagle in Georgia doesn't disappear like the turtles." (Commenter: Mr. and Mrs. Henry Badach)

TVA Response: *TVA is aware that bald eagles have been seen on Parcel 10. Because of recent increases in its population numbers nationwide, the bald eagle has been removed from the Federal Endangered Species List. Allocating this parcel to industrial use would not significantly affect their habitat (see Section 3.2.4.2).*

Comment 164: "Development of Parcel 10 will negatively impact wildlife including the impact on or elimination of suitable habitat for endangered or threatened species such as bald eagles, Indiana bats and American columbo. Draft EIS at S-5, 33 and 99 -100." (Commenter: Gary Sheehan, Annette Gelbrich)

TVA Response: *Potential development under Alternative C would result in the possible extirpation of a population of American columbo (*Frasera carolinensis*), a listed species in North Carolina (see Section 3.2.4.2 of the FEIS). This plant is not listed in Georgia, where there are stable populations. As stated in Section 3.2.4.2, suitable habitat for Indiana bats and bald eagles on Parcel 10 could be affected if Alternative C were adopted.*

Aggregated Comment 165:

Parcel 10 on Chatuge Reservoir provides habitat for a variety of wildlife, including deer, bears, turkeys, foxes, bobcats, groundhogs, and bats. A variety of birds, including the bald eagle and pileated woodpeckers, inhabit Parcel 10. Locating an industrial facility on Parcel 10 would destroy the habitat for these species. (Commenters: Mr. and Mrs. Jon Anderson, Brenda Arnett, Robert F. Astley, Casey Barnes, Erin Barnes, Joe Belanger, Graham & Phyllis Bell, Michael Bever, Jetta Bradley, Mike Brewster, Harvey B. Brickley,

George B. Brown, Norris Broyles, III, James H. and Judy T. Burrell, Russ Cagle, Anne E. Caron, Bill Cogle, Wendi and Gordon Cook, DonnaLee DeMuth, Ross DeMuth, Tucker DeMuth, Ophelia Dickey, Paulette Doyeir, Michael Donohue, Edward Duben, Maria Duben, Janet Duke, Jim Duke, Ellen Edwards, Linda Lee Fike, Deidre and David Fisher, Carol and Clifford Hall, James Hendry, Shamina Henkel, Gail Herring, Elizabeth Holland, Bill Herold, C. E. Hewatt, John Humphrey, Debbie and John Kelsey, Margaret M. Knight, Gary M. Kopacka, Paul & Victoria Lajoie, Margaret Leslie, Ben E. and Peggy I. Lilly, Ben Lilly Jr., Jill Long, Theresa Marcucci, Steve A. Massell, Karen Mathis, Linda B. McClure, David McKenney, Mary Miller, Jeanne Minichiello, Bett Moses, Blake Moss, Carolyn Moss, Lt. Col Gene Moss, Nickey Moss, Katrina Morris, Neal Mulford, Jennifer Myers, Sylvia Neese, Teresa Newell, Greg Noojin, Rena Noojin, Thomas B. Nichols, Kathy Nix, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, Diane Pasley, Barbara Pittman, William Edward Preye, Diane Pulley, Eddie Pulley, Bill Quarte, Beverly Rambo, Robert Rambo, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Robin Roberts, Jerry and Faye Rogers, Thomas A. Romine, Judy Rosasco, Cheryl Russell, Chris Saunders, Elizabeth Saunders, Charlie Schobel, Leonore Smallridge, Albert Swint, TCHA, Tracey Tharp, Colleen Thompson, George and Victoria Tucker, Jan Waldron, Linda Westergard, Anne and Sam Wilburn, Donna Van House, Becky Vashon)

TVA Response: *Under Alternative C, the 27.2-acre Parcel 10 would be allocated to Zone 5 (Industrial). If the site were eventually developed for industrial use, most likely, much of the tract would be cleared, and wildlife habitat would be lost. Direct effects to wildlife from industrial development and use of the parcel would tend to be localized to the area around Parcel 10. Effects to wildlife under Alternative C are described in Section 3.2.3.2 of the FEIS. Under the preferred Alternative D, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation), which is its current land use. A Zone 4 allocation would result in essentially no change in the current conditions with respect to wildlife and its habitats.*

Comment 166: “MRLMP page 53 states that the rezoning of Parcel 10 would have localized adverse effects. A feeble attempt is made by TVA to minimize the local adverse effect by stating that a loss of open space would be minor in the context of the large amount of TVA and USFS land retained on the reservoir. I don’t agree with the concept that it is okay to harm local interest because it is not significant compared to the large amount of TVA and USFS land elsewhere on the reservoir (MRLMP pg. 87 and 95). Why does TVA think it’s okay to purposely harm anyone? I don’t believe that anyone reading this letter would be willing to be financially affected by TVA, or some other entity, creating an industrial zone near their home located in a residential area.” (Commenter: Mr. and Mrs. Henry Badach)

TVA Response: *Potential effects to wildlife communities were summarized in Section 3.2.3.2 of the DEIS. Under Alternative C, Parcel 10 would be allocated to Zone 5 (Industrial). Direct effects to wildlife from industrial development and use of the parcel would tend to be localized to the area around Parcel 10.*

TVA has no intention of harm. One of TVA’s primary tasks is to provide for continued economic development, and the allocation of land for industrial use in appropriate situations is part of this effort. Under the preferred Alternative D, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation). This

would result in essentially no change from current conditions with respect to wildlife and its habitats.

Aggregated Comment 167:

Parcel 10 is currently vegetated with a mature forest. Use of the site for a manufacturing facility or other industrial use would likely require the clearing of this forest and the loss of ecologically valuable old growth forest. (Commenters: Jerry and Betty Anderson, Robert F. Astley, Mr. and Mrs. Henry Badach, Harvey B. Brickley, George B. Brown, Norris Broyles, III, James H. and Judy T. Burrell, Anne Caron, Robert J. Collins, Wendi and Gordon Cook, Maria Duben, Deidre and David Fisher, Annette Gelbrich, John Goddard, Rhett Grey, Elizabeth Holland, John Humphrey, Ben E. and Peggy I. Lilly, Jill Long, Karen Mathis, Steve A. Massell, David McKenney, Bett Moses, Carolyn Moss, Lt. Col Gene Moss, Neal Mulford, Bill Quarte, Angie Purcell, Robin Roberts, Chris Saunders, Elizabeth Saunders, Charlie Schobel, Mr. and Mrs. William V. Shakespeare, Gary Sheehan, Ann T. Spalding, TCHA, Colleen Thompson, George and Victoria Tucker, Hans Vandergouw, Donna Van House, Eli Warnock, Linda Westergard, Anne and Sam Wilburn)

TVA Response: *TVA's allocation of Parcel 10 for industrial purposes under Alternative C was in response to a request from BRMEMC. BRMEMC requested the industrial allocation in order to facilitate the potential location of a water intake on Parcel 10 to serve the nearby industrial park. There were no immediate plans to site a manufacturing facility or industrial park on Parcel 10. However, if the parcel were allocated for industrial purposes, some sort of industry could potentially locate there. If Alternative C were adopted, TVA could consider future requests for industrial uses on Parcel 10. The potential effects of development of Parcel 10 were considered in the DEIS and FEIS. These effects include the potential loss of old-growth forest on Parcel 10 under Alternative C, as described in Sections 3.1.3.1.2 and 3.2.3.1.2 of the FEIS.*

BRMEMC's request for an industrial allocation on Parcel 10 has been withdrawn. TVA's preferred alternative allocation for Parcel 10 is Zone 4 (Natural Resource Conservation).

Cultural Resources

Aggregated Comment 168:

Development of Parcel 10 for an industry would affect archaeological resources on the site and historic structures in the area. TVA did not research these issues. (Commenters: James H. and Judy T. Burrell, Steve Massell, TCHA)

TVA Response: *The description in the DEIS of archaeological sites on Parcel 10 is in error. The parcel was surveyed in 1999, and the results are stated in the report entitled "Archaeological Survey of the Chatuge Reservoir Shoreline Management Zone and 603 acres of Public Lands." No significant archaeological sites were identified within Parcel 10. The FEIS has been updated to reflect this change. TVA apologizes for any confusion this may have caused. Because no significant archaeological sites exist on Parcel 10, no effects to this parcel are anticipated under any of the alternatives.*

In the event a land use request for Parcel 10 is received by TVA, any historic and architectural resources within the view of Parcel 10 would be identified once

detailed plans are submitted. A definitive determination of the scope and the potential effects of a development on these resources cannot be made until detailed plans are submitted to TVA. Absent project-specific information, one may speculate that a project may have an effect on those resources.

Water Quality

Aggregated Comment 169:

A manufacturing plant or industrial facility on Parcel 10 would cause water pollution. Besides the effluent, including sewage, from the plant, there would be runoff from the site, especially during construction. An industry could need to withdraw water from the lake. This is not adequately covered in the MRLMP. (Commenters: Mr. and Mrs. C. Jon Anderson, Mr. and Mrs. Henry Badach, Tony R. Branan, Harvey B. Brickley, Norris Broyles, III, Anne Chambers, Robert J. Collins, Kevin G. Geiger, Doug Hadaway, Ken Halron, Will Hearce, Bill Herold, Gail Herring, C. E. Hewatt, Elizabeth Holland, John Humphrey, Debbie and John Kelsey, Paul and Victoria Lajoie, Ben E. and Peggy I. Lilly, Ben Lilly Jr., Jill Long, Theresa Marcucci, Steve A. Massell, David McKenney, Jeanne Minichiello, Bett Moses, Blake Moss, Neal Mulford, Kathy Nix, Maria Peane, Charlie Schobel, Gary Sheehan, Nancy Steinfeldt, TCHA, Colleen Thompson, George and Victoria Tucker, Eli Warnock, Anne and Sam Wilburn)

TVA Response: *TVA is not aware of any plans for a manufacturing facility or an industrial park on the 27.2-acre Parcel 10. Allocation of Parcel 10 under Alternative C for possible industrial use was in response to a request from BRMEMC to facilitate a water intake. BRMEMC has since withdrawn the request.*

If Parcel 10 were to be allocated for industrial use, there is a possibility that the site could be used for industrial purposes at some time in the future. However, such a use would be subject to TVA approval and additional environmental review. An industry seeking to locate on Parcel 10 would be subject to various state and federal laws and regulations. The acquisition of necessary water quality certifications and appropriate permits by the industry would be required prior to TVA granting the use of the property. The extent of potential effects to local water quality would depend in large part on the nature of the operations of the subject industry. Potential effects to water quality in Chatuge Reservoir under Alternative C are described in Section 3.2.10.2 of the FEIS.

Comment 170: “Of primary concern is the proposed Zone 5 (Industrial) designation for Chatuge Parcel No. 10. HRWC has more recently been informed by Blue Ridge Mountain Electric Membership Corporation (BRMEMC) that its intent in the request was only to secure a place to withdraw water from Lake Chatuge to potentially service industries in the nearby Clay-Towns Industrial Park; however, TVA’s Zone 5 designation would allow for the sale of this 27.2-acre parcel for ‘private industrial use.’ This could open up the land, which currently supports a mature forest, for much more intensive development than a water line. One of the most pressing concerns for the ecological health of Lake Chatuge detailed in the CWAP is stormwater runoff from impervious surfaces. The most critical part of the watershed in this regard and the part that is already most compromised around Lake Chatuge is shoreline land along the US 76 and GA 515/NC 69 corridors. This is where Chatuge Parcel No. 10 lies. Finally, although conventional pollutants are regulated by federal NPDES permits, discharges from

industrial processes are often heated, encouraging algae growth and shifting the natural cold-water fish community.” (Commenter: Gilbert S. Nicolson)

TVA Response: *If TVA were to adopt Alternative C, TVA would entertain requests for use of Parcel 10 for industrial purposes. Any such request would require TVA approval and would be subjected to an appropriate environmental review prior to any decision on the proposal. Potential effects to the old-growth forest on Parcel 10 under Alternative C are described in FEIS Section 3.2.3.1.2. Potential effects to water quality under Alternative C are discussed in FEIS Section 3.2.10.2.*

Comment 171: “Our lake has a rating of poor water quality (e.g. the lake is dying) and any additional development would contribute to this problem, second we have been in a severe drought and the lake is below its balancing guide - wouldn't industrial use include pulling water from the lake, third is the adjoining neighborhoods and children at the campgrounds would be at risk of pollution.” (Commenter: Anne Chambers)

TVA Response: *Depending on the type of industry or facility, the withdrawal of process or cooling water is a potential industrial use. Parcel 10 on Chatuge Reservoir was allocated to Zone 5 (Industrial) under Alternative C as a result of a request by BRMEMC for water access. BRMEMC has since withdrawn its request. No other requests concerning Parcel 10 have been received. Under Alternative B and the preferred Alternative D, Parcel 10 would be allocated to Zone 4 (Natural Resource Conservation). Potential effects to water quality under Alternative C are discussed in FEIS Section 3.2.10.2.*

Vehicular Traffic

Aggregated Comment 172:

The current vehicular access to Parcel 10, including the right-of-way, is inadequate to accommodate industrial use of the parcel. Additional property might have to be used for roadways and infrastructure upgrades necessary for an industry. Such upgrades are expensive. Woods Creek Drive is a narrow road that was not designed or built for heavy traffic. The roadway would have to be widened and new pavement installed. The present Right of Way is not wide enough to widen the road and more property would have to be taken from the property owners, further lowering the property values. (Commenters: George B. Brown, John Humphrey, Jeanne Minichiello)

TVA Response: *Vehicular access to Parcel 10 is limited. However, access could possibly be provided via Woods Creek Drive or from SR 1183 in North Carolina. If industrial development were to occur under Alternative C, improved vehicular access, including a wider right-of-way, would likely be necessary. Responsibility for providing or upgrading access roads would be the responsibility of the respective counties or states. Under Alternatives A and B and under the preferred Alternative D, the allocation of Parcel 10 would be Zone 4 (Natural Resource Conservation), and improved access to the parcel would not be necessary.*

Socioeconomics

Comment 173: “[Parcel 10] I don't understand the benefits to the stakeholders in Towns County for such a development. The size is so small it will have minimal economic impact. All that I can deduce is that TVA is acting in its own short term financial interest without regard to the health of the lake or the health of the citizens of Towns County.” (Commenter: Doug Hadaway)

TVA Response: *The allocation of Parcel 10 for industrial use under Alternative C was in response to a request by BRMEMC. BRMEMC has since withdrawn that request, and Parcel 10 is allocated to Zone 4 (Natural Resource Conservation) in TVA's preferred Alternative D.*

Aggregated Comment 174:

Use of Parcel 10 for industry would have socioeconomic effects on the area. The presence of an industrial facility on Parcel 10 would decrease tourism, which is an important source of economic income for Towns County. Property values, especially those of nearby homes and upscale homes within the viewshed of an industrial facility, would decline. Consequently, Towns County would have less income, and taxes could be raised to offset the shortfall. (Commenters: Jane and Bona Allen, Robert F. Astley, Mr. and Mrs. Henry Badach, Joe Belanger, Harvey B. Brickley, Norris Broyles, III, George B. Brown, James H. and Judy T. Burrell, Robert J. Collins, Wendi and Gordon Cook, Mark and Lindey Fitzgerald, Kevin G. Geiger, Annette Gelbrich, Rhett Grey, Doug Hadaway, John Humphrey, Kenneth Koushel, Jill Long, Steve A. Massell, David McKenney, Bett Moses, Nickey Moss Lt. Col Gene Moss, Brendan and Joan Neville, Mark O'Connell, Robin Roberts, Kathryn Scroggs, Gary Sheehan, Charlie Schobel, TCHA, Jim Tharp, Tracey Tharp, Colleen Thompson, Anne and Sam Wilburn)

TVA Response: *The socioeconomic analysis and findings as stated in Section 3.2.12.2 of the DEIS and FEIS are accurate. The analysis was based on the assumption that an industry would locate on Parcel 10. If this were to happen, jobs would be created, and the county would likely realize increased property tax revenues. The statement about negative effects from the loss of nearby property values is also valid. However, the siting of an industry or commercial enterprise on Parcel 10 is unlikely for two reasons. First, BRMEMC requested the industrial allocation in order to facilitate the location of a water access point. No industrial development was planned, and TVA has not received any request for industrial uses of Parcel 10 on Chatuge. Second, under the preferred Alternative D, Parcel 10 would be allocated for Natural Resource Conservation (Zone 4).*

Air Quality

Aggregated Comment 175:

Use of Parcel 10 as an industrial site would generate air pollution. (Commenters: Mr. and Mrs. Henry Badach, Harvey B. Brickley, Norris Broyles, III, Robert J. Collins, Maria Duben, Deidre and David Fisher, Debbie and John Kelsey, Jill Long, Steve Massell, David McKenney, Jeanne Minichiello, Bett Moses, Kathy Nix, Maria Peane, Bill Quarte, Chris Saunders, Elizabeth Saunders, Charlie Schobel, Gary Sheehan, Nancy Steinfeldt, TCHA, Colleen Thompson, George and Victoria Tucker, Anne and Sam Wilburn)

TVA Response: *The amount of air pollution generated would depend on the nature of the industry, along with the operational procedures and pollution controls implemented during operation. If TVA were to adopt Alternative C, any industry seeking to locate on Parcel 10 would be required to demonstrate that all appropriate air quality permits would be secured prior to TVA approval of the applicant's request for the land use. Potential impacts to air quality under Alternative C are discussed in Section 3.2.11.2 of the FEIS.*

Boating Activity

Comment 176: "Parcel #10 - No change to industrial development. There is already an industrial development in place nearby that is less than 33% occupied. An industrial operation will continue to decrease the lake Chatuge water quality that is declining rapidly. The lake is already overcrowded and there is no need for a deep water ramp. If you don't believe that lake is overcrowded just visit the cove at Parcel # 23 and 22. Boats are too large for this lake. Engines are too large. Noise pollution is rapidly increasing and both boat and motor size should be regulated. Shoreline erosion is rapidly increasing with the increased boat traffic. Please, no new industrial development on Lake Chatuge." (Commenter: Tony R. Branan)

TVA Response: *TVA is not aware of any requests for a deep water ramp associated with the possible allocation of Parcel 10 for industrial use under Alternative C. Such an allocation is not likely to increase the number of boats in the vicinity. TVA does not regulate boat or motor size on its lakes, as the respective states have jurisdiction over these matters.*

Recreation

Comment 177: "The DEIS says that . . . allocating Parcel 10 to Industrial would decrease opportunities for recreation use of area 10. One can only say that this is a brilliant conclusion and representative of the substandard thinking behind this entire proposal." (Commenter: TCHA)

TVA Response: *Comment noted. Although developed recreation is ordinarily limited to Zone 6 lands, dispersed recreation can and does occur on lands that are allocated to all zones except, in many cases, Zone 5 (Industrial). Thus, the allocation of a parcel to Zone 5 likely would decrease the opportunity for dispersed recreation on that parcel more than an allocation to Zone 2, Zone 3, Zone 4, or Zone 6 would.*

Aggregated Comment 178:

Chatuge Reservoir is used heavily for recreation. Use of Parcel 10 as an industrial site would reduce or eliminate recreation potential in the area, including fishing on the lake. (Commenters: Mr. and Mrs. Henry Badach, James H. and Judy T. Burrell, Robert J. Collins, Will Hearce, Charlie Hendon, John Humphrey, Donna Hurtak, Ben Lilly Jr., Ben E. and Peggy I. Lilly, Jill Long, Steve A. Massell, David McKenney, Neal Mulford, Blake Moss, Carolyn Moss, Anita Neal, Teresa Newell, Gary Sheehan, Nancy Steinfeldt, TCHA)

TVA Response: *Comment noted. Depending on the type of industry seeking to locate on Parcel 10, there could be a decrease in water-based recreational opportunity in the area. As stated in Section 3.2.2.2 of the FEIS, location of a facility on Parcel 10 would likely eliminate on-site dispersed recreation opportunities and could affect fishing in the Woods Creek area.*

Comments on Chatuge Parcel 52

Support Proposed Allocation

Aggregated Comment 179:

Parcel 52 should be used for recreational purposes such as soccer fields. Parcel 52 would be a suitable location, and the county needs additional recreational sites. The county should be allowed to develop Parcel 52 for recreational purposes. (Commenters: Kristina Albach, Andrea Anderson, Phillip W. Baxter, Don H Berry, Robert N. Brewer Jr., Shannon C., Sherry D. Canterbury, Dudley and Peggy Castile, Nancy Church, Kay and Dick D., Scott Davis, David and Deedee England, Johnny F, Cala Franks, David L. Geiger, Betty Bryce Greenhaur, Rhett Grey, Richard Griffin, Robert L. Guenhaur, Gerald P. Gutenstein, Heath H., Eileen Hedden, Linda Hedden, Edward Heddin, Darlene Hills, Donald Hogsed, Chad Hooper, James Howell, Angela Kendall, Robert A. Keys, J. Kinsey, Charles K. Kraus (TCHA), Becky Landress, Deanna M. Ledford, Elisabeth and Oskar Letrotsky, Ben E. and Peggy I. Lilly, Ben Lilly Jr., Jerry B. McFalls, Kristy McFalls, Jack and Mary Miller, Jerry and Renee Montrose, Mary Mullin, Kim Patterson, C. Thomas and Shirla Petersen, Leonard and Millie Poole, Johnny Rogers, Mikey Rogers, Michael Rogers, Sara Rogers, Barbara Shoak, Casey Shook, Carl S. Shultz, Joe Spellman, Richard Storck, Marian Summer, Jenny Tay, Todd Turner, Towns Co. Recreation Staff, Elizabeth H. Ruf, Kyle W., Barry and Tricia White, Tom Winn, Gale Wood, Henna Wood, unknown, unknown, illegible (18))

TVA Response: *Parcel 52 has been reviewed for potential future recreation uses. It was found to be suitable for and capable of supporting such uses. Under Alternative C and TVA's preferred alternative (Alternative D or the "Blended Alternative"), the allocation for Parcel 52 is Zone 6: Developed Recreation. Under Alternatives A and B, Parcel 52 would be allocated to Zone 4 (Natural Resource Conservation). Thus, if TVA were to adopt Alternative C or D, proposals for developed recreational use of Parcel 52 would be entertained. Specific recreation proposals on Parcel 52 would be subject to an environmental review prior to TVA taking action.*

Oppose Proposed Zone 5 Allocation

Aggregated Comment 180:

The allocation of Parcel 52, a waterfront property, should not be changed from its present status to a Zone 5 (industrial) allocation. This would be inconsistent with the aesthetic character of the lake, could decrease local property values, generate noise or damage water quality. (Commenters: Robert Backstrom, Sandra Chapin, Tom Chapin, Jeanne Minichiello, Carl S. Shultz, Barry and Tricia White)

TVA Response: *Parcel 52 is not proposed for industrial usage under any of the alternatives (see Table 2-10 in the FEIS). Under Alternatives A and B, Parcel 52 would be allocated to Zone 4 (Natural Resource Conservation). Under Alternative C, Parcel 52 would be allocated to Zone 6 (Developed Recreation). Under Alternative D, Parcel 52 would be allocated to Zone 6 and Parcel 52a would remain allocated to Zone 4. A 1.4-acre portion of the original Parcel 52 will likely be sold for use as a substation site to BRMEMC. The potential environmental effects of that transfer were addressed in the EA, "Blue Ridge*

Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.”

Oppose Proposed Zone 6 Allocation

Aggregated Comment 181:

Do not change the allocation of Parcel 52 to Zone 6 for future recreational use. Locations elsewhere (i.e., off the lake) are more appropriate for recreational use. Use of Parcel 52 for recreation would have adverse economic effects, would generate unwanted noise, and could disturb endangered species such as the bald eagle. Parcel 52 should be allocated to Zone 2, 3, 4 or used for residential development.

(Commenters: Annette Gelbrich, Kenneth Koushel, Jeanne Minichiello, C. Thomas, and Shirla Petersen)

TVA Response: *The potential effects of allocating Parcel 52 for future recreational uses are described in Section 3.2.2 of the FEIS. The identification of off-reservoir locations for recreational use would be the responsibility of the county or other organizations responsible for providing such amenities, as TVA does not control any local off-reservoir properties. Provision of shoreline property for residential development is inconsistent with TVA’s Land Policy.*

Public Safety

Comment 182: “Regarding # 52, 2 acres across from Parker Oil on State Route 76 was proposed for development of a ball field, to oppose the possible construction of an electrical grid. Concerns: 1. this limited-space parcel is not conducive for safe recreational usage. 2. There is a proven health risk resulting from exposure to an electrical grid.” (Commenter: Maria Duben)

TVA Response: *The 9-acre tract identified as Parcel 52 in the DEIS has been divided into three areas: a 6.1-acre portion that is identified as Parcel 52 in the FEIS, a 1.9-acre portion that is identified as Parcel 52a in the FEIS, and a 1.4-acre portion that would likely be sold for use as a substation site. Under Alternative C and the preferred Alternative D, the allocation for the 6.1-acre Parcel 52 is Zone 6 (Developed Recreation). This size is adequate to provide public recreation opportunities such as picnicking, practice ball fields, etc. Because of its size, a developed sports facility such as a ball field with bleachers, parking, etc. is not feasible. Under Alternative C, the allocation of the 1.9-acre Parcel 52a is Zone 4 (Natural Resource Conservation). A 1.4-acre portion of the original 9-acre tract has been approved for sale by TVA for use as a substation site. Potential effects associated with electric and magnetic fields are described in the EA, “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.” Recreational uses on the remainder of the parcel are compatible with the substation proposal.*

Comments on Chatuge Parcel 77

General

Comment 183: “In addition, given the uncertain economic times, I would very much like to know who is proposing to waste taxpayer dollars on such a project [Parcel 77]. Perhaps they are charging too much in the way of taxes if they are so set on burning off an over-collection.” (Commenter: Rick LaPlante)

TVA Response: *Under Alternative C, Parcel 77 would be allocated to Zone 6 (Developed Recreation) to accommodate a request by Towns County and the City of Hiwassee for the development of a multiple-field sports complex and associated recreational facilities. The costs of this recreational development would be borne by Towns County and the City of Hiwassee. Parcel 77 is allocated to Zone 4 (Natural Resource Conservation) under TVA’s preferred Alternative D.*

Comment 184: “The TCHA proposes to both TVA and Towns County a three step process whereby the county will earn the right to its requested lease and the citizens will be assured of their opportunity to review the county proposals with their ability to critique and assist in the creation of a mutually agreeable project with costs that we all can afford. First, before considering leasing additional property to the county for another park, TVA and the County must get together and remedy the CWCG (Parcel 13) situation. A review prepared in 2005 by TCHA members with engineering and environmental backgrounds together with a remedial action plan was presented to TVA again in our 27 August response to this comment period. These reports can be used as a starting point. TCHA stands ready to assist both parties in planning, developing and executing this effort. Removing the stigma of the CWCG will go a long way towards removing the concerns that Towns County cannot properly manage its public facilities. Once the Chatuge Woods situation is restored but before any lease to the County is consummated or change to the Parcel 77 designation finalized, the County should be required to draw up a detailed design for the planned use of the property and vet that design with a public hearing in a manner similar to that used by TVA. This plan should include a 100-foot buffer composed of the existing natural vegetation on ALL sides of the property, a layout which identifies all the facilities, ball fields etc. planned for the parcel, parking requirements and traffic patterns, lighting requirements and use rules, operating procedures including open/close times, night use limitation and security plans including a monitored electronic security system and in place county ordinances providing penalties for the violation of the use/prohibited use rules with the management structure and personnel identified. It must also include an Environmental Impact Study and significant involvement of the Hiwassee River Watershed Coalition to insure that any development of the parcel will adequately protect the water quality in the lake.

Thirdly, the TVA must require that the county present them and the citizens of the county with a development schedule and funding plan including identified sources of such funding. Finally, after vetting these plans with the public and considering and incorporating their responses, if TVA and the County can conclude an agreement which generally satisfies the public, the County’s request should be granted. If these or a set of similar conditions cannot be met, the request should be denied and Parcel 77 left in the present classification. These activities should be required to be completed within not less than 12 or more than 18 months. The above requirements for the TCHA

endorsement are perhaps unusual and certainly strict. However the opinion of our membership on this proposal is clearly mixed although slightly in favor of the County's request." (Commenter: TCHA)

TVA Response: *Please note that under TVA's preferred Alternative D, the allocation of Parcel 77 would be Zone 4 (Natural Resource Conservation). However, should TVA adopt Alternative C, a request from the county for the use of Parcel 77 would be required. This request would necessarily include detailed site plans, etc., so that TVA could conduct an appropriate level of environmental review and properly evaluate the request. Because of the obvious public interest in Parcel 77, public involvement would be integral to TVA's environmental review. However, Towns County would be solely responsible for the decision whether to involve the public before submitting a proposal to TVA.*

Comment 185: "The parcel is uniquely situated and before modifying the zone designation, a comprehensive plan should be available for review and comment. We respectfully request that careful consideration be given to protecting the overall environmental setting by limiting the 'developed recreation plan' to those activities that would minimize land disturbance, protect the shoreline and the 'overall environment' of both the parcel itself and its unique position in the geographical setting of the reservoir. To best accomplish these aims, we recommend that any plan for development be submitted by a public entity, such as Towns County or a non-profit, with a stipulation that contracting to a private for profit operation will be barred." (Commenter: Richard Griffin)

TVA Response: *Allocation of a property for potential recreational use does not necessarily constitute a commitment of that property to that use. The allocation of a parcel indicates that the property is capable of supporting and may be suitable for that use. If TVA were to allocate Parcel 77 to Zone 6, future requests from appropriate, responsible organizations for recreational use would be subject to additional environmental review and approval by TVA. Prior to this review, TVA would require the applicant to provide detailed plans. The agreement for the use of the property would stipulate allowable uses.*

Comment 186: "At what point will TVA realize that if measures are not taken to protect the riparian zone, the zone will become analogous to a water strip mall?" (Commenter: Terry Harrington)

TVA Response: *The condition of shorelines is an important concern on TVA reservoirs. TVA developed the "Shoreline Management Initiative EIS: An Assessment of Residential Shoreline Development Impacts in the Tennessee Valley" in 1998. This EIS addressed issues of shoreline development and formed the foundation of TVA's current Shoreline Management Policy for residential shoreline access. Further, in addition to whatever appropriate conditions are required after environmental reviews for development requests on its lands, TVA routinely requires the use of best management practices to reduce impacts. However, TVA cannot control development or the quality of management of land it does not own.*

Aggregated Comment 187:

Chatuge Parcel 78 is an island near Parcel 77. Except for periods of high water in the summer, this island is accessible by a land bridge from Parcel 77. Allocating Parcel 77

for recreational use will adversely affect Parcel 78. (Commenters: Walter Krueger, Jeanne Kopacka, Edward Wesson)

TVA Response: *TVA is not contemplating any allocation changes for Parcel 78. This parcel is currently available for dispersed recreational use. Allocating Parcel 77 for Developed Recreation could increase the potential for additional dispersed recreation on Parcel 78. Under TVA's preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation), and the level of dispersed recreation on both parcels would remain virtually unchanged from current levels.*

Comment 188: "Please do not change parcel 77 from its current status. Lake Chatuge is 75% built out and our pollution on the lake can be seen daily. I can look out my window and see 'foam' on my shoreline from pollution. Towns County is not equipped to handle anymore run off into our lake. We have plenty of trailer camping on the lake but hardly any for just tents and once the trailers get in place they sell them as lake front property as in the campground on Redbank Drive. Towns County needs to keep the goose that laid the golden egg--if they continue losing the beauty and quality of our lake, it will be economically devastating!" (Commenter: Judy Rosasco)

TVA Response: *Comment noted.*

Comment 189: "Parcel 77 is proposed to be redeveloped for additional recreational areas. However, there is private property in parcel 76 that may be jeopardized by this development." (Commenter: Walter Krueger)

TVA Response: *Parcel 76 is a strip of TVA-owned property that runs along the shoreline. There is no private property within Parcel 76. However, there is backlying private property adjacent (i.e., inland) to Parcel 76.*

Comment 190: "Has Towns County/TVA or the developer performed an Environmental Impact Statement (EIS)? This would help identify any potential environmental impacts that would need to be challenged by the homeowners around the lake." (Commenter: E. B. and Nancy Pulley)

TVA Response: *The potential impacts of allocating Parcel 77 to developed recreation are addressed in this FEIS. If TVA makes this allocation change, TVA would conduct another environmental review of any subsequent development proposal for Parcel 77.*

Aggregated Comment 191:

TVA should allow Parcel 77 to be developed for residential lake front properties rather than for recreational use. Proceeds could be used to buy other, off-reservoir properties for a sports complex and to improve water quality. (Commenters: B. F. Farmer, Karen Holmes)

TVA Response: *In accordance with the TVA Land Policy (see FEIS Appendix A), TVA no longer allocates land for residential development.*

Support Proposed Zone 6 Allocation*Aggregated Comment 192:*

Parcel 77 should be allocated to Zone 6, developed recreation. The county needs additional recreational facilities. (Commenters: Kristina Albach, Val Aldrop, Brandy Anderson, Amy Barrett, Phillip W. Baxter, Darren Berrong, Beverly and Gene Bolsius, Madeline Botting, Richard Botting, Robert N. Brewer Jr., Michael Brock, Shannon C., Sherry D. Canterbury, Kay and Dick D., Johnny F., John Fitzgerald, Cala Franks, Jeff Garitt, David L. Geiger, Betty Bryce Greenhaur, Robert L. Guenhaur, Gerald P. Gutenstein, Heath H., Darlene Hills, Donald Hogsed, Chad Hooper, James Howell, J. Kinsey, Deanna M. Ledford, Jerry B. McFalls, Kristy McFalls, Jack and Mary Miller, Stephen M. Morris, Mrs. James Murray, Kim Patterson, Leonard and Millie Poole, Alan Rogers, Johnny Rogers, Mikey Rogers, Sara Rogers, Carl S. Schultz, Casey Shook, Marian Summer, Barbara Shoak, Jenny Tay, Towns Co. Recreation Staff, Todd Turner, Kyle W. ,Connie Wallace, Ward and Shirley Woolley, Tom Winn, Gale Wood, Henna Wood, unknown, illegible (18))

TVA Response: *Comment noted.*

Comment 193: "Our kid's teams start traveling as soon as they are eight years old. Needless to say no one travels to Hiawasee. The reason is we don't have adequate facilities. This hurts our local businesses. People might not come up here for the fair because gas is so high, but if their kids have a soccer game, then they will come. When visiting teams and their families come to Towns County, they eat, shop, and, spend money which helps our local economy. Another use that this land should be used for is baseball fields in which we don't have to worry about our children getting run over. Right now we park on the highway and the fields are just a few feet away from a major U.S. Highway. It is very dangerous at night and for foul balls being hit onto the highway. I'm shocked someone hasn't gotten run over or hurt yet." (Commenter: Amy Barrett)

TVA Response: *Comment noted.*

Oppose Proposed Allocation

Comment 194: "I am concerned about lights, noise, drainage problems, trucks to develop land, loss of wildlife, pollution of our lake, which we use as our drinking water. I am concerned about the pollution to our lake especially, to the soil, to the air. I am concerned about the loss of virgin forests and animal and plant habitat. Don't do it! We need this land as it is now and in the future to remain as it is." (Commenter: Karen A. Kopec)

TVA Response: *Comment noted.*

Aggregated Comment 195:

We are opposed to any development on Parcel 77. Parcel 77 should remain in its natural state and stay in a Zone 4 designation. (Commenters: Bruce and Bonnie Bennett, Kim Carew Chicoine, Mary Childress, William J. and Brenda R. Collins, Natasha Darwent, Herbert S. Gatch, Matthew Humphreys, Nancy Johnson, Kenneth Koushel, Duane F. and Jean G. Miller, C. Thomas and Shirla Petersen, Jonathan and Stephanie Roberts, Barbara L. Russell, Edward Wesson)

TVA Response: *Comment noted.*

Aggregated Comment 196:

There is too much development on Chatuge Reservoir. We are opposed to the development of Parcel 77. (Commenters: Donald K. Carew, J. Thomas Chapin, Natasha Darwent, Michael Derby)

TVA Response: *Comment noted. Under the Blended Alternative, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 197: “We are also very much opposed to any change in usage of Parcel 77, a 66.4 acre tract in the middle of Lake Chatuge. This land is currently in the Zone 4 usage and is currently meeting the needs of the people that currently use it for camping, fishing, hiking, biking, hunting, etc. Any change to this Parcel 77 would be incompatible with the surrounding areas of Hidden Valley Estates, Cedar Cliff, Amber Lane Estates, Heather’s Cove Hedden Cove, Tranquill Pointe, Ramey Mountain, Young Harris Mountain, and others. Noise levels, scenic view, endangered Georgia wildlife (bald eagle sighted several times in this area by us and other family), plant life and vegetation could all be negatively impaired on this Parcel 77, if the usage were changed from Zone 4 to Zone 6.” (Commenter: Ben Lilly Jr.)

TVA Response: *Comment noted. The potential effects to the resources mentioned are described in Section 3.2 of the EIS.*

Comment 198: “I am aware Towns County is seeking an inexpensive site for youth ball fields. I support youth athletics. However, I do not endorse this site for that purpose – especially without any plans depicting the proposed development. As a commercial Realtor, no zoning or variance request is ever passed without public and elected officials having a chance to review specific plans, comment, and approve/deny such changes. There are no overriding needs to change the designation of this parcel. TVA should follow suit with its zoning process.” (Commenter: Steve A. Massell)

TVA Response: *TVA is a federal agency and thus not subject to local zoning regulations in the management of its property holdings. As evidenced by these comments on the DEIS and the description of other public involvement in FEIS Sections 1.5 and 1.6, TVA has sought input from the public, agencies, and elected officials during this planning process. In addition, allocation of a parcel for potential recreational use does not necessarily constitute a commitment of that parcel to that use. If TVA were to allocate Parcel 77 to Zone 6, a request from the county for the use of Parcel 77 would be required. This request would necessarily include detailed site plans, etc., so that TVA could conduct an appropriate level of environmental review and properly evaluate the request.*

Aggregated Comment 199:

There is ample, suitable land off the reservoir that the county could acquire for recreational use. There is no need to locate a recreational facility on the lake. Lakefront property is too valuable for a recreational facility. If the county wants to provide a new facility, it should be situated in a less-visible location where it would not affect the lake. (Commenters: Dan Aiksnoras, Robert Backstrom, Cary Bainbridge, Gerri Baker, Elizabeth Bates, Rebecca B. Beal, Janet Bentley, Katherine Bever, Michael B. Bever, Paula Brower, Nancy Caulder, Sandy Chapin, J. Thomas Chapin, Bill Cogle, Catherine

Carew-Bednarski, William and Barbara Coffman, William J. and Brenda R. Collins, Tara Degeal, Maria Duben, B. F. Farmer, Pravin Ghandi, Glenda Giles, Max Green, Judy Griffin, Richard and Margaret Guthman, Jim and Pat Halloran, Jean Hamilton, Pamela J. Hitchcock, Karen Holmes, Ken Holmes, James Ingram, William B. Johnson, Deborah Kalish, Joan King, Pam Kirk, Janet Kowalsky, Steve A. Massell, Eileen Millard, Duane F. and Jean G. Miller, Jeanne Minichiello, Jerry and Renee Montrose, Ed and Ellen Moore, Jack and Suzanne Morlen, Phyllis and Berno Pascen, Elva Paul, Phillip Paul, Hava Preye, E. B. Pulley, Nancy Pulley, Steve and Susan Rice, Jonathan and Stephanie Roberts, Susan Rothblum, Barbara L. Russell, James Sanders, Leonore and Denny Smallridge, Spencer Tunnell, Jeanna Mull Wimpey)

TVA Response: *The allocation of Parcel 77 for Developed Recreation (Zone 6) under Alternative C was in response to a request from Towns County and the City of Hiawassee. This allocation would facilitate the eventual development of recreational facilities. There may indeed be off-reservoir properties that could support a recreational complex. Acquisition of such property would be the responsibility of the City of Hiawassee or Towns County.*

Comment 200: “And why would you, as stewards of taxpayers and TVA land, want to destroy work with ALL residents to solve the problem of ballfields, then the youth would get needed ballfields. Has a land search committee (including lake property owners) been formed? Has fund raising been formed? Has flood plain land been investigated? Has national forest land been explored? Has acquiring land that does not destroy quality of life and property values of Towns County residents been explored?”
(Commenters: Jim and Donis Hendry)

TVA Response: *One of the purposes of the Mountain Reservoirs Land Management Plan is to identify properties that are suitable for and capable of specific types of future land uses. Local lake property owners have provided much input in this process. Potential effects to floodplains along Chatuge Reservoir are described in Section 3.2.6 of the FEIS. Requests for use of National Forest System land should be made to the U.S. Forest Service. At this time, TVA has no plans to acquire lands for recreational uses on behalf of the City of Hiawassee or Towns County. The construction of ball fields or other recreational facilities would be the responsibility of the county or the city, and local government would be responsible for initiating any search committees and for pursuing the necessary funding.*

Aggregated Comment 201:

Towns County does not need a 66 acre sports complex. Currently, many of the ball fields and other recreational facilities around the county are under-utilized. Something this large is not needed. (Commenters: J. C. Berrong, Russ Cagle, Donald K Carew, Nancy Caulder, J. Thomas Chapin, Sandy Chapin, William J. and Brenda R. Collins, Michael Derby, Jim Duke, Herbert S. Gatch, Richard Griffin, Judy Griffin, Terry Harrington, J.D. Heer, Gail Herring, Matthew Humphreys, Nancy Johnson, William B. Johnson, Karen A. Kopec, Jeanne Minichiello, William J. Pierson, Jaime Pierson,,Petition #2, Bill Preye, Mark Ratchford, Barth Smith, Kenneth A. and Lorraine Sue Turner)

TVA Response: *Because of the interest expressed by Towns County and the City of Hiawassee, TVA assumes, at least for the purpose of this land planning*

process, that there is need for additional recreational opportunities, such as ball fields, in the area. However, TVA has not received a formal request from the county or the city. Additionally, please note that Parcel 77 is allocated to Zone 4 (Natural Resource Conservation) under TVA's preferred Alternative D.

Aggregated Comment 202:

Parcel 77 is not a good location for a recreational facility because it is located too far away from the downtown area of Hiawassee. A closer site (preferably one not on the reservoir) would be a better location for a sports complex. (Commenters: Nancy Caulder, J. Thomas Chapin, William J. and Brenda R. Collins, B. F. Farmer, William B. Johnson, Nancy Johnson, Petition #2, Maureen Thompson)

TVA Response: *Comment noted. TVA's proposed allocation of Parcel 77 for recreational uses under Alternative C was in response to a request by Towns County and the City of Hiawassee. There may be other closer locations for a sports complex, but these most likely would be on private land.*

Aggregated Comment 203:

Towns County does not appear to have the financial resources to develop, staff, and maintain a large sports complex on Parcel 77. The county might resort to sub-leasing to commercial operators to fund the project. (Commenters: Richard Griffin, Bill Herold, Mary S. Miller, Barth Smith)

TVA Response: *Questions concerning the availability of funding for local recreational programs should be addressed to the appropriate county or city government. Any request for the use of Parcel 77 must conform to the descriptions provided in Table 2-1.*

Aggregated Comment 204:

TVA should not consider allowing Towns County to develop Parcel 77. The county has not demonstrated good environmental stewardship in managing Chatuge Woods Campground. (Commenters: William Blumreich III, J. Thomas Chapin, Nancy Caulder, Sandy Chapin, Michael Derby, Edward Duben, Peter F. Merkle, Petition #2)

TVA Response: *TVA is currently working with the county to resolve safety and other issues at the Chatuge Woods Campground. If TVA were to adopt Alternative C, thereby allocating Parcel 77 for developed recreational use, and if TVA were to entertain and approve a formal request from the county or city for the use of Parcel 77, the resulting land use agreement would likely contain stipulations concerning the operations and the nature of the proposed facilities.*

Aggregated Comment 205:

If Parcel 77 is changed from Zone 4 to Zone 6 then a commercial development such as marinas, lodges, restaurants, and amphitheatres can be built on the property. Additional commercial ventures on the lakefront are not needed. (Commenters: William J. and Brenda R. Collins, Maria Duben, Ed and Ellen Moore, Mark Ratchford, Wiley Thomas, Spencer Tunnell, Kenneth A. and Lorraine Sue Turner)

TVA Response: *If Parcel 77 were allocated to Zone 6, TVA could entertain requests from local governments or private entities for use of the parcel for recreational purposes. In such requests, the proposed use must conform to the*

definition of Zone 6 provided in Table 2-1 of the FEIS. New proposals for commercial recreational development would be subject to TVA's "phased" review process, under which the applicant must provide a feasibility study demonstrating the economic viability of the proposed development. In addition, TVA would require a description of the proposed use, including facilities and plans, in any request. Requests would be subject to environmental review and approval by TVA. Land use agreements would likely be subject to stipulations describing allowable uses.

TVA Policy

Comment 206: "I was recently forwarded a copy of a letter that had been sent to you by Mr. Duben regarding a planned development at Lake Chatuge where I own property. Is it true that you are planning to allow this as the letter states? I am very disturbed that as steward of this land that you would be approving of this. Government entities have the luxury of not having to cater to the whims of the market and doing whatever the market will bear. My understanding is that this is not something that has been requested by the populace and that similar developments have not been maintained. My home in the Atlanta area abuts Lake Lanier where the Corps of Engineers has done an abominable job of maintaining the habitat and pretty well destroyed a 4 billion dollar recreation industry." (Commenter: Richard LaPlante)

TVA Response: *All of the changes in zone allocations under Alternative C were developed in response to proposals received during the scoping process. An allocation of a property for a potential use does not constitute a commitment of that property to that use. Rather, such an allocation indicates that the property is capable of supporting and may be suitable for that particular use. If TVA were to allocate Parcel 77 to Zone 6, any requests for recreational use would be subject to additional environmental review prior to TVA issuing approval for the requested use.*

Comment 207: "In my humble opinion, transferring Parcel #77's 66 acres to Towns County for a Sports Complex is not in accordance with the above policy or a wise use of this land for the following reasons: 1. Towns County does not need 66 acres to have a Sports Complex! For example, the City Council of Sandy Springs, Georgia just approved in August an 8 acre track to be developed as an Athletics Complex. The 8 acres will include an administrative building, a combined football and soccer field, seating for 400 people, and tennis courts. 2. Towns County does not have the financial resources to develop, build, staff, and maintain a 66 acre Sports Complex without resorting to sub-leasing some of the 66 acres to private commercial business as they did with Shoney's and the Ramada Motel in Parcels #28 and #29. This sub-leasing would be in violation of TVA policy ('TVA shall not allocate lands for retail or other non-industrial commercial use or dispose of reservoir properties for such use'). 3. Of the total 1766.5 TVA acres in the Chatuge Reservoir, 414.2 acres or 23.4% are already designated as Zone 6- Developed Recreation. It seems reasonable that out of these 414.2 acres, 10 to 15 acres could be found for a Sports Complex rather than spoil 66 pristine acres." (Commenter: Barth Smith)

TVA Response: *The allocation of Parcel 77 to Zone 6 (Developed Recreation) under Alternative C was in response to a request by the City of Hiawassee and Towns County. If Alternative C were adopted, TVA could entertain requests for*

use of Parcel 77 for developed recreation. Determining the need for additional public recreation facilities and the financing of such facilities is a matter for the county and the city to determine.

The leasing or granting of limited easements over land for developing commercial recreation facilities or public recreation is consistent with the TVA Land Policy. "Retail" use refers to retail (commercial) stores on Zone 5 (Industrial), which is not permitted on TVA lands. Lodging, restaurants, and small 'bait shops' are permitted on Zone 6 (Developed Recreation) for the convenience of the users. The uses of land allocated for Developed Recreation must conform to the definition of Zone 6 provided in Table 2-1. Under the preferred alternative, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation). This allocation will support dispersed recreation uses.

Comment 208: "Parcel 77 We have mixed feelings about the proposed change in designation from Resource Conservation to Developed Recreation. We understand and support the need for county parks and sports fields. However, we have reservations as to the development plans and management. We would ask TVA to perhaps work with Towns County and require detailed plans on how the land will be developed, where lights will be located, how the lake will be protected from runoff or other possible problems, buffer zones, tree removal, etc." (Commenter: Mark and Lindey Fitzgerald)

TVA Response: *A request from the county concerning use or transfer of Parcel 77 for recreational purposes would be required to contain detailed plans and drawings, and the request would be subject to environmental review and approval by TVA. No specific request has been received.*

Comment 209: "It doesn't make sense to me. I was told Towns County is being given the property. But with one way in and one way out, a peninsula on the lake, miles and miles from town, I don't understand the motivation. The property is very hilly which would mean a lot of grading and a lot of silt in the lake and it won't ever be convenient to get to. It makes no sense. A lot of cost to make a ball park out of that property, if that's truly what they plan to do. Once the zoning is changed, a commercial marina could be put in there. Could be. That's what I was told by the TVA. But they'd have to first change the zoning and it's a lot easier to get the zoning changed for a ball park than something commercial." (Commenter: Wiley Thomas)

TVA Response: *Under Alternative C, TVA would allocate Parcel 77 for Developed Recreation. If Alternative C were adopted, then TVA would entertain requests for use of the property for recreational purposes consistent with those types of recreational uses described in Table 2-1. TVA would consider leasing or granting a limited easement for the development of appropriate recreational facilities on Parcel 77. Any specific request concerning the use of the parcel would be afforded additional environmental review and would be subject to approval by TVA. No specific request has been received. Under TVA's preferred Alternative D, Parcel 77 is allocated to Zone 4 (Natural Resource Conservation).*

Comment 210: "The TVA's original intention for condemning and purchasing land was for flood control not development." (Commenter: William J. Pierson)

TVA Response: *Comment noted. Flood control and protection were important considerations in TVA's acquisition of project properties, but TVA's mission also includes natural resource stewardship, economic development, and the production of reliable, affordable electric power. As stated in Section 1.1 of the FEIS, many of the properties held by TVA are important regional resources. Currently, many parks, recreation areas, wildlife refuges, and other public amenities are on lands that TVA has made available to other federal agencies and to state or local agencies and governments. TVA lands have also been a catalyst for public and private economic development.*

Public Involvement

Comment 211: "In straightforward dialog with the citizens, the Commissioner has the opportunity to set out a specific proposal for any potential lease of parcel 77 from the TVA. That proposal needs to be known and agreed with by the citizens well before the County makes application, or requests classification change in parcel 77. If it is to be a public recreation park, the public needs input early on. We know that the County wants more soccer and baseball fields within easy access of the citizens. It seems obvious to me that the County should minimally be willing to discuss plans and proposals with the citizens, and GIVE GUARANTEES as to what will be done, what will be allowed, and how rules will be enforced if a new lease is to be issued if a reclassification of the parcel is allowed." (Commenter: William Blumreich III)

TVA Response: *Towns County is responsible for the decision whether to involve the public before submitting a proposal to TVA. At the time the DEIS and FEIS were prepared, no detailed plans for a recreation facility on Parcel 77 had been received by TVA. However, Towns County and the City of Hiwassee indicated an interest in locating such a facility on the parcel. This interest was the basis of TVA's proposed allocation of Parcel 77 for Developed Recreation under Alternative C. If Alternative C were to be adopted, TVA would entertain requests from responsible parties for recreational uses of Parcel 77. TVA would require detailed plans in any formal request for recreational use of Parcel 77. Such a request would be subject to TVA Board approval, and TVA would conduct an appropriate level of environmental review prior to a decision by TVA. TVA could also involve the public in the review of such a request. Under TVA's preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 212: "Every lake resident I have spoken to is almost alarmed about development of parcel 77 for a multiple field sports complex with ballfields, lighting, parking lots, etc. Towns County has not included the lake residents in meetings to explore the need of a sports complex. We now learn the county has decided on parcel 77. Lake residents want a voice. The TVA has leased for many years the Woods Grove campground. TVA and Towns County have been terrible stewards of this piece of land. This is unlike the campgrounds in Clay County which are no eyesore and are well run. Re: Jack Rabbit. Woods Grove is called by many 'Towns Counties slum.' Why would we, as tax payers, want to have any TVA land leased to Towns County with Woods Grove as example? And why would you, as stewards of tax payers and TVA land, want to put a blight on Lake Chatuge, which is a Georgia state treasure?" (Commenters: Jim and Donis Hendry)

TVA Response: *Towns County is responsible for the decision whether to involve the public before submitting a proposal to TVA. At the time the DEIS and FEIS were prepared, no detailed plans for a recreation facility on Parcel 77 had been received by TVA. However, Towns County and the City of Hiwassee indicated an interest in locating such a facility on the parcel. This interest was the basis of TVA's proposed allocation of Parcel 77 for Developed Recreation under Alternative C. If Alternative C were to be adopted, TVA would entertain requests from responsible parties for recreational uses of Parcel 77. TVA would require detailed plans in any formal request for recreational use of Parcel 77. Such a request would be subject to TVA Board approval, and TVA would conduct an environmental review prior to any decision. TVA could also involve the public in the review of such a request. Under TVA's preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 213: "The TVA and its Board of Directors are not conforming to deferral laws concerning public notice and public participation regarding the Parcel 77 issue in Hiwassee, GA. Please advise the TVA board and local Congressman, Mr. Paul Broun, that local taxpayers intend to file suit to prevent an amended land-use at Parcel 77, because of this and other issues." (Commenter: Matthew Humphreys)

TVA Response: *Comment noted. In accordance with the National Environmental Policy Act and other relevant laws, and as detailed in FEIS Sections 1.5 and 1.6, TVA has solicited much public input and involvement in the preparation of this EIS.*

Aggregated Comment 214:

The public was not notified about the proposed zone changing of Parcel 77. Due to lack of notification, the review of Parcel 77 should be postponed to allow Towns County to prepare a detailed plan. TVA did not conform to laws regarding public notice. (Commenters: Carrie Carew, Scott Carew, Richard D Climo, Natasha Darwent, Matthew Humphreys, Nancy Johnson, William B. Johnson, Petition #2, Maureen Thompson)

TVA Response: *Allocation of a property for potential recreational use does not constitute a commitment of that property to that use. Rather, such an allocation indicates that the property is capable of supporting and may be suitable for that use. If TVA were to allocate Parcel 77 to Zone 6, TVA could entertain future requests for recreational uses on Parcel 77. At this time, TVA has not received a detailed plan or a formal application from Towns County for recreational use on Parcel 77. Towns County requested a Zone 6 allocation, which would allow formal applications with specific plan details to be submitted for developed recreational use on that property. TVA would review any formal application submitted and would conduct an appropriate level of environmental review prior to a decision by TVA regarding the potential recreational use of Parcel 77. Public notification and involvement would be a part of the environmental review process. Please see FEIS Sections 1.5 and 1.6 for a description of public notice of and involvement in the allocation process.*

Visual and Aesthetic Quality*Aggregated Comment 215:*

There is trash along the lakeshore, especially on Parcel 77. (Commenters: Herbert and Carolyn Gatch, Terry Harrington, James Ingram, Karen A. Kopec)

TVA Response: *Unfortunately, litter, trash, and other land abuses are a widespread and persistent consequence of allowing public use of public lands. TVA does not use Parcel 77 for a dumping site, nor does Towns County.*

Aggregated Comment 216:

Development of Parcel 77, especially a sports complex, will increase noise pollution due to the increased number of people, traffic, concerts, and loud sports activities. This is not in keeping with the tranquil nature of the area. (Commenters: Dan Aiksnoras, Mr. and Mrs. Jon Anderson, Brenda Arnett, Casey Barnes, Erin Barnes, Graham and Phyllis Bell, Mr. and Mrs. Bruce R. Bennett, Catherine Carew-Bednarski, Michael Bever, Paula Brower, Russ Cagle, Nancy Caulder, J. Thomas Chapin, Sandy Chapin, Bill Cogle, Cynthia Carew Darwent, Tara Degeal, DonnaLee DeMuth, Ross DeMuth, Tucker DeMuth, Ophelia Dickey, Michael Donohue, Paulette Doyeir, Maria Duben, Janet Duke, Jim Duke, Marlene and William C. Duke, Ellen Edwards, David and Deedee England, Robert E. Garbe, Herbert and Carolyn Gatch, Glenda Giles, Richard and Margaret Guthman, Jean Hamilton, David and Barara Hansen, Terry Harrington, Mr. and Mrs. James Hendry, Shamina Henkel, Gail Herring, Pamela J. Hitchcock, Karen Holmes, Ken Holmes, William B. Johnson, Nancy Johnson, Deborah Kalish, Joan King, Gary M. Kopacka, Karen A. Kopec, Melanie Kopp, Janet Kowalsky, Paul and Victoria Lajoie, Margaret Leslie, Ben E. and Peggy I. Lilly, Lane Martin, Eileen Millard, Cameron Miles, Mary Miller, Jeanne Minichiello, Jennifer Myers, Sylvia Neese, Greg Noojin, Rena Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, Elva Paul, Phillip Paul, Ellen Pease, Petition #2, C. Thomas and Shirla Petersen, Bill Preye, Diane Pulley, Eddie Pulley, Beverly Rambo, Robert Rambo, Mark Ratchford, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Steve and Susan Rice, Jerry and Faye Rogers, Thomas A. Romine, Judy Rosasco, Susan Rothblum, Cheryl Russell, Larry and Janice Rutledge, James Sanders, Leonore and Denny Smallridge, Albert Swint, Maureen Thompson, Becky Vashon)

TVA Response: *Comment noted. Potential noise-related effects from the allocation of Parcel 77 for recreational use are described in Section 3.1.11.2 and Section 3.2.11.2 of the FEIS.*

Aggregated Comment 217:

If a sports complex is built on Parcel 77, then the lighting from the fields will have a negative impact on Chatuge Reservoir. Additional nighttime lighting (i.e., "light pollution") will inhibit the ability to watch the stars at night and enjoy nighttime boating. (Commenters: Mr. and Mrs. Jon Anderson, Brenda Arnett, Casey Barnes, Erin Barnes, Graham and Phyllis Bell, Mr. and Mrs. Bruce R. Bennett, Michael Bever, Russ Cagle, Nancy Caulder, J. Thomas Chapin, Sandy Chapin, Bill Cogle, Byron Cooper, Robert H. Cowart, DonnaLee DeMuth, Ross DeMuth, Tucker DeMuth, Ophelia Dickey, Janet Duke, Jim Duke, Michael Donohue, Paulette Doyeir, Ellen Edwards, Sara Ferguson, Glenda Giles, Jim and Donis Hendry, James Hendry, Shamina Henkel, Gail Herring, Karen Holmes, William B. Johnson, Nancy Johnson, Deborah Kalish, Pam Kirk, Joan King, Margaret M. Knight, Gary M. Kopacka, Karen A. Kopec, Janet Kowalsky, Paul and

Victoria Lajoie, Margaret Leslie, Mary Miller, Jack and Suzanne Morlen, Stephen M. Morris, Jennifer Myers, Rena Noojin, Greg Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, Diane Pulley, E. B. Pulley, Eddie Pulley, Susan Rothblum, Ellen Pease, Petition #2, Bill Preye, Beverly Rambo, Robert Rambo, Mark Ratchford, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Steve and Susan Rice, Thomas A. Romine, Jerry and Faye Rogers, Judy Rosasco, Cheryl Russell, James Sanders Leonore Smallridge, Albert Swint, Maureen Thompson, Kenneth A. and Lorraine Sue Turner, Becky Vashon)

TVA Response: *Comment noted. Potential visual effects of the recreational development of Parcel 77 under Alternative C are described in Section 3.2.9.2 of the FEIS. Additional lighting on Parcel 77 could affect viewers within the viewshed (i.e., within the line-of-sight) of the parcel. TVA often requires the installation of directional, or downward-pointing, lighting to reduce excessive nighttime lights as a condition of approval.*

Aggregated Comment 218:

Parcel 77 is in the middle of the lake and is therefore highly visible. Any development of Parcel 77 will degrade the beauty of Lake Chatuge. The quality of its scenic views will be destroyed forever. (Commenters: Dan Aiksnoras, Mr. and Mrs. Jon Anderson, Danielle Aquinas, Brenda Arnett, Robert Backstrom, Cary Bainbridge, Casey Barnes, Erin Barnes, Elizabeth Bates, Graham and Phyllis Bell, Mr. and Mrs. Bruce R. Bennett, Michael Bever, Paula Brower, Russ Cagle, Frances Callen, J. Thomas Chapin, Sandy Chapin, William Coffman, Bill Cogle, William J. and Brenda R. Collins, Tara Degeal, DeMuth, Ross DeMuth, Tucker Demuth, Michael Derby, Ophelia Dickey, Michael Donohue, Paulette Doyeir, Jim Duke, Janet Duke, Ellen Edwards, David and Deedee England, B. F. Farmer, Walter and Marilyn Fuller, Herbert and Carolyn Gatch, Glenda Giles, Claudia Goldberg, DonnaLee Griffin, Richard Griffin, Jim and Pat Halloran, Jean Hamilton, David and Barbara Hansen, Mrs. James H. Hendry, Shamina Henkel, Gail Herring, Karen Holmes, Ken Holmes, Linda Howard, Nancy Johnson, William B. Johnson, Joan King, Margaret M. Knight, Gary M. Kopacka, Paul and Victoria Lajoie, Margaret Lawler, Ben E. and Peggy I. Lilly, Eileen Millard, Mary Miller, Ed and Ellen Moore, Jennifer Myers, Sylvia Neese, Greg Noojin, Rena Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Berno Pascen, Elva Paul, Philip Paul, C. Thomas and Shirla Petersen, Petition #2, Jaime Pierson, Diane Pulley, Eddie Pulley, Phyllis and Beverly Rambo, Robert Rambo, Mark Ratchford, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Jonathan and Stephanie Roberts, Thomas A. Romine, Jerry and Faye Rogers, Judy Rosasco, Barbara Russell, Cheryl Russell, Margaret Arralu S. Russell, James Larry Rutledge, Janice Rutledge, Leonore Smallridge, Richard Storck, Albert Swint, Maureen Thompson, Kenneth A. and Lorraine Sue Turner, Becky Vashon)

TVA Response: *Comment noted. As stated in Section 3.2.9.2 of the FEIS, the allocation of Parcel 77 under Alternative C for developed recreation would cause a reduction of scenic value class, and its aesthetic sense of place would be reduced. Under the preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation) rather than Zone 6 (Developed Recreation).*

Biological Resources

Comment 219: “Parcel 77 on Chatuge Reservoir has a population of butternut and pink lady’s slipper.” (Commenter: Annette Gelbrich)

TVA Response: *Comment noted. This fact was stated in Section 3.2.4.1 of the DEIS.*

Comment 220: “Rare and Protected Species: Columbo Palumbus – Rare Wood Pigeon, Butternut, Pink Lady Slipper (provided pictures of these three species).” (Commenter: Towns and Clay County Taxpayers Association)

TVA Response: *The wood pigeon (Columba palumbus) is the most common pigeon in England and inhabits much of Europe. It is not native to the United States, although some individuals may have been released to the wild. This species is not protected at the federal level or in the state of North Carolina. As noted in Section 3.2.4.1 of the DEIS, Parcel 77 on Chatuge Reservoir contains a population of butternut and pink lady’s slipper. The butternut (Juglans cinerea) is considered a species of “special concern” in Georgia and has a rank of “imperiled” (see Table 3-12). The pink lady’s slipper flower (Cypripedium acaule) is considered “special concern due to commercial exploitation” in Georgia, with a rank of “widespread, abundant, and apparently secure” (see Table 3-12). Neither of these plant species is listed at the federal level. Information about the butternut tree and the pink lady’s slipper is provided in Section 3.2.4.1 of the FEIS.*

Comment 221: “In addition and most importantly, Parcel 78 is adjacent to Parcel 77. In the summertime there is a bridge of water that isolates parcel 78. After July 4, when the water level is lowered there is then a small land bridge. There are still bear, deer, and birds including raptors, woodpeckers, nesting geese and ducks, owls, and others that are indigenous to Parcels 77 and 78. Ten years ago, the TVA set up fish benches on the south and southwestern side of Parcel 77 to help improve the habitat of fishes in the lake. To change the zoning, changes the very ecology of these two parcels in an exponential way. I have seen bald eagles perched on these parcels. Pileated woodpeckers and Loon couples also frequent our property across from Parcel 77 (and 78). Unfortunately, I haven’t seen these birds as frequently or when casual campers and vehicles are on parcel 77 property.” (Commenter: Jeanne Kopacka)

TVA Response: *Comment noted.*

Comment 222: “Parcel 77 - We feel very strongly that this area should be left as it is. It is one of the few wilderness areas left. It is a sanctuary for many wild animals. The large woodpeckers have a haven there, and they are almost extinct. Our property is bordered on two sides by TVA property, and we have always felt secure that you would never sell the property. We have a little cottage there which is our getaway. We appeal to you, don’t spoil it for us or for the wild animals.” (Commenter: Don and Irma Selman)

TVA Response: *Comment noted. We assume that the comment is about the pileated woodpecker (Dryocopus pileatus). This woodpecker is relatively common in areas of mature hardwoods over much of the eastern United States. TVA is neither aware of nor does it have any records of any large species of woodpecker inhabiting the Chatuge Reservoir area that is nearing extinction.*

Aggregated Comment 223:

Parcel 77 contains habitat for a variety of wildlife, including several endangered species. Bald Eagles have been regularly spotted on this parcel. Development of Parcel 77 for recreational use would have negative effects on wildlife and would destroy wildlife habitats. (Commenters: Mr. and Mrs. Jon Anderson, Brenda Arnett, Casey Barnes, Erin Barnes, Graham and Phyllis Bell, Michael Bever, Russ Cagle, Sandy Chapin, Bill Cogle, Cynthia Darwent, Edward L. Dedmon, Jo-Ann R. Dedmon, DonnaLee DeMuth, Ross DeMuth, Tucker DeMuth, Ophelia Dickey, Michael Donohue, Paulette Doyeir, Edward Duben, Janet Duke, Jim Duke, Ellen Edwards, David and Deedee England, Glenda Giles, Judy Griffin, James Hendry, Shamina Henkel, Matthew Humphreys, Joan King, Pam Kirk, Margaret M. Knight, C4C Ben Kopacka, Gary M. Kopacka, Karen A. Kopec, Janet Kowalsky, Paul and Victoria Lajoie, Margaret Leslie, Ben Lilly Jr., Ben E. and Peggy I. Lilly, Mary Miller, Carol Moffit, Ed and Ellen Moore, Jennifer Myers, Sylvia Neese, Greg Noojin, Rena Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, C. Thomas and Shirla Petersen, William Edward Preye, Diane Pulley, Eddie Pulley, Beverly Rambo, Robert Rambo, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Faye Rogers, Jerry Rogers, Thomas A. Romine, Judy Rosasco, Cheryl Russell, Leonore Smallridge, Albert Swint, Becky Vashon)

TVA Response: *Potential effects to threatened and endangered species and their habitats on Chatuge Reservoir under all of the alternatives are described in Section 3.2.4.2 of the FEIS. Under Alternatives B and D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation), which would preclude development. Under Alternative C, Parcel 77 would be allocated to Zone 6 (Developed Recreation). Development of recreational facilities on Parcel 77 under Alternative C would affect the populations of butternut trees and pink lady's slipper flowers on this parcel. Both of these species are state-listed plants. Excavation would likely destroy endangered plants that are disturbed. Excavation could destroy some endangered wildlife, depending on the ability of the affected species to relocate to nearby suitable habitats.*

The bald eagle was removed from the federal list of endangered species in 2007; however, it is listed as endangered in Georgia and threatened in North Carolina. It is also afforded protection under the Bald and Golden Eagle Protection Act of 1940. Although many forested parcels along Chatuge Reservoir provide suitable nesting habitat for bald eagles, no nesting eagles have been documented on Chatuge. Development of Parcel 77 for recreational purposes, especially the possible clearing of forested shoreline, could result in a loss of perching and nesting habitat for bald eagles.

Aggregated Comment 224:

Development of Parcel 77 for recreational use (e.g., a sports complex) will displace local wildlife and their habitats. Parcel 77 should be left in its natural state. (Commenters: Dan Aiksnoras, Val Aldrop, Mr. and Mrs. Jon Anderson, Brenda Arnett, Cary Bainbridge, Casey Barnes, Erin Barnes, Graham and Phyllis Bell, Michael Bever, Paula Brower, Russ Cagle, Carrie Carew, Donald K Carew, Scott Carew, Sandy Chapin, Richard D Climo, Bill Cogle, Cynthia Carew Darwent, Natasha Darwent, Edward L. Dedmon, Jo-Ann R. Dedmon, Tara Degeal, DonnaLee DeMuth, Ross DeMuth, Tucker DeMuth, Ophelia Dickey, Michael Donohue, Paulette Doyeir, Edward Duben, Maria Duben, Janet Duke, Jim Duke, Ellen Edwards, David and Deedee England, Greg and Anne Eickwort,

Sara Ferguson, Walter and Marilyn Fuller, Carolyn Gatch, Herbert S. Gatch, Glenda Giles, Judy Griffin, Richard Griffin, Jean Hamilton, David and Barbara Hansen, James Hendry, Shamina Henkel, Pamela J. Hitchcock, Karen Holmes, Ken Holmes, Nancy Johnson, William B. Johnson, Joan King, Pam Kirk, Margaret M. Knight, C4C Ben Kopacka, Gary M. Kopacka, Jeanne Kopacka, Karen A. Kopec, Janet Kowalsky, Margaret Lawler, Margaret Leslie, Ben E. and Peggy I. Lilly, Eileen Millard, Mary S. Miller, Carol Moffit, Ed and Ellen Moore, Jennifer Myers, Sylvia Neese, Greg Noojin, Rena Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Philip Paul, Phyllis and Berno Pascen, Petition #2, C. Thomas and Shirla Petersen, William Edward Preye, Diane Pulley, Eddie Pulley, Beverly Rambo, Robert Rambo, Mark Ratchford, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Jonathan and Stephanie Roberts, Thomas A. Romine, Jerry and Faye Rogers, Judy Rosasco, Cheryl Russell, Larry and Janice Rutledge, Don and Irma Selman, Leonore Smallridge, Steve and Kathy Stamey, Richard Storck, Albert Swint, Maureen Thompson, Kenneth A. and Lorraine Sue Turner, unknown, Becky Vashon)

TVA Response: *Activities related to the development of a large-scale recreational facility on Parcel 77 would indeed displace the wildlife on the site, as forested areas would likely be cleared. However, potential effects to wildlife on Parcel 77 expected under Alternative C would be minor (see Section 3.2.3.2.2 of the FEIS). Under the Blended Alternative, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Aggregated Comment 225:

Clearing 60-plus acres of Parcel 77 for a recreational development will destroy pristine forested land and wildlife habitats. (Commenters: Donald K Carew, J. Thomas Chapin, Richard D Climo, Edward L. Dedmon, Jo-Ann R. Dedmon, Maria Duben, B. F. Farmer, Karen A. Kopec, Jim and Pat Halloran, Lisa Humphreys, Ellen Pease, Mark Ratchford, Cheryl Russell, Don and Irma Selman)

TVA Response: *Parcel 77 is an upland hardwood area. If Parcel 77 were developed for recreational use under Alternative C, necessary clearing would likely eliminate a large portion of the forested area. Potential effects to terrestrial ecology expected under Alternative C would be minor (see FEIS Sections 3.2.3.1.2 and 3.2.4.2).*

Cultural Resources

Comment 226: “Has it been mentioned that there is an Indian grave site on Parcel 77?” (Commenter: Mary S. Miller)

TVA Response: *TVA is aware of archaeological sites identified on Parcel 77 because an archaeological survey was performed. However, TVA’s archaeological consultant did not identify human remains anywhere within the parcel. TVA determined that none of the archaeological sites on this parcel are significant.*

Comment 227: “Small pieces of Indian pottery have been seen where a large road has been constructed through Parcel 77 to the lake.” (Commenter: Herbert S. Gatch)

TVA Response: *TVA is aware of archaeological sites identified on Parcel 77. However, none of the sites on this parcel were determined to be significant. The commenter is encouraged to provide more information on the location of the Indian pottery so that TVA Cultural Resources staff may investigate further.*

Comment 228: “The loss of proven Native American cultural sites on Parcel 77 is not keeping with the TVA stewardship doctrines.” (Commenter: Steve Massell)

TVA Response: *As part of TVA’s stewardship responsibilities, TVA avoids impacts to significant archaeological sites where it is feasible to do so. If sites cannot be avoided, TVA follows a process to mitigate the impacts. This process normally involves scientific archaeological excavations. TVA determined that none of the archaeological sites on Parcel 77 are significant.*

Water Quality

Comment 229: “Although the specifics of various recreational proposals for Chatuge Parcel No. 52 and No. 77 are not clear, HRWC submits similar concerns with TVA’s Zone 6 category – Developed Recreation. Zone 6 encompasses everything from greenway trails and boat ramps to full-scale commercial marina and campgrounds. As is well documented in the CWAP, Lake Chatuge needs wooded shoreline areas. It needs land where water can filter through vegetation and soil into the ground. Although Towns County may need more recreational facilities for its youth and the City of Hiwassee may desire a waterfront park, HRWC’s responsibility is to facilitate water quality improvements throughout the upper Hiwassee River watershed. The CWAP tells us that TVA’s management of these lands for natural resource protection (Zone 4) is the best designation for the protection of water quality and improvement of Lake Chatuge’s ecological health.” (Commenter: Gilbert S. Nicolson)

TVA Response: *Comment noted. We agree that land uses on Zone 4 (Natural Resource Conservation) parcels likely pose a very low potential for adverse effects to water quality. Regardless of the zone allocation, TVA would require the implementation of appropriate measures, including best management practices, to reduce the potential for erosion, sedimentation, and adverse effects to water quality as conditions of approval for a land use.*

Comment 230: “The preservation of water quality in the reservoir is crucial to the recreation, economic development, and beauty of this region. A high intensity recreational development will increase the water run-off from impervious surfaces, produce grading and clearing, reduce shade and needed lake oxygen, and produce additional impacts on the water quality of the reservoir. The existing low-intensity recreational use positively impacts the water quality, improving recreational opportunities. Without a more detailed plan for the proposed ball field complex, the TVA cannot adequately review the proposed Alternative C for water quality impacts.” (Commenters: William B. Johnson, Nancy Johnson, Petition #2, Maureen Thompson)

TVA Response: *The allocation of Parcel 77 on Chatuge Reservoir to Zone 6 under Alternative C was in response to a request by Towns County and the City of Hiwassee. These two entities have expressed an interest in using Parcel 77 for recreational purposes. However, TVA has not received any detailed plans for such facilities. As explained in Section 3.2.10.2 of the FEIS, the allocation of*

Parcel 77 to Zone 6 (Developed Recreation) would increase the potential for adverse effects to water quality. However, the extent of any potential impacts would depend on the specific details of possible future development. If TVA were to adopt Alternative C and allocate Parcel 77 to Zone 6, requests for use of the parcel, accompanied by detailed plans, would be entertained. Such a request would be subject to approval by TVA, and additional environmental review would be completed prior to a decision on the request. As a condition of approval, TVA would likely impose the use of appropriate measures to reduce the potential for adverse effects to local water quality.

Comment 231: “In fact, on parcel 77, the city or county has already cleared land and put down a gravel road in anticipation of the change in zoning while a TVA sign covered with mud protecting the property remains in place. The runoff is already evident and we are in a drought with only a few days of rainfall this summer. I can only imagine the cumulative negative environmental impact that further clearing of this property will cause.” (Commenter: Jeanne Kopacka)

TVA Response: *Comment noted. Section 3.2.10.2 of the FEIS describes the impacts to water quality expected under all of the alternatives.*

Aggregated Comment 232:

Ten years ago, TVA set up fish benches on the south and southwestern side of Parcel 77. Additionally, the trees that surround the coves around Parcel 77 provide unique fish habitat. Any development on Parcel 77 will destroy the fish benches and unique fish habitat. (Commenters: C4C Ben Kopacka, Jeanne Kopacka)

TVA Response: *The proposed zone allocation would not affect the fish benches. Any fish benches set up 10 years ago have most likely deteriorated. TVA has no current plans, nor is TVA aware of any state agency plans, to replace fish benches in the vicinity of Parcel 77. The change in zone allocation would not affect the fish benches or any unique fish habitat.*

Comment 233: “The white bass of the lake are all but extinct in this lake as are several other species. If development on Parcel 77 continues, more wildlife would be greatly affected.” (Commenter: Judy Griffin)

TVA Response: *Comment noted. Potential impacts to wildlife from adopting Alternative C are discussed in FEIS Section 3.2.3.2.2.*

Comment 234 “A ball field will add more chemicals to the lake due to runoff and eventually kill the fish and the lake.” (Commenter: Deborah Kalish)

TVA Response: *Potential effects to aquatic life from adopting Alternative C are minor (see Section 3.2.10.2 of the FEIS).*

Comment 235: “As a teen in high school, I played on our Soccer Team. It is wonderful sport for young people, but it does not belong on Parcel 77 or any other island on Lake Chatuge at such expense to destroy pristine forested land, aquatic ecology, wildlife domains, and greatly needed tourism income from people who need to come to Lake Chatuge for a breather from stressful living in the big cities.” (Commenter: Cheryl Russell)

TVA Response: *Comment noted.*

Comment 236: “Do not let Towns County change the zoning on Parcel 77. This will cause more pollution, waste of virgin forest. Destruction of animal and plant homes when their habit is wiped out. Have you been on that parcel lately. This is garbage in various areas.” (Commenter: Karen A. Kopec)

TVA Response: *TVA is considering allocating (i.e., “zoning”) Parcel 77 to Zone 6 (Developed Recreation) under Alternative C. This allocation is in response to a request from Towns County and the City of Hiawasse. Towns County does not own Parcel 77 and has no jurisdiction in zoning this property. Similarly, TVA has no authority over Towns County’s zoning actions. Potential effects to plant and wildlife communities resulting from the adoption of Alternative C are discussed in FEIS Section 3.2.3.*

Aggregated Comment 237:

Parcel 77 should remain in its current state. Reallocation of Parcel 77 will cause mud, sediment, trash, nutrient runoff, and other pollution to enter the lake. This will cause further degradation of water quality. (Commenters: Val Aldrop, Marlene and William C. Duke, Herbert and Carolyn Gatch, Annette Gelbrich, Ken Halron, David and Barbara Hansen, Terry Harrington, Karen Holmes, Linda Howard, Matthew Humphreys, Karen A. Kopec, Elva Paul, Jaime Pierson)

TVA Response: *Potential adverse effects to water quality from the allocation of Parcel 77 for Developed Recreation under Alternative C are described in Section 3.2.10.2 of the FEIS.*

Comment 238: “I have been extremely disappointed in TVA for allowing the water quality of the lake to degrade over the years. For TVA to allow active high density use in the middle of this lake should be in total disregard to Authority's directive given to it by Congress.” (Commenter: Bryon Cooper)

TVA Response: *As stated in Section 3.2.10.1, the water quality in Chatuge Reservoir has declined over the last several years. These declines are due to a variety of reasons, including residential development and nutrient runoff from the watershed in general. TVA cannot control activities on private lands in the watershed. However, TVA actively cooperates with private and public organizations to improve water quality. Chatuge Reservoir is managed as a multipurpose reservoir.*

Aggregated Comment 239:

The water quality of Chatuge Reservoir has declined. Any development on Parcel 77 will result in the decrease of water quality of Chatuge Reservoir. Impervious surfaces such as sport fields cause much more runoff than forested land. Site preparation and construction will cause sediment to enter the lake. Chemicals sprayed on ball fields would cause water pollution. There will be increased boating in the area, which could cause bank erosion. (Commenters: Marcia Abrams, Dan Aiksnoras, Mr. and Mrs. Jon Anderson, Brenda Arnett, Casey Barnes, Erin Barnes, Cathy Barton, Graham and Phyllis Bell, Katherine Bever, Michael B. Bever, May May Bickes, Paula Brower, Russ Cagle, Nancy Caulder, J. Thomas Chapin, Sandy Chapin, William and Barbara Coffman, Bill Cogle, Edward L. Dedmon, Tara Degeal, DonnaLee DeMuth, Ross DeMuth, Tucker

DeMuth, Ophelia Dickey, Paulette Doyeir, Michael Donohue, Edward Duben, Janet Duke, Jim Duke, Ellen Edwards, Herbert S. Gatch, Annette Gelbrich, Pravin Ghandi, Judy Griffin, Richard and Margaret Guthman, Jean Hamilton, David and Barara Hansen, Terry Harrington, Mrs. James H. Hendry, Shamina Henkel, Bill Herold, Ken Holmes, Lisa Humphreys, Matthew Humphreys, William B. Johnson, Deborah Kalish, Margaret M. Knight, Gary M. Kopacka, Karen A. Kopec, Paul and Victoria Lajoie, Rick LaPlante, Eileen Millard, Mary S. Miller, Ed and Ellen Moore, Jennifer Myers, Sylvia Neese, Greg Noojin, Rena Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, Phillip Paul, William J. Pierson, Bill Preye, Hava Preye, Diane Pulley, Eddie Pulley, Beverly Rambo, Robert Rambo, Mark Ratchford, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Jerry and Faye Rogers, Thomas A. Romine, Judy Rosasco, Susan Rothblum, Cheryl Russell, Leonore Smallridge, Gerry Smith, Albert Swint, Kenneth A. and Lorraine Sue Turner, Becky Vashon, Edward Wesson)

TVA Response: *As stated in Section 3.2.10.2, land clearing and grading associated with a large-scale development have the potential to negatively affect water quality. This potential depends in large part on the nature of the development, the environmental safeguards employed during construction, and how the facility is operated. Should Alternative C be adopted and Parcel 77 be allocated to Zone 6, TVA could entertain requests for recreational uses of Parcel 77. Such requests are subject to TVA approval pending the completion of an environmental review. TVA could condition its approval on the implementation of appropriate measures (e.g., best management practices and best construction practices) to control erosion during construction and operation of the proposed facility. If boating were a component of the request, then TVA would consider this in the environmental review. Under TVA's preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 240: "Parcel 77 is included in Sub-Watersheds '04' and '0301' and is considered a 'High Priority' for remedial action as it ranks '4' (most serious level) for Total Phosphorous, Total Nitrogen and Total Suspended Solids. While the conclusions may be regarded as a computer model based on IPSI analysis, the message should be clear, the TVA parcels that are located in the center of the lake (Parcels 72, 74, 77 and 78) are strategically important for the preservation of water quality in Lake Chatuge. Changing land usage on Parcel 77 would be a disastrous first step in the decline of a lake that is already near the tipping point in water quality. The degradation and/or deterioration of TVA lands and shoreline areas currently under easement by Towns County should be the first indication that Alternative C is unacceptable under the current conditions of the lake ecological health ratings." (Commenter: J. Thomas Chapin)

TVA Response: *Comment noted. Potential effects to water quality in Chatuge Reservoir under Alternative C are described in Section 3.2.10.2.*

Aggregated Comment 241:

The operation of large recreational facilities on Parcel 77 would involve the application of chemicals, including nitrate and phosphate fertilizers. These can cause water quality problems in Chatuge Reservoir, as levels are already high. (Commenters: Robert Backstrom, Katherine Bever, Nancy Caulder, Mattie Chapin, Sandy Chapin, Michael Derby, Pravin Ghandi, Peter F. Merkle, William Edward Preye)

TVA Response: *Potential effects to water quality in Chatuge Reservoir from the adoption of Alternative C are described in Section 3.2.10.2 of the EIS.*

Vehicular Traffic

Comment 242: “Why should we put a commercial venture right near the middle of the lake? It does form a blight on your magnificent creation. If it’s going to be well used, which I doubt, build it off Rt. 76 rather than on a two-lane twisting road that is serviced from the north by a one-lane bridge. It is also off the beaten track, and somewhere closer to downtown makes sense.” (Commenters: William J. and Brenda R. Collins)

TVA Response: *Comment noted.*

Comment 243: “I would bet that there have been no studies done regarding the impact of developing Parcel 77 or DOT studies regarding the traffic count on Mull Road.” (Commenter: William J. Pierson)

TVA Response: *The potential need for upgrades to Mull Road is mentioned in Section 3.2.12.2 of the FEIS.*

Aggregated Comment 244:

Development of a sports complex on Parcel 77 will increase traffic and congestion in the Chatuge area. (Commenters: Mr. and Mrs. Jon Anderson, Brenda Arnett, Casey Barnes, Erin Barnes, Michael Bever, Graham and Phyllis Bell, Russ Cagle, Donald K Carew, Nancy Caulder, J. Thomas Chapin, Sandy Chapin, Jerry Childress, Bill Coglie, DonnaLee DeMuth, Ophelia Dickey, Ross DeMuth, Tucker DeMuth, Paulette Doyeir, Maria Duben, Janet Duke, Jim Duke, Marlene and William C. Duke, Michael Donohue, J. D. Edge, Glenda Giles, Judy Griffin, James Hendry, Shamina Henkel, Linda Howard, Nancy Johnson, William B. Johnson, Pam Kirk, Margaret M. Knight, Karen A. Kopec, Gary M. Kopacka, Paul and Victoria Lajoie, Margaret Leslie, Mary Miller, Jennifer Myers, Greg Noojin, Rena Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Petition #2, E. B Pulley, Mark Ratchford, Donald A. Reaser, Susan J. Reaser, Steve and Susan Rice, Thomas A. Romine, Judy Rosasco, Cheryl Russell, James Sanders, Leonore Smallridge, William S. Southern, Albert Swint, Becky Vashon)

TVA Response: *If TVA were to adopt Alternative C, thereby allocating Parcel 77 to Zone 6 (Developed Recreation), the location of a sports complex on this parcel would likely increase local traffic somewhat, especially in the summer months. However, the extent and the amount of increase cannot be assessed accurately at this time because the specific details of the facility are not known. TVA has not received a formal request from the city or the county for the use of Parcel 77. Under TVA’s preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Aggregated Comment 245:

Any development on Parcel 77, especially an athletic complex, will increase traffic on Mull Road. Mull Road can not support the heavy traffic loads that are associated with athletic sports complex operations. (Commenters: Danielle Aquinas, Mr. and Mrs. Bruce R. Bennett, Robert H. Graham, Richard Griffin, Virginia D. Harbuck, Gail Herring,

James Ingram, Robert and Karen Kopec, James Larry Rutledge, Leonore and Denny Smallridge)

TVA Response: *Increased traffic on Mull Road is a likely consequence of the development of recreational facilities on Parcel 77 under Alternative C (see Section 3.1.12.2 of the FEIS).*

Infrastructure

Aggregated Comment 246:

Modifying the zoning of Parcel 77 to developed recreation would require increased infrastructure such as roads, parking lots, a sewer treatment plant, dramatic clearing, and installation of associated utilities. (Commenters: Ellen Edwards, Richard Griffin, Linda Howard, Margaret Leslie, Nancy Johnson, Phyllis and Berno Pascen, Petition #2, Beverly Rambo, Robert Rambo, Eddie Pulley, Diane Pulley, Jerry and Faye Rogers, Donna C. Reams, Ed Reams, Cheryl Russell, Maureen Thompson)

TVA Response: *TVA agrees that a ball field complex would likely require the installation of additional infrastructure. However, no proposal for such a complex has been presented to TVA. Allocation of Parcel 77 to Zone 6 for developed recreation use under Alternative C was in response to a request from Towns County and the City of Hiawassee, Georgia (see Table 2-3 in the DEIS). Should TVA adopt Alternative C and allocate Parcel 77 to Zone 6, Towns County and the City of Hiawassee could request use of Parcel 77 for recreational purposes. This request would be subject to additional environmental review and approval by TVA. Under the Blended Alternative, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Aggregated Comment 247:

Changing the Zoning of Parcel 77 to Zone 6 will lead to negative impacts to the infrastructure and utilities of the town of Hiawassee. (Commenters: Greg and Anne Eickwort, William B. Johnson, Nancy Johnson, Petition #2, Maureen Thompson)

TVA Response: *Comment noted. If Parcel 77 were developed for a sports complex or other large-scale recreational facility, there would likely be a need for additional infrastructure such as sewers, water, and power to support the facility. The provision of additional necessary infrastructure would be the responsibility of the city, the county, and local utility companies.*

Socioeconomics

Comment 248: "I have used the TVA green space around the lake as a selling feature for our county. People purchasing land around the lake have made large investments in our area because of the green space." (Commenter: William J. Pierson)

TVA Response: *Comment noted.*

Aggregated Comment 249:

Any development of Parcel 77 will have a negative impact on the economy of Towns County. (Commenter: Dan Aiksnoras, Cary Bainbridge, Paula Brower, Donald K.

Carew, Tara Degeal, Walter and Marilyn Fuller, Herbert and Carolyn Gatch, Jean Hamilton, Karen Holmes, Ken Holmes, Eileen Millard, Jeanne Minichiello, Elva Paul, Philip Paul, Mark Ratchford, Maureen Thompson)

TVA Response: *Comment noted. As stated in Section 3.2.12.2 of the FEIS, changing of allocation of Parcel 77 from Zone 4 to Zone 6 could have both beneficial and adverse economic effects on the local economy.*

Aggregated Comment 250:

Placing a high-intensity recreational facility on Parcel 77 could lower the property values of surrounding neighborhoods. (Commenters: Danielle Aquinas, Robert Backstrom, Elizabeth Bates, Donald K Carew, J. Thomas Chapin, Jerry Childress, Mary Childress, Bill Cogle, William J. and Brenda R. Collins, Cynthia Carew Darwent, Marlene and William C. Duke, Judy Griffin, Jim and Pat Halloran, Jim and Donis Hendry, Gail Herring, Nancy Johnson, William B. Johnson, Janet Kowalsky, Petition #2, C. Thomas and Shirla Petersen, E. B Pulley, Susan Rothblum, Maureen Thompson, Kenneth A. and Lorraine Sue Turner)

TVA Response: *The allocation of Parcel 77 under Alternative C for Developed Recreation was in response to a request by Towns County and the City of Hiawassee. As stated in Section 3.2.12.2 of the FEIS, location of a sports complex on Parcel 77 could result in lowered property values and decreased interest in residential development of nearby properties, at least in the immediate area. Under Alternative B and TVA's preferred Alternative D, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation).*

Aggregated Comment 251:

Changing the allocation of Parcel 77 from Zone 4 to Zone 6 and placing a high-intensity developed recreational facility on Parcel 77 will reduce the scenic beauty of the lake, which will hurt tourism. There will be fewer visitors to the lake, resulting in fewer tourism-based expenditures. Property values will decrease and taxes could increase. This would damage the local economy. (Commenters: Mr. and Mrs. Jon Anderson, Danielle Aquinas, Brenda Arnett, Robert Backstrom, Frances Callen, Casey Barnes, Erin Barnes, Graham and Phyllis Bell, Michael Bever, Russ Cagle, Bill Cogle, DonnaLee DeMuth, Ross DeMuth, Tucker Demuth, Ophelia Dickey, Michael Donohue, Paulette Doyeir, Janet Duke, Jim Duke, Ellen Edwards, David and Deedee England, Herbert S. and Carolyn Gatch, Richard Griffin, Richard and Margaret Guthman, David and Barbara Hansen, Shamina Henkel, Karen Holmes, Nancy Johnson, William B. Johnson, Joan King, Margaret M. Knight, Gary M. Kopacka, Paul and Victoria Lajoie, Ben Lilly Jr., Ben E. and Peggy I. Lilly, Mary Miller, Jennifer Myers, Sylvia Neese, Rena Noojin, Greg Noojin, Colene J. Oliver, Robert L. Oliver, M.L. Oswald, Phyllis and Berno Pascen, Petition #1, Petition #2, Petition #7, Hava Preye, Diane Pulley, Eddie Pulley, Beverly Rambo, Robert Rambo, Donna C. Reams, Ed Reams, Donald A. Reaser, Susan J. Reaser, Jerry and Faye Rogers, Thomas A. Romine, Judy Rosaco, Cheryl Russell, Larry and Janice Rutledge, Judy Rosasco, Leonore Smallridge, Richard Storck, Albert Swint, Becky Vashon)

TVA Response: *The economic effects anticipated under Alternative C are presented in Section 3.2.12.2.*

Comment 252: “There will be economic degradation as the shoreline resembles a city rather than a scenic getaway in the mountains. There will be a reduction in the purchase of new property and remodeling of existing properties. Properties will be devalued resulting in a lower tax base. There will be less work for many types of construction workers.” (Commenters: Glenda Giles, Sandy Chapin, Pam Kirk)

TVA Response: *The location of a large recreation facility on Parcel 77 would change the visual character of the local area, as stated in Section 3.2.9.2 of the FEIS. This could affect the desirability of the area as a tourist destination. However, additional park facilities near Hiawassee could enhance the attractiveness of the area for tourism (see Section 3.2.12.2).*

Comment 253: “Your DEIS is in error. The area is Not sparsely populated. Over 400 homes will be affected, most of which are from the 400,000 dollar range to well over two million dollars.” (Commenter: Edward Duben)

TVA Response: *There are many upscale residences located along the shoreline of Chatuge Reservoir. As stated in Section 3.2.12.1 of the DEIS, the estimated population of Towns County in 2006 was about 10,500 (see Table 3-19). The largest municipality in Towns County or Clay County is Hiawassee, which had a population of 808 in the year 2000 (see Section 3.2.12.1 of the DEIS). About 85 percent of the population of Towns County is located outside incorporated towns.*

Air Quality

Aggregated Comment 254:

Changing Parcel 77 to Zone 6 will negatively impact the air quality on Lake Chatuge. (Commenters: Dan Aiksnoras, Paula Brower, Edward L. Dedmon, Tara Degeal, Jean Hamilton, David and Barbara Hansen, Karen Holmes, Ken Holmes, Eileen Millard, Mary S. Miller, Elva Paul, Phillip Paul)

TVA Response: *Parcel 77 on Chatuge Reservoir is located in Towns County, Georgia. As stated in Section 3.1.11.1, Towns County is currently in attainment of the NAAQS. Potential impacts to air quality resulting from the allocation of Parcel 77 to Zone 6 under Alternative C are discussed in Section 3.2.11.2 of the FEIS. Any activities, either current or in the future, associated with developed recreation are not likely to cause any significant degradation of local air quality.*

Aggregated Comment 255:

The development of Parcel 77 would increase the traffic in the area due to the lack of adequate roads. An increase in traffic will increase the impact on air quality (i.e., car exhaust). (Commenters: Catherine Carew-Bednarski, Cynthia Carew Darwent, Marlene and William C. Duke, Linda Howard, William B. Johnson, Nancy Johnson, Karen A. Kopec, William B. Johnson, Petition #2, Leonore and Denny Smallridge, Maureen Thompson)

TVA Response: *Development of recreational facilities on Parcel 77 would likely increase traffic, especially on Mull Road. However, the degree of increase would depend on several factors. Any increase in local traffic is not expected to significantly affect air quality (see Section 3.2.11.2 in the FEIS).*

Boating Activity*Aggregated Comment 256:*

The development of Parcel 77 would increase the boating traffic on Chatuge Reservoir. The reservoir is already dangerous and heavily trafficked; the addition of developing Parcel 77 will cause more motorboat accidents. (Commenters: Catherine Carew-Bednarski, Janet Duke, Richard and Margaret Guthman, William B. Johnson, Walter Krueger, Ellen Pease, James Larry Rutledge)

TVA Response: *If TVA were to adopt Alternative C, under which Parcel 77 is allocated to Zone 6 (Developed Recreation), any future recreation development proposals for access or marina slips would be subject to TVA review and approval pending the completion of an environmental review. As appropriate, the environmental review would consider both boating density issues and water quality impacts. TVA has no jurisdiction over boating regulations, which are established and enforced by the states. Under TVA's preferred Alternative D, Parcel 77 is allocated to Zone 4 (Natural Resource Conservation).*

Recreation*Aggregated Comment 257:*

Changing Parcel 77 to Zone 6, Developed Recreation, will be incompatible with its current use of dispersed recreation. The land should be kept the way it is so future generations can enjoy hiking, biking, fishing, hunting camping, etc. (Commenters: Mr. and Mrs. Bruce R. Bennett, Natasha Darwent, Cary Bainbridge, Karen Holmes, Matthew Humphreys, Jonathan and Stephanie Roberts, Richard Storck)

TVA Response: *Comment noted. Dispersed recreation can and does occur on lands that are allocated to Zone 6.*

Public Safety*Aggregated Comment 258:*

Parcel 77 is surrounded by water and would be a dangerous place for a recreational development (i.e., an athletic complex). (Commenters: Dennis Havig, Jaime Pierson, William J. Pierson)

TVA Response: *Under Alternative C, Parcel 77 would be allocated to Zone 6 (Developed Recreation) in response to a request by Towns County and the City of Hiwassee. Any proposal for recreation facilities developed by the county or the city would need to meet relevant safety standards. Under the preferred alternative, Parcel 77 would be allocated to Zone 4 (Natural Resource Conservation). This allocation supports dispersed recreation uses.*

Aggregated Comment 259:

Additional park facilities would bring more crime into the area. (Commenters: Cynthia Carew Darwent, Judy Griffin)

TVA Response: *Comment noted.*

Comments about Ocoee 3, Hiwassee, Nottely, and Blue Ridge Reservoirs**General**

Comment 260: “I would like to see more areas to be able to hunt on the Apalachia, Hiwassee and Fontana. Better maps to show where you can hunt, and some more ATV for use during hunting season only for the use of land that is hard to access or to far to hike in so you don't have to carry all of your stuff two or three miles. I know there is a lot of bicycles but horses was here first and have lived here a long time and it would be nice to be able to ride horses in the mountains either on trails or just in the woods they do not tear up the land. But for those who do not respect the land that is being open for use mountain bikers, hikers, hunters, ATVs, horseback riders, boaters, and so on then higher fines and maybe expulsion for the property.” (Commenter: Scott Davis)

TVA Response: *TVA is working to improve its Web site to provide more information regarding lands where hunting is allowed. The USFS and state fish and wildlife agencies are also working to provide easier access to information on public hunting lands. General trail access is regulated by trail type and in some cases may not be available for horse or ATV access.*

Comment 261: “I hope you don't let no more housing on the lakes they are beautiful the way they are. On Hiwassee and Appalachia in general there are way too many houses now the land should be keep as natural as possible. Maybe a few more primitive camp sites that are close to the water but maybe not right on it. Please don't let NO MORE real estate companies or big land grabbing corporations get ahold of the land and take what the public has left to use.” (Commenter: Scott Davis)

TVA Response: *Comment noted.*

Comment 262: “The problem I see with the mountain land, all of it surrounding these lakes, is all of that sewage winding up in the water. Last, as a science person myself, I can tell you that if you test any of the water from Chatuge -- most of these lakes, but especially Chatuge and Nottely -- you could find that the e-coli count, which is considered a CFU count, would be in excess of State standards, yet the State will do nothing about it. They'll do nothing about the raw sewage that this town is dumping into this creek right across the lake. You can come through here any time you want most any night and they are dumping sewage and it smells just like raw sewage all through this town. They are already having problems like that in Hiwassee. Their sewage treatment plant is already too small and they are wanting to dump raw sewage in the lake now because they can't treat it all.” (Commenter: Roy Underwood)

TVA Response: *Water quality is discussed in FEIS Section 3.2.10 for Chatuge Reservoir and in FEIS Section 3.5.10 for Nottely Reservoir. To the best of TVA's knowledge, the City of Hiwassee has a valid National Pollutant Discharge Elimination System (NPDES) permit for discharge from its sewage treatment plant. This NPDES permit is administered by the state.*

Ocoee 3 Reservoir

Comment 263: “I own approximately 1800 feet of Ocoee River frontage just southeast (Up river) of the Grassy Creek Bridge. From reviewing the plan, it appears that the Ocoee 3 reservoir terminates at Grassy Creek bridge, therefore it appears that my property is not affected by the proposed plan or included in the planning area. If this is true, I want to thank you for the opportunity to comment, and to support the plan as proposed. If I am not correct and the area of the Ocoee River between the Grassy Creek bridge and Copperhill is included, I request notification by phone and email.” (Commenter: Mark Haney)

TVA Response: *Ocoee 3 Reservoir ends before it reaches Copperhill, Tennessee. The subject property would not be affected.*

Hiwassee Reservoir

Comment 264: “Although HRWC does not oppose some of the recreation requests that were submitted to TVA during the public scoping process, namely the requests by the Town of Murphy and partners for extension of the Heritage Riverwalk Trail (Hiwassee Parcel No. 24) and wade fishing access to the Hiwassee River (Hiwassee Parcel No. 49), it is HRWC’s position that the whole of Alternative C has the potential to significantly impact the water quality and watershed health of Lake Chatuge.” (Commenter: Gilbert S. Nicolson (Hiwassee River Watershed Coalition))

TVA Response: *As stated in Sections 3.2.10.2 and 3.3.10.2, the allocation of the three parcels on Chatuge Reservoir and the two parcels on Hiwassee Reservoir under Alternative C would tend to increase the potential for adverse effects to water quality as compared to Alternative A or B. Because of the small acreage (7.7 acres) that could be subject to developed uses (i.e., developed recreation), the potential for any adverse effects to water quality under Alternative D is low. Requests for facilities on any of these five tracts, as well as any other TVA tract, would be subject to TVA approval. Additional environmental review would be completed prior to issuance of that approval. TVA routinely requires the use of best management practices during construction and operation of recreational developments. The implementation of such measures is frequently a condition of approval. Facilities with discharges would be subject to state and federal regulations.*

Comment 265: “The N.C. Division of Public Health is issuing fish consumption advisories for T.V.A. mountain reservoirs due to the high levels of mercury as this letter is being prepared. In addition, swimming advisories have been posted in the past concerning elevated levels of bacteria. If this the high level of interest local and state stakeholders are promoting, the mix of human activities with past and ongoing advisories?” (Commenter: Donald E. Johnson)

TVA Response: *The State of North Carolina has a statewide advisory concerning the consumption of fish. Women of childbearing age are advised not to consume certain species of fish considered to be high in mercury and to eat less than two meals per week of low-mercury fish. North Carolina also advises pregnant women, women who may become pregnant, and children under the*

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age of 15 to avoid eating walleye from Fontana Reservoir. TVA neither actively promotes nor prohibits public activities on the mountain lakes.

Aggregated Comment 266:

We support the proposals for Parcels 34 and 49 on Hiwassee Reservoir that were requested by the Town of Murphy. (Commenters: Sue Boyd, Gilbert S. Nicolson)

TVA Response: *Comment noted.*

Comment 267: “I agree with the impact statement under proposals B and C, that the proposed rezoning of parcels 34 and 49 on Hiwassee Reservoir will have the potential to reduce scenic attractiveness of the shoreline and the aesthetic sense of place.”

(Commenter: Donald E. Johnson)

TVA Response: *Comment noted.*

Comment 268: “If an area is needed to promote wade fishing and launching of non-motorized watercraft, I suggest that the T.V.A. take a look at parcel 25 to accommodate these activities. I believe parcel 25 would be better suited with minimum impact. It is my belief that areas in the river basin above Murphy have been impacted enough with the ongoing construction activities.” (Commenter: Donald E. Johnson)

TVA Response: *Under Alternative C, Parcel 34 would be allocated to Zone 6 (Developed Recreation) to accommodate a request by the Town of Murphy for a stream access site for wade fishing. Under TVA’s preferred Alternative D, Parcel 34 would be allocated to Zone 4 (Natural Resource Conservation). As indicated in Table 2-1, a Zone 4 allocation would allow passive, dispersed recreational uses, but no developed recreational facilities. Under any of the alternatives, Parcel 25 would be allocated to Zone 6. Regardless of the zone allocation, in considering requests for use of TVA-managed land, TVA would require the implementation of appropriate measures, including best management practices, to reduce the potential for erosion, sedimentation, and adverse effects to water quality as conditions of approval for a land use.*

Comment 269: “I totally agree with the T.V.A’s impact statement on parcel 34 concerning archaeological resources. I know resources exist on Hiwassee Reservoir parcel 34 and agree with TVA’s impact statement. Increased human activities on parcel 34 and surrounding parcels would decrease these resources immensely.” (Commenter: Donald E. Johnson)

TVA Response: *If actions or activities that could potentially affect cultural resources on TVA properties are proposed, TVA will use a case-by-case approach to evaluate those potential effects. If cultural resources exist on Parcel 34, TVA will identify those resources and work through either the process identified in the relevant programmatic agreement with the State Historic Preservation Officer or the phased identification, evaluation, and treatment procedure to effectively mitigate adverse effects to cultural resources, as required by Section 106 of the National Historic Preservation Act.*

Comment 270: “I believe that a change in rezoning parcel 34 on Hiwassee Reservoir would have a negative effect to aquatic species that inhabit the river. These areas along

the river basin are extremely environmentally sensitive and any change would have an adverse impact.” (Commenter: Donald E. Johnson)

TVA Response: *Under Alternative C, Parcel 34 would be allocated to Zone 6 (Developed Recreation) to accommodate a request from the Town of Murphy for a stream access site for wade fishing, which is a low-impact recreational activity. As explained in Section 3.3.10.2 of the FEIS, the allocation of Parcel 34 to Zone 6 is not expected to impact aquatic life. In issuing approval for a specific use of this parcel, TVA would require the implementation of appropriate measures, including best management practices, to reduce the potential for impacts to aquatic life. Under TVA’s preferred Alternative D, parcel 34 would be allocated to Zone 4 (Natural Resource Conservation).*

Comment 271: “The proposal under alternative C to rezone parcel 34 would also impact animal and plant life.” (Commenter: Donald E. Johnson)

TVA Response: *Potential effects to terrestrial life resulting from allocating the 2.4-acre Parcel 34 to Zone 6 (Developed Recreation) are documented in Section 3.3.3.*

Comment 272: “In the past few weeks and months, I have personally observed bear, deer, coyotes, fox, rabbit and beaver along this river basin. Blue Heron have made their home here as well as hawks, eagles, wild turkey, osprey, king fishers, mallards, geese, and other species of fowl. Any future human invasion would only decrease the presence of wildlife and habitat. I believe any proposal to rezone parcel 34 or any parcel above parcel 25 would be redundant and could not be mitigated. I am in total opposition to the rezoning of parcel 34.” (Commenter: Donald E. Johnson)

TVA Response: *Comment noted. Please refer to Section 3.3.3 in the FEIS for a discussion of potential effects to terrestrial life resulting from the adoption of each of the alternatives, including Alternative C, under which Parcel 34 would be allocated for recreational use.*

Comment 273: “After reading the draft environmental impact statement prepared by the T.V.A. for the Hiwassee Reservoir, I have to disagree with T.V.A. findings, that under alternative C, that prime farmlands on Parcel 34 would not be affected. I would like for the T.V.A. to reconsider leases on parcels that were formally used for agricultural practices on or near parcels 30 through 40.” (Commenter: Donald E. Johnson)

TVA Response: *To assess potential impacts to prime farmland, TVA uses the Natural Resources Conservation Service (NRCS) data, under which site assessment criteria under the guidelines of the Farmland Protection Policy Act are used to gauge impacts of farmland conversions. Several of the factors in the site assessment indicate that any potential conversion of the acreages found in Parcels 30-39 would not be significant. The criteria include:*

1. Acreage
2. Adjacent nonfarm use
3. Evidence that the land has not been farmed in the last 5-10 years
4. Existence of local programs or policies to protect farmland
5. Existing water, sewer, and power services that would promote nonagricultural use

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6. Conversion of land would not prevent adjacent land from being farmed
7. Conversion of land would not adversely affect farm support services or markets in the area
8. Existence of on-site farm investments that would be affected by any action on the property

Under Alternative C, Parcel 34 would be allocated to Zone 6 (Developed Recreation) for possible recreational use, which would likely preclude future agricultural use. Nevertheless, this parcel does not qualify as prime farmland under the NRCS criteria. Under TVA's preferred Alternative D, Parcel 34 would be allocated to Zone 4 (Natural Resource Conservation).

Comment 274: "The ongoing construction of power substations on parcels 37 and 38 are decreasing prime farm lands along the Hiwassee River Basin." (Commenter: Donald E. Johnson)

TVA Response: *Environmental reviews were completed in 2006 for the construction of power substations on Parcels 37 and 38. Both environmental reviews concluded that no prime or unique farmland according to Natural Resources Conservation Service criteria would be impacted by the proposed actions.*

Comment 275: "As for the proposal for rezoning of parcel 49, careful consideration must be exercised as to the impacting of private properties and wetlands that are on or surround this area. I believe that an individual's privacy could be breached. If agreements can be reached with the affected property owner's, I see no reason not to make the former Louisville and Nashville Railroad Depot building the permanent terminus for the Heritage Partners River Walk Trail." (Commenter: Donald E. Johnson)

TVA Response: *According to Section 3.3.5.1 of the FEIS, there are no wetlands on Parcel 49 on Hiwassee Reservoir. As shown in Figure 2-5, no private property abuts Hiwassee Parcel 49. If TVA adopts Alternative C or D and Parcel 49 is allocated to Zone 6, a site-specific environmental review would be undertaken prior to TVA approval of any proposed recreational land use. Potential effects to wetlands and to neighboring properties would be addressed in that review.*

Comment 276: "I know that recreation is very, very, very, far down on the list of importance but the lake Hiwassee reservoir is dropping very quickly. After last year's experience of not being able to use the lake after July is there any possible way to slow the dropping of the lake until after Labor Day? I thought that as a result of the last study that the lake levels were going to be held until after the holiday. Once again people are having to pull docks and boats out in August. It is very depressing." (Commenter: Steve Stone)

TVA Response: *The annual drawdowns on the mountain reservoirs, including Hiwassee Reservoir, are necessary to ensure adequate flood storage capacity. TVA recognizes that water fluctuations affect recreational use. Hiwassee Reservoir is managed as a multiple-use reservoir.*

Comment 277: “Parcel 33 has been transferred to the N.C. D.O.T. for the purpose of a highway corridor. On this parcel 33, D.O.T. engineers are allowing a hazardous waste basin to be constructed adjacent to my property and others. In the event that a spill might occur on the soon to be finished roadway, potential petroleum, chemical, or radioactive materials would be contained in this basin next to residential properties.” (Commenter: Donald E. Johnson)

TVA Response: *The North Carolina Department of Transportation (NCDOT) exercises a permanent easement over Hiwassee Parcel 33 for a road right-of-way. TVA is aware of a catchment basin in the vicinity to control storm water runoff. TVA has no regulatory control over NCDOT operations. However, NCDOT is subject to various federal and state laws. If you have concerns about NCDOT operations or procedures, we suggest you contact NCDOT directly.*

Nottely Reservoir

Comment 278: “Lake Nottely: Please have some way to keep the wave Runners from coming too close to shore, they are destroying the banks and destroying the docks.” (Commenter: Michael Good)

TVA Response: *TVA does not have jurisdiction over boating regulations on Nottely. This is the responsibility of the state.*

Comment 279: “Poteete Park needs to be maintained for people camping over night and on weekends (not year round residents). People who picnic or swim should have free access to Poteete Park, but an attendant should be paid to maintain the area and not abuse the area.” (Commenter: Mrs. Sandra L Boyer)

TVA Response: *TVA’s agreement with Union County, Georgia, regarding the management of the Poteete Creek Campground allows for 75 percent of the sites to be used for seasonal camping. When this agreement expires, TVA will review the contract for opportunities to improve recreation experiences. The county has a resident manager on site and is responsible for administration and maintenance of the campground.*

Aggregated Comment 280:

Please keep water levels up on Lake Nottely so the landowners can fully utilize its recreational potential. There should be no variance greater 2 feet from high to low water level. (Commenters: Sandy Arnold, Mrs. Sandra L Boyer, Ron St. Romain)

TVA Response: *Annual drawdowns, especially on tributary reservoirs such as Nottely Reservoir, are necessary for flood storage. Because it is a multipurpose reservoir, TVA manages the reservoir and the water level to meet multiple objectives, including recreation, power production, and flood control. The water level of Nottely fluctuates approximately 17 feet, which is less than other reservoirs.*

Blue Ridge Reservoir

Comment 281: “I would just like to see Blue Ridge Lake stay just like it is. Don't change anything. I think they've done a good job of managing it. The only thing I would like to see is the water level raised and kept up and usable all year round. I don't know if that's possible or not, but that would be real nice.” (Commenter: Butch Laysor)

TVA Response: *The annual drawdowns on the mountain reservoirs, including Blue Ridge Reservoir, are necessary to ensure adequate flood storage capacity. TVA manages the reservoir and the water level to meet multiple objectives, including recreation, power production, downstream flow, and flood control. Over the last year or more, lake levels have been influenced by decreased rainfall. In addition, TVA is considering repairs at Blue Ridge Dam, and these repairs will involve a drawdown. However, once repairs are completed, the need for periodic drawdowns to inspect the penstock will not be necessary.*

Comments on the BRMEMC Substation

Support for a Substation

Aggregated Comment 282:

BRMEMC needs a new substation. The substation should be placed in an appropriate location (even if some people don't like the site). The substation could be built so that it is visually acceptable. (Commenters: Chris Kelley, Randy McConnell, Stephen B. Shepherd)

TVA Response: *Comment noted.*

Opposed to a Substation

Aggregated Comment 283:

We are opposed to locating a substation on Parcel 52. (Commenters: Richard and Madeline Botting, Sandra Chapin, Lindey and Mark Fitzgerald, Charles K. Kraus (TCHA), Walter Harold Long, Kim Patterson, Johnny Rogers, Joseph Ruf)

TVA Response: *Comment noted. Please refer to the environmental assessment "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," which TVA prepared in March 2009.*

TVA Policy

Comment 284: "The TVA wants to designate part of Lake Chatuge Parcel 52 (lakefront property) as Industrial and sell it to the Blue Ridge EMC, even though part of that land is below the 1933 line. The TVA proposed price is far below market level, yet the TVA needs to raise electric prices to generate more income." (Commenters: Brendan and Joan Neville)

TVA Response: *The disposal of a portion of Parcel 52 for use as a substation site for BRMEMC is addressed in the environmental assessment "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," which was issued by TVA in March 2009.*

Comment 285: "As a concerned citizen and resident of Towns County, it is with great urgency I declare my opposition to the BRMEMC Substation as the use of parcel 52. In a town where growth is relevant and acknowledged by its leaders, I can understand the need for a substation, however not at the expense of its youth and not in a location that demeans the beauty of our lake and mountains. If you look at all the communities that surround Towns County we pale in comparison with regards to recreational facilities. How is it we constantly struggle to accommodate our ever increasing population of young people? Show me all the TVA owned land where a substation could be situated and then show me all the flat, open, safe conveniently located land to accommodate a park facility for our community. This is not a hard choice to make." (Commenter: Kristina Albach)

TVA Response: *Comment noted. Under Alternative C and TVA's preferred Alternative D, the 6.1-acre Parcel 52 would be allocated for developed recreation use.*

Comment 286: "Before moving forward, I would ask that the TVA meet with the community and make careful consideration of alternatives uses for this property."
(Commenter: Michael Rogers)

TVA Response: *TVA has already solicited much public involvement and public comment regarding both the MRLMP and the BRMEMC substation request. See Sections 1.5 and 1.6 of the FEIS and the environmental assessment entitled "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia."*

Comment 287: "Per the TVA, two acres of the 9.4 acres in Parcel 52 'is being considered for use as a substation site and is being evaluated independently from the current land planning effort.' From page 10 in 1.5.3 of the DEIS. As a result of the Public Meeting, we have the following concerns: 1. Lack of a defined process to create and evaluate a plan for two acres in Parcel 52. We asked 5 different TVA people to explain the new process. None could explain it. It became obvious from their responses that there was no defined process, and that the TVA wanted to avoid an evaluation and skip public input, in order to sell this land, at a minimum price, and as secretly as possible to the Blue Ridge Mountain EMC. Many would call this a 'Sweetheart Deal', done 'in the dark.' One TVA rep said that the steps would be: 1. The TVA would re-categorize this land as only usable for an electric substation 2. The TVA would create a low price, of \$100,000 3. The TVA would have an auction only for companies capable of building electric substations. No one else would be allowed to attend, making sure that the Blue Ridge Mountain EMC was the only bidder. 4. Blue Ridge Mountain EMC would bid \$100,000 and the TVA would accept the bid. This 'deal' should be considered in violation of the TVA charter. The TVA has a mandate to conduct business in the open, solicit and seriously consider public input, and make the best land decision for the public and the government. Sweetheart Deals that circumvent the TVA process, ignore any opposing views, and provide land at far less than market price should not be allowed. There is no point in having a land management plan, if it can be ignored when the TVA wants to do so." (Commenter: Gus and Joan Neville)

TVA Response: *BRMEMC's request for use of TVA land for the construction of a substation was evaluated in an environmental assessment entitled "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia." TVA solicited public involvement and public comment with respect to both the MRLMP and the BRMEMC substation request. See Sections 1.5 and 1.6 of the FEIS for a description of the public involvement solicited for the MRLMP. See "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia, Environmental Assessment" for a description of the public involvement solicited with respect to BRMEMC's substation request. As explained in the environmental assessment, the property requested by BRMEMC, an approximate 1.4-acre portion of Parcel 52, was appraised to determine the minimum bid value. This value was determined by considering the requested use of the property and the development commitments listed in the Commitments section of the environmental assessment. The other permissible developed use*

of Parcel 52 that commenters have raised is recreation. Depending on the kind of recreational use assumed, TVA estimates the value of the 1.4-acre tract to range from \$81,000 to \$243,000. The estimate for a use limited to electrical substation purposes falls within this range. Under TVA's Land Policy, no part of Parcel 52 could be used for residential purposes, the highest valued use identified in public comments. At the public auction for the 1.4-acre tract, any entity with the financial ability to pay the minimum bid will be able to qualify to bid. TVA published notices in local newspapers advertising the public auction of the tract. The use of the parcel was limited to electrical substation purposes, consistent with TVA's valuation and the purpose of the requested sale. TVA works closely with distributors of TVA power to ensure that electricity service to the public is reliable and affordable, and the sale of the 1.4-acre tract for substation purposes supports those goals. This does not mean, however, that TVA has not given careful consideration to issues and information brought forward by opponents of the proposal, nor does it mean that TVA would have approved the request if environmental impacts were deemed unacceptable.

Comment 288: "How was this proposal for Parcel # 52 to become a 'Done Deal' without input from our commissioner William Kendall or the people of Towns County?" (Commenter: Carl S. Shultz)

TVA Response: *When TVA receives a proposal, it is subject to environmental review and approval. The proposal for the disposal of a portion of Parcel 52 for use as a substations site for BRMEMC is addressed in the draft environmental assessment entitled "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia", which was prepared by TVA in March 2009. As explained in the Necessary Permits and Public Involvement section of the EA, TVA issued a public notice seeking comments on the proposed action on April 29, 2008, and released the draft EA for a 30-day public comment period on October 22, 2008, thereby providing the people of Towns County and William Kendall a chance to provide input. As stated on page 30 of the BRMEMC DEA, Mr. William Kendall, Towns County Commissioner, was consulted.*

Comment 289: "Why should Blue Ridge Mtn. EMC be given a discounted property cost for this site?" (Commenter: Tony E. Branam)

TVA Response: *A fair market value is established by TVA's realty staff. This value is based on several factors, including the fact that the property, once transferred, would have deed restrictions placed on it, as described in the Commitments section of the BRMEMC EA. These restrictions would dictate the use of the property and would affect its future value. The other permissible developed use of Parcel 52 that commenters have raised is recreation. Depending on the kind of recreational use assumed, TVA estimates the value of the 1.4-acre tract to range from \$81,000 to \$243,000. The estimate for a use limited to electrical substation purposes falls within this range. Under TVA's Land Policy, no part of Parcel 52 could be used for residential purposes, the highest valued use identified in public comments.*

Comment 290: "The TVA's land use policy, as featured on the TVA website, offers some of the best reasons to vote against this proposal: The TCHA supports the

proposed change of the designation of this parcel to Zone 6 (Developed Recreation) and the request of the County that is be leased to them for soccer fields for our youth. However, we find the DEIS process being conducted in the 27 August meeting is, at best misleading, and likely deceiving of the public in that the potential TVA intent of taking 2 acres from this parcel and selling them to the BRMEMC for a very friendly price is mentioned nowhere in this document thus leaving the public with a very different impression of what could really happen. The TCHA will in no way support the Zone 6 designation if the substation proposal is granted because it would be folly to place recreation of park facilities next to an electric substation which, by its very owners, is treated as dangerous. In that case, the balance of the parcel should be left in its present zone classification.” (Commenter: Charles K. Kraus (TCHA))

TVA Response: *Comment noted. BRMEMC’s substation request was noted in Section 1.5.3 of the DEIS. As explained in Section 3.2.2.2 of the FEIS, TVA’s suitability/capability analysis of Parcel 52 indicated that the 6.1-acre tract ranked high for potential recreation use. On page 16 of the EA entitled “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia,” TVA concluded that the construction of the substation would not conflict with existing or future potential recreational use of Parcel 52. The BRMEMC EA also discusses electric and magnetic fields.*

Comment 291: “TVA shall continue to develop reservoir land management plans for its reservoir properties with substantial public input and with approval of the TVA Board of Directors. The land use allocations will be determined with consideration of the social, economic and environmental conditions around the region.’ This issue has not had public input from this community. In fact, Towns County Commissioner Kill Kendall has requested the TVA hold a public hearing on this issue. This should be conducted as a hearing and not in the open house format. Concerned citizens should be allowed both verbal and written inputs for the record. The construction of a power substation on this lakefront property will have a negative and lasting impact on the Social conditions.” (Commenter: Charles K. Kraus (TCHA))

TVA Response: *A separate and independent environmental review was prepared for the proposed substation on Parcel 52. TVA issued a public notice on April 29, 2008, seeking input regarding the substation proposal. On October 22, 2008, TVA released the “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia, Draft Environmental Assessment.” A public meeting was held at Towns County High School on November 13, 2008, regarding the draft EA. A 30-day comment period was open for any concerned citizen who chose to submit a comment. Comments were accepted through e-mail, mail, the TVA hotline, and an online comment form. All comments are included in the Final Environmental Assessment issued in March 2009.*

Comment 292: “How anyone in their right mind could think about putting a power plant in this area should be put out to pasture permanently. We live in one of the most beautiful areas in the state of Georgia and probably many other states. Doing this would destroy it and probably do GREAT damage to a lake that is having enough trouble staying in a pure enough condition for all of us to use for recreation and how about the fish being w/o contamination?” (Commenter: Gerri Baker)

TVA Response: *This substation will contain transformers that facilitate the distribution of power to local power users. The substation does not generate power. BRMEMC requested 2 acres on Parcel 52 from TVA for constructing a substation. After appropriate environmental review, TVA approved the public auction sale of a 1.4-acre tract for electrical substation use. The EA "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia" evaluated the potential impacts of the BRMEMC substation proposal on visual resources, water quality, aquatic life, and recreation.*

Comment 293: "It is my understanding that the EMC has requested tract 52 and tract 10 on the lake shore which is owned by the TVA to be rezoned to industrial so they can locate substations both now and in the future. I also have a house in Habersham County and we are not fortunate enough to have any large lakes. The Habersham EMC has substations and they locate them in parcels of land they purchased. Why does the Blue Ridge EMC feel the need to locate them on the beautiful shoreline of Lake Chatuge? Is the land free to them?" (Commenter: James H. and Judy T. Burrell)

TVA Response: *As stated in the EA "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," BRMEMC requested to that approximately 1.4 acres of property on Parcel 52 be sold at a public auction. TVA will charge appraised fair market value for the tract. The site is large enough for a single substation.*

Comment 294: "We have recent information that TVA management is looking for a way to avoid the public hearing they promised several of our members, Commissioner Kendall and Senator Isakson they would hold in the event they decide to press ahead with further consideration of the BRMEMC proposal. This represents an unconceivable breach of trust with the citizens of Towns County and the tax and rate payers who support TVA. This mistake must not be allowed to happen." (Commenter: TCHA)

TVA Response: *TVA sought public involvement and public input regarding the BRMEMC substation request, as reflected in the EA "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia." In addition to soliciting comments during a public notice comment period, TVA also solicited comments on the draft EA and held a public meeting on November 13, 2008, to provide a forum for submitting comments.*

Comment 295: "The Commenters are concerned by TVA's handling of the additional request by the BRMEMC for development of Parcel 52 on Lake Chatuge for use as an electric power substation. The Draft EIS states that this request is being handled separately and independently from the current land use planning effort. Draft EIS at 10. The Commenters request that the public be given the opportunity to provide input on the BRMEMC's request before any decision is made by TVA on this important issue." (Commenter: Gary Sheehan)

TVA Response: *TVA issued a public notice regarding the BRMEMC substation request on April 29, 2008, seeking public comments. On October 22, 2008, TVA issued a draft EA entitled "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," and sought*

comments via e-mail, mail, telephone, and TVA's Web site during a 30-day comment period. TVA held a public meeting regarding the proposal on November 13, 2008.

Comment 296: "Almost all the business in Towns County is either in the tourist sector, dependent on the tourist sector or indirectly affected by the tourist sector. We presently have a necessary but extremely unattractive power station welcoming tourists entering Hiawassee from the west. This station is right on the highway and unbelievably right on the lake!! Tourists have unfavorably commented on it to me many times. One comment was particularly insightful 'Whoever did this doesn't understand the value of the lake'!! For a county that makes its living on tourism it is a bad welcoming sight. Putting another, equally unattractive power station on the east entrance to Hiawassee would be a callused disregard for the economic future of a county that is blessed with the opportunity to excel in recreation and tourism. TVA should be helping us to increase the value of the lake for the economic well being of the local population not diminishing it for decades to come. Please consider another alternate site for the much needed additional power station." (Commenter: Joseph Ruf)

TVA Response: *TVA recognizes the importance of aesthetic quality and the value of tourism in the Chatuge Reservoir area. The aesthetic and socioeconomic impacts of the BRMEMC substation proposal were evaluated in the EA entitled "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," published in March 2009. TVA also realizes the importance of the availability of a reliable and affordable electric power supply with respect to the economic well being and growth of this area, and TVA works closely with distributors of TVA power to support this goal.*

Aggregated Comment 297:

If a new substation is needed, BRMEMC should find another, more secluded site away from the lake. Water access is not necessary for a substation. Lakefront property is too valuable to be used for a substation. Other, more suitable, sites are available.

(Commenters: Kristina Albach, Gerri Baker, Janet Bentley, Tony E. Branan, Michael Brock, Katherine Bever, Sandra Chapin, Leon Davenport, David and Deedee England, Craig Evans, Gail Herring, Robert A. Keys, Mark and Lindey Fitzgerald, Carol and Clifford Hall, J. D. Heer, Angela Kendall, Becky Landress, Ben E. and Peggy I. Lilly, Ben Lilly Jr., Steve Massell, Mary Mullin, Gus and Joan Neville, C. Thomas and Shirla Petersen, Hava Preye, Terence Radford, Priscilla Richardson, Michael Rogers, Susan Rothblum, Elizabeth H. Ruf, Joe Spellman, Charles K. Kraus (TCHA), Mary Ann Walden, Barry and Tricia White)

TVA Response: *As stated in the EA, "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," BRMEMC considered various alternative locations for a substation. BRMEMC has demonstrated the need for a new substation. The TVA Land Policy states that TVA leases and easements for commercial recreation purposes shall limit the use primarily to water-based recreation designed to enhance the recreation potential of the natural resources of the river and be a stimulus for regional economic development. Similarly, industrial requests for use of TVA property must contain a water-based component. These requirements do not apply to*

property transfers to TVA distributors. In addition, the 1.4-acre tract likely to be sold for substation use is located away from the water.

Comment 298: "I am vehemently opposed to this substation. Why - there are other locations that would serve the same purpose and not permanently destroy the lake Chatuge ambiance. \$1 million savings one time divided by 50,000 customers = \$20.00. This fee of 20.00 per customer is a bargain to not trash the lake!" (Commenter: Mike Jones)

TVA Response: *Comment noted. See the response to the previous comment.*

Comment 299: "TCHA has pledged to work with the BRMEMC to identify alternative sites. To date several have been located. However, BRMEMC has been reluctant to vigorously pursue these options, preferring to hope that TVA will grant their request and citing the potential increased cost thereof. But the lowest cost for BRMEMC is not always the best value for either Towns County or BRMEMC. For years people in this county and, indeed the County itself, have always chosen the lowest cost approach. Decades ago the Federal Government recognized that lowest cost was not always the right answer and developed the 'Best Value' approach to buying product. This lesson should be applied here and county issues taken into consideration. BRMEMC worries about moving further south on US 76 costing an additional \$800k per mile. But while they await the largess of TVA they have not done the trade studies that will show there to be gains as well as costs from such a move. For if it costs \$800k per mile for the added high power transmission lines it also costs less for the service lines because the substation would be closer to its customers. The net cost will not be zero, but it will certainly be less than the advertised \$800k. Looking at it a different way, and using BRMEMC's numbers, \$800k divided by 46,000 meters divided by 360 months (30 year amortization) equates to 4.8 cents per month plus interest. The customers will never notice the difference especially while swallowing TVA's recent 20% rate increase, and the County will be better served by a less prominent location." (Commenter: TCHA)

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

Visual and Aesthetic Quality

Comment 300: "Parcel 52 is not in an industrial area. In fact, according to the Mountain Reservoirs Land Management Plan Recommended Pre-Allocation-Recreation Parcels, Parcel 52 is designated 'open space providing visual benefits in a commercial area.' On Chatuge Reservoir Land Management Plan Map, Parcel 52 is designated 'open space suitable for future developed recreation' and it is colored red - Zone 6 - 'Developed Recreation.' Parcel 52 is adjacent to a site now being used as a campsite and marina for approximately 15 homes and 30 boat slips. This tract of land is directly across the lake from Beech Cove Vista, Lake Chatuge Heights and Sunny Side Shores, residential neighborhoods in existence since the early 1970s. In addition, this tract of lakefront land

sits directly below and within the view of many residences built on the mountainside. All of these residents built or purchased their homes at a premium because of the lakefront or lake view; not for a power substation view. Parcel 52 is also directly on Highway 76, a main route used by residents as well as visitors to Towns County, Hiawassee, Helen, Lake Burton, Clayton and other north Georgia destinations. Construction of a power substation on this land will have a dramatic and negative impact on countless property values in the region.” (Commenter: Charles K. Kraus (TCHA))

TVA Response: *According to the MRLMP FEIS, Parcel 52 was designated as Public Recreation in the Forecast System (see Appendix E of the FEIS). Parcel 52 would be allocated to Zone 4 (Natural Resource Conservation) under Alternatives A and B and Zone 6 (Developed Recreation) under Alternatives C and D (see FEIS Table 2-10). The socioeconomic impacts of the BRMEMC substation proposal were evaluated in the environmental assessment entitled “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.”*

Aggregated Comment 301:

A substation on Parcel 52 would be unsightly to local residents and to traffic (including visitors to the area) on Highway 76. A substation would spoil the ambient beauty of the area. (Commenters: Gerri Baker, Don H Berry, Tony E. Branan, Michael Brock, James H. and Judy T. Burrell, Katherine Bever, Michael Bever, Dudley and Peggy Castile, Tom Chapin, David and Deedee England, Mark Fitzgerald, Eileen Hedden, Bill Herold, Mike Jones, Angela Kendall, Robert A. Keys, Ben E. and Peggy I. Lilly, Ben Lilly Jr, Elisabeth and Oskar Letrotsky, Mary Mullin, Gus and Joan Neville, C. Thomas and Shirla Petersen, Hava Preye, Terence Radford, Todd Shutley, Joe Spellman, Steve and Kathy Stamey, Richard Storck, TCHA, Todd Turner, Paul and Kathy Yellina)

TVA Response: *Comment noted. The EA entitled “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia” evaluates the impacts of the BRMEMC substation proposal on traffic and visual resources.*

Comment 302: “TVA should require all their city and EMC customers to construct electrical substations at least 200 feet off the road with all distribution feeder circuits exiting the substation underground so that adequate landscaping can conceal these unsightly structures. (The private investor owned electrical utilities do this).” (Commenter: Tony E. Branan)

TVA Response: *TVA provides power to many local distributors. These distributors are not owned by TVA, and TVA cannot dictate the location of their substations. Similarly, TVA cannot require distributors to bury their “feeder circuits.”*

Aggregated Comment 303:

A substation or other industry on Parcel 52 would generate unwanted noise. (Commenters: Katherine Bever, Michael Bever, Sandra Chapin, Tom Chapin, Hava Preye)

TVA Response: *Parcel 52 is not being considered for industrial development under any of the alternatives considered in the FEIS. Potential noise effects expected to result from the BRMEMC substation proposal are described on*

pages 26 and 27 of the EA “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.”

Floodplains

Aggregated Comment 304:

Much of Parcel 52 is below the 1,933-foot elevation and is considered to be in the 100/500 year floodplain/floodzone. According to TVA policy, permanent structures are not allowed below the 1,933 contour. Allowing BRMEMC to construct a substation on Parcel 52 would violate TVA’s own policy. (Commenters: Don H. Berry, Tony E. Branan, Michael Brock, David and Deedee England, Mark and Lindey Fitzgerald, Robert A. Keys, Ben E. and Peggy I. Lilly, Ben Lilly Jr, Jack and Mary Miller, Brendan and Joan Neville, C. Thomas and Shirla Petersen, TCHA, Wiley P. Thomas)

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

The TVA property requested by BRMEMC is not subject to flowage easement. As stated in the final EA “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia,” based on surveyed contour data, only small portions of the 1.4-acre tract sold for use as a substation are located within the limits of the 100- and 500- year flood elevations. BRMEMC would place fill material to raise those portions to elevation 1,933.0 feet, which is 4 feet above the 100-year flood elevation at this location.

Water Quality

Aggregated Comment 305:

Putting a substation on Parcel 52 would create water pollution and degrade aquatic ecology. (Commenters: Katherine Bever, Michael Bever, Tom Chapin)

TVA Response: *Potential effects to water quality and aquatic ecology are described on pages 21 and 22 of the EA “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.”*

Socioeconomics

Aggregated Comment 306:

A substation on Parcel 52 would de-value the adjacent properties and properties directly across the cove, which would have to look at the substation. (Commenters: Sandra Chapin, Mark and Lindey Fitzgerald, Mary Lynn Miller, Brendan Neville, Gus Neville, Joan Neville, Michael Rogers, Charles K. Kraus (TCHA), Barry and Tricia White)

TVA Response: *The socioeconomic impacts of the BRMEMC substation proposal, including the effect on property values, are discussed on pages 24-25 of the EA “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.”*

Aggregated Comment 307:

A substation on Parcel 52 would create negative socioeconomic effects. Negative visual effects would decrease economic activity and reduce economic development in the area. Local businesses, including a nearby trailer park, would suffer. (Commenters: Michael Bever, Tom Chapin, Steve Massell, Joseph Ruf, Charles K. Kraus (TCHA))

TVA Response: *The socioeconomic impacts of the BRMEMC substation proposal are discussed on pages 24-25 of the EA “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.” The construction of a substation, which would ensure an adequate and reliable supply of electricity to the area, would allow the local economy to continue to grow.*

Aggregated Comment 308:

The Hiawassee area depends on tourism for part of the area’s income. Having a substation near the highway would be unsightly and would decrease tourism and cause economic harm to the area. (Commenters: Sandra Chapin, Mary Lynn Miller, Brendan Neville, Gus Neville, Joan Neville, Terence Radford, Joseph Ruf, Todd Shutley, TCHA)

TVA Response: *No significant impacts to visual resources in the area are expected as a result of the construction of a substation on Parcel 52, as discussed on pages 16-17 of the EA “Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia.” The socioeconomic impacts of the BRMEMC substation proposal are discussed on pages 24-25 of the final EA. Because the substation is not likely to significantly affect the visual resources of the area, it is not likely that tourism would decrease on account of the aesthetics of a substation.*

Air Quality

Aggregated Comment 309:

Locating an electrical substation on Parcel 52 will cause a degradation of air quality. (Commenters: Michael Bever, Sandra Chapin)

TVA Response: *Parcel 52 is on Chatuge Reservoir, which is located in Towns County, Georgia. As stated in Section 3.1.11.1 of the FEIS, Towns County is currently in attainment of the National Ambient Air Quality Standards. Any future activities associated with development of the substation are not likely to cause significant impacts to local air quality.*

Recreation*Aggregated Comment 310:*

Use Parcel 52 for recreational purposes. Do not locate a substation on Parcel 52.
(Commenters: Eileen Hedden, Jerry and Renee Montrose, Petition #4, Petition #8, Carl S. Shultz)

TVA Response: *Parcel 52 has been reviewed for potential future recreation uses and has been found to be suitable for and capable of supporting such uses. TVA's preferred alternative for Parcel 52 (which is now a 6.1-acre portion of the 9.4-acre Parcel 52 described in the FEIS) is Zone 6 (Developed Recreation). Specific recreation proposals will be subject to an environmental review and suitability/capability studies. As stated in the EA "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia," the construction of a substation on a 1.4-acre portion of Parcel 52 would not conflict with existing or future potential recreation use on the remaining acreage of the parcel.*

Public Safety*Aggregated Comment 311:*

Locating a substation on Parcel 52 would be dangerous, especially to children playing nearby (if the balance of the property were to be used for recreational purposes. Children would be exposed to overhead lines as well as pieces of exploding transformers and chemicals in the transformers). (Commenters: Maria Duben, Gerald P. Gutenstein, Angela Kendall, Gus and Joan Neville, Charles K. Kraus (TCHA))

TVA Response: *The EA "Blue Ridge Mountain Electric Membership Corporation Proposed Substation, Chatuge Reservoir, Towns County, Georgia" evaluates the impacts of electric and magnetic fields (EMF) and explains that EMF levels at the substation would be less than those produced by household products. In addition, BRMEMC has addressed public safety concerns in its design of the substation. The fence surrounding the substation would be locked unless workers were present and would contain barbed wire over the 8-foot-high chain link. Any future recreation proposals that may occur on the remainder of Parcel 52 would be evaluated for safety impacts, but with standard safety measures, TVA does not anticipate there would be an impact on recreational user safety.*

List of Agencies, Organizations, and Persons who Commented on the DEIS

Federal Agencies

U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service
U.S. Forest Service

State Agencies

North Carolina

North Carolina Department of Environment & Natural Resources
North Carolina Department of Transportation
North Carolina Department of Cultural Resources

Georgia

Georgia Department of Natural Resources
Georgia Department of Transportation
Georgia State Clearinghouse

Tennessee

Tennessee Department of Transportation
Tennessee Historical Commission
Tennessee Wildlife Resources Agency

Local Agencies and Private Organizations

Blue Ridge Mountain EMC
Chatuge Environmental Foundation, Inc
Clay County Master Gardener Volunteer Association
The Eastern Band of Cherokee Indians
Hiwassee River Watershed Coalition Inc.
Town of Hiwassee
Town of Murphy
Towns County Homeowners Association
Towns County Recreation and Parks Department
Western North Carolina Alliance

Individuals

Marcia Abrams
Atlanta, Ga.

Eric Adriansen
Norcross, Ga.

Melinda Agee
Avondale Estates, Ga.

Jim & Jeannie Ahlberg
No address given

Dan Aiksnoras
New York, N.Y.

Kristina Albach
Townsend County, Ga.

Val Aldrop
Hiawassee, Ga.

Jane & Bona Allen
Young Harris, Ga.

Andrea Anderson
Young Harris, Ga.

Brandy Anderson
No address given

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Hayesville, N.C.

Mr. & Mrs. Jon Anderson
Hayesville, N.C.

Danielle Aquinas
Quincy, Mass.

Brenda Arnett
Young Harris, Ga.

Sandy Arnold
Blairsville, Ga.

Richard Artmeier
Young Harris, Ga.

Robert Backstrom
Wheaton, Ill.

Mr. & Mrs. Henry W. Badach
Young Harris, Ga.

Cary Bainbridge
Smyrna, Ga.

Gerri Baker
No address given

Salli Ball
No address given

Casey & Erin Barnes
Acworth, Ga.

Amy Barnett
Hiawassee, Ga.

Cathy Barton
Atlanta, Ga.

Elizabeth Bates
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Phillip W. Baxter
No address given

Rebecca Beal
Hiawassee, Ga.

John Beebe
No address given

Joe Belanger
Hiawassee, Ga.

Graham & Phyllis Bell
Hiawassee, Ga.

Laura Benitez
Alma, M.I.

Bruce & Bonnie Bennett
Atlanta, Ga.
Hiawassee, Ga.

Norm Bennett
Hiawassee, Ga.

Tom Bennett
Hiawassee, Ga.

Janet Bentley
Hayesville, N.C.

Darren Berrong
Hiawassee, Ga.

J.C. & Sarah Berrong
Hiawassee, Ga.

Don H. Berry
Hiawassee, Ga.

Fred Betz
Young Harris, Ga.

Brian Bever
Atlanta, Ga.

Dr. Keith Bever
Alma, MI

Joan Bever
Charleston, S.C.

Lynne Bever
Linwood, MI

Michael & Katherine Bever
Hiawassee, Ga.

Terri Bever
Marietta, Ga.

Thomas & May May Bickes
Alpharetta, Ga.

Ronnie Bickley
Hiawassee, Ga.

Bill Bindewald
Wilton Manors, Fla.

Tom Bindewald
Willis, TX

Ross A. Blair
Hayesville, N.C.

Blue Ridge Mountain EMC
Young Harris, Ga.

William Blumreich
Young Harris, Ga.

Lydia Boeckel
Hiawassee, Ga.

Beverly & Gene Bolsius
Hiawassee, Ga.

Kim Bosco
Orlando, Fla.

Richard & Madeline Botting
Hiawassee, Ga.

Brian Bower
Hiawassee, Ga.

Sue Boyd
Dalton, Ga.

James & Sandra Boyer
Blairsville, Ga.

Jetta Bradley
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Tony E. Branan
Hiawassee, Ga.

Robert N. Brewer
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Mike Brewster
Hayesville, N.C.

Harvey Brickley
Atlanta, Ga.

Erik Brinke
Young Harris, Ga.

Lesley Brock
Decatur, Ga.

Michael Brock
Hiawassee, Ga.

Paula Brower Altamonte Springs, Fla.	Thomas & Mattie Chapin Hiawassee, Ga.	Scott Davis Englewood, Tenn.
George Brown Clyde, N.C.	Tom & Sandy Chapin Hiawassee, Ga.	Scott Davis Hiawassee, Ga.
Max & Sally Brown Hiawassee, Ga.	Kim C. Chicoine Amherst, Mass.	Edward L. Dedmon Hiawassee, Ga.
Norris Broyles III Atlanta, Ga.	James Childers Hiawassee, Ga.	Jo-Ann R. Demon Hiawassee, Ga.
LuAnn Bryan Swannanoa, N.C.	Jerry & Mary Childers Hiawassee, Ga.	Tara Degeal Bradenton, Fla.
James & Judy Burrell Cornelia, Ga.	Nancy Church Hiawassee, Ga.	Ross & DonnaLee DeMuth Hiawassee, Ga.
Shannon C. No address given	Richard D. Climo No address given	Tucker DeMuth Hiawassee, Ga.
Russ Cagle Hiawassee, Ga.	William & Barbara Coffman Hiawassee, Ga.	Ed DePrimo Hayesville, N.C.
John & Frances Callen Alpharetta, Ga.	Bill Cogle Hiawassee, Ga.	Michael Derby Roswell, Ga.
Clint Calvert Marietta, Ga.	Robert J. Collins Rock Spring, Ga.	Ophelia Dickey Young Harris, Ga.
Sarah Calvert Hiawassee, Ga.	William & Brenda Collins Hiawassee, Ga.	George Donegan Young Harris, Ga.
Sherry Canterbury Hiawassee, Ga.	George & Virginia Colvin No address given	Stephanie Donner Atlanta, Ga.
Carrie Carew No address given	Gordon & Wendi Cook Hayesville, N.C.	Michael & Jennifer Donohue Marietta, Ga.
Donald K. Carew Leverett, Mass.	Byron Cooper Hiawassee, Ga.	Paulette Doyeir Hayesville, N.C.
Scott Carew No address given	Robert H. Cowart Alpharetta, Ga.	Edward & Maria Duben Hiawassee, Ga.
Catherin Carew-bednarski Greenfield, Mass.	Bob Cowdrick Murphy, N.C.	Jim & Janet Duke Alpharetta, Ga.
Steve Carlyle No address given	Michael Crowe Atlanta, Ga.	William & Marlene Duke Cumming, Ga.
Diane Carmichael Clarkston, MI	Vivian Cutsler No address given	JD Edge Hiawassee, Ga.
Tommy Carmichael Lockport, IL	Kay & Dick D. No address given	Ellen Edwards Fayetteville, Ga.
Anne E. Caron Young Harris, Ga.	Cynthia Carew Darwent Mount Pleasant, S.C.	Greg & Anne Eickwort No address given
Dudley & Peggy Castile Hiawassee, Ga.	Natasha Darwent Mt. Pleasant, S.C.	David & Deedee England Hiawassee, Ga.
Nancy Caulder Tyrone, Ga.	Leon Davenport Blairsville, Ga.	Craig Evans Rosemount, MN
John & Anne Chambers Hayesville, N.C.	Lynda Davis Hiawassee, Ga.	Bruce & Virginia Everett No address given

Trudy Farkas No address given	Ed Gibson Hiawassee, Ga.	David & Barbara Hansen Hiawassee, Ga.
B.F Farmer Acworth, Ga.	Timothy C. Gilbert Guntersville, AL	Virginia D. Harbuck Hiawassee, Ga.
George Fell Hiawassee, Ga.	Glenda Giles Stone Mountain, Ga.	Marylinne Harper Blairsville, Ga.
Sara Ferguson Winchester, Mass.	John Goddard Griffin, Ga.	Terry Harrington Hiawassee, Ga.
Linda Lee Fike Hayesville, N.C.	Claudia Goldberg Boynton Beach, Fla.	Dennis Havig Hiawassee, Ga.
David & Deidre Fisher Alpharetta, Ga.	Malcolm Scott & Anita Golding Hayesville, N.C.	Will Hearce Young Harris, Ga.
Marjorie Fishman No address given	Michael Good Blairsville, Ga.	Eileen Hedden Hiawassee, Ga.
John Fitzgerald Hiawassee, Ga.	D.T. Grass No address given	Edward & Linda Hedden Hiawassee, Ga.
Mark & Lindey Fitzgerald Hiawassee, Ga.	Max Green Jackson, Ga.	John Hedges Alpharetta, Ga.
Margaret Fralry Brecksville, OH	Betty Bryce Greenhaur No address given	J.D. Heer Hiawassee, Ga.
Burt Franklin No address given	Rhetta Grey Hiawassee, Ga.	Jean Helms Hayesville, N.C.
Cala Franks No address given	Judy Griffin Duluth, Ga.	Charlie Hendon Atlanta, Ga.
Donn French Hiawassee, Ga.	Mary Griffith Hiawassee, Ga.	Mr. & Mrs. James Hendry Atlanta, Ga.
Walter & Marilyn Fuller Hiawassee, Ga.	Robert L. Guenhaur No address given	Jim & Donis Hendry No address given
Robert E. Garbe West Palm Beach, Fla.	Gerald P. Gutenstein Hiawassee, Ga.	Shamina Henkel Doraville, Ga.
J.T. Garrett Hiawassee, Ga.	Richard & Margaret Guthman Hiawassee, Ga.	Bill Herold Hiawassee, Ga.
Jeff Garitt No address given	Heath H. No address given	Gail Herring Hayesville, N.C.
Herbert & Carolyn Gatch Hiawassee, Ga.	Doug Hadaway Acworth, Ga.	Jerry & Jean Herrington Hayesville, N.C.
David Geiger Hiawassee, Ga.	Clifford & Carol Hall Hiawassee, Ga.	C.E. Hewatt Young Harris, Ga.
Kevin Geiger Atlanta, Ga.	Jim & Pat Halloran Hiawassee, Ga.	Gene & Lou Hewatt Young Harris, Ga.
Annette Gelbrich Norcross, Ga.	Ken Halron No address given	Darlene Hills No address given
Pravin Ghandi Elk Grove, IL	Jean Hamilton Hedgeville, W.V.	Bill Hinshaw No address given
Barbara Gibson Hiawassee, Ga.	Mark Haney Marietta, Ga.	Glenn Hitchcock Hiawassee, Ga.

Pamela J. Hitchcock Alpharetta, Ga.	Nancy Johnson Hiawassee, Ga.	Ben Kopacka Hiawassee, Ga.
John Hitselberger Hiawassee, Ga.	Patrick Johnson No address given	Robert & Karen Kopec Hiawassee, Ga.
Paul & Petie Hodge Hiawassee, Ga.	Ralph Johnson Blairsville, Ga.	Melanie Kopp Roswell, Ga.
Donald Hogsed No address given	William B. Johnson Hiawassee, Ga.	Kenneth Koushel Alpharetta, Ga.
Elizabeth Holland Dunwoody, Ga.	Charm Jones Marietta, Ga.	Janet Kowalsky Hiawassee, Ga.
Lee Fike-Holland Hayesville, N.C.	Michael Jones No address given	Walter Krueger Alpharetta, Ga.
Winona Holloway Jackson, Ga.	Tito Kalb Dunwoody, Ga.	Paul & Victoria Lajoie Hiawassee, Ga. Hayesville, N.C.
Ken & Karen Holmes Hiawassee, Ga.	Deborah Kalish Fayetteville, Ga.	Becky Landress Young Harris, Ga.
Kathryn Holmes Hiawassee, Ga.	Cene P. Kaplon Hiawassee, Ga.	Aletha Langham Hiawassee, Ga.
Paul Holy Hiawassee, Ga.	Chris Kelley No address given	Richard LaPlante No address given
Chad Hooper Hiawassee, Ga.	Debbie & John Kelsey Hayesville, N.C.	Margaret Lawler Hiawassee, Ga.
Sandy Horling Orange, CT	John Kelso Woodstock, Ga.	Butch Laysor Morganton, Ga.
Linda Howard Atlanta, Ga.	Rebecca Kemp Campobello, S.C.	Jamie Lea Blairsville, Ga.
James howell No address given	Angela Kendall No address given	Deanna M. Ledford Young Harris, Ga.
Jackie Huffman Powdersprings, Ga.	Robert A. Keys Hiawassee, Ga.	Kirsten Ledford Young Harris, Ga.
John Humphrey Hayesville, N.C.	Joan King Atlanta, Ga.	Debra LeGere Woodstock, Ga.
Lisa Humphreys No address given	M. Janice Russell King No address given	Wes Leroon Hiawassee, Ga.
Matthew Humphreys Atlanta, Ga.	J. Kinsey No address given	Margaret Fortson Leslie Alpharetta, Ga.
Donna Hurtak Hayesville, N.C.	Pam Kirk Dallas, Ga.	Oskar & Elisabeth Letrotsky No address given
James Ingram No address given	Lorraine Klug Hiawassee, Ga.	Bob Licata No address given
Gene & Fairy Jackson Hiawassee, Ga.	William J. Klug Hiawassee, Ga.	Ben Lilly Jr. Alpharetta, Ga.
Dee Dee Jacobs Gainesville, Ga.	Margaret Knight Hiawassee, Ga.	Ben & Peggy Lilly Hiawassee, Ga.
Donald E. Johnson Murphy, N.C.	Gary & Jeanne Kopacka Hiawassee, Ga.	Pennye W. Loftin Hiawassee, Ga.

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Theresa Marcucci
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Lane Martin
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Blue Ridge, Ga.

Steve & Krista Massell
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Sandy Springs, Ga.

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Eileen Millard
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Mary S. Miller
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Lea Mitchell
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Ed & Ellen Moore
Hiawassee, Ga.

Tony Morgan
Hiawassee, Ga.

Jack & Suzanne
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Ft. Lauderdale, Fla.

Rita Morrison
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Alpharetta, Ga.

Blake Moss
Suwanee, Ga.

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Helen Neiner
Cunning, Ga.

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Truitt Nelson
Marietta, Ga.

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Kathy Nix
Maysville, Ga.

Greg & Rena Noojin
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Kim Patterson
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Phillip Paul
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Maria Peane
Young Harris, Ga.

Ellen Pease Hiawassee, Ga.	Lynne Reid Acworth, Ga.	Chris & Elizabeth Sanders Hayesville, N.C.
Jim & Judy Perdue No address given	Joel Rice Los Angeles, Ca.	James Sanders No address given
C. Thomas & Shirla Petersen Hiawassee, Ga.	Steve & Susan Rice Shutesbury, Mass.	Philip Alvin Scharer Hayesville, N.C.
Jaime Pierson Hiawassee, Ga.	Priscilla Richardson Hayesville, N.C.	Charlie Schobel No address given
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Barbara Pittman Young Harris, Ga.	Robin Roberts Hayesville, N.C.	Kathryn Scroggs Hayesville, N.C.
Leonard & Millie Poole Young Harris, Ga.	Robin Blair Hiawassee, Ga.	Don & Irma Selman Hiawassee, Ga.
Jeff Powell Canton, N.C.	Henry Rodriguez No address given	Mr. & Mrs. William Shakespeare Young Harris, Ga.
Bill Preye Agawam, Mass.	Alan Rogers No address given	Stephen Shepherd Atlanta, Ga.
Matt & Hava Preye W. Springfield, Mass.	Bob & Betty Rogers Hayesville, N.C.	Jimmy Sherril Hiawassee, Ga.
Kristin Preye E. Longmeadow, Mass.	Jerry & Faye Rogers Hiawassee, Ga.	Steve Shlansky Hayesville, N.C.
William Edward Preye E. Longmeadow, Mass.	Johnny Rogers Hiawassee, Ga.	Barbara Shoak Young Harris, Ga.
Chris Pulley Marietta, Ga.	Michael Rogers Hiawasee, Ga.	Casey & Johnny Shook No address given
Eddie & Diane Pulley Marietta, Ga.	Mikey Rogers Hiawassee, Ga.	Todd Shutley Hiawassee, Ga.
E.B. & Nancy Pulley Marietta, Ga.	Sara Rogers No address given	Frederick Sickel Hayesville, N.C.
Steve Pulley Marietta, Ga.	Thomas A. Romine Marietta, Ga.	Leonore & Denny Smallridge Hiawassee, Ga.
Angie Purcell Marietta, Ga.	Judy Rosasco Hiawassee, Ga.	Barth Smith Hiawassee, Ga.
Bill Quarte Hayesville, N.C.	Susan Rothblum Boynton Beach, Fla.	Eugene Smith No address given
Terence Radford Hiawassee, Ga.	Joseph & Elizabeth Ruf Hiawassee, Ga.	Gerry Smith Hiawassee, Ga.
Robert & Beverly Rambo Hiawassee, Ga.	Barbara L. Russell Hiawassee, Ga.	Judy Southern Hiawassee, Ga.
Mark Ratchford Hiawassee, Ga.	Cheryl & Margaret Russell Hiawassee, Ga.	Stanley Southern Hiawassee, Ga.
Ed & Donna C. Reams Hayesville, N.C.	Larry & Janice Rutledge Snellville, Ga.	William S. Southern Hiawassee, Ga.
Donald & Susan Reaser Hiawassee, Ga.	Golda Sanders Hiawassee, Ga.	

Ann T. Spalding
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Ron St. Romain
No address given

Anton & Priscilla Stab
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Gene A. Stalcup
Orlando, Fla.

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Richard Stancil
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Nancy Steinfeldt
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Richard Storck
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Brenda Strickland
Riverview, Fla.

Marian Summer
Hiawassee, Ga.

Albert Swint
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No address given

Kimberly Tayloe
Memphis, Tenn.

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Young Harris, N.C.

Jim Tharp
Young Harris, N.C.

Tracey Tharp
Hiawassee, Ga.

Dr. Charles J. Thomas
McDonough, Ga.

Wiley P. Thomas
Woodstock, Ga.

Colleen Thompson
No address given

Maureen Thompson
Peachtree City, Ga.

Stephen K. Thompson
Hiawassee, Ga.

Sylvia Thorne
No address given

Doug Triestram
Blairsville, Ga.

George & Victoria Tucker
Hayesville, N.C.

Spencer Tunnell
Atlanta, Ga.

Kenneth & Lorraine Sue Turner
Hiawassee, Ga.

Patrick Turner
Hiawassee, Ga.

Todd & Victoria Turner
Hiawassee, Ga.

Michelle Underwood
Hiawassee, Ga.

Roy Underwood
Hiawassee, Ga.

Donna Van House
Atlanta, Ga.

Baldy VanAnderberg
Hayesville, N.C.

Hans Vandergouw
Brandenton, Fla.

Becky Vashon
Smyrna, Ga.

Kyle W.
No address given

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Hiawassee, Ga.

Jan Walden
Hiawassee, Ga.

Jan Waldron
Hayesville, N.C.

Connie Wallace
Hiawassee, Ga.

Eli Warnock
Dunwoody, Ga.

Edward & Lynda Wesson
Hayesville, N.C.

Carrie Whitaker
Hayesville, N.C.

Barry & Tricia White
No address given

Anne & Sam Wilburn
Young Harris, Ga.

Holly Williams
Hiawassee, Ga.

Jeanna Mull Wimpey
Hayesville, N.C.

Tom Winn
No address given

Gale Wood
No address given

Henna Wood
No address given

Frank & Karen Wood
Blue Ridge, Ga.

Ward & Shirley Woolley
No address given

Paul & Kathy Yellina
Hayesville, N.C.