

2. ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This chapter describes the two alternatives (the No Action and Allocation Alternatives) and summarizes the environmental consequences associated with each alternative.

2.1 The Proposed Action

The proposed action is to formulate a comprehensive Plan to guide resource and property management decisions for TVA land on Tellico Reservoir. The Plan is intended to provide a clear direction for management, based on scientific, cultural, and economic principles. The Plan will address sensitive resources and issues and concerns raised by the public. In the Plan, TVA will also seek to integrate management of land and water resources, to provide increased public benefits, and to balance competing and, sometimes, conflicting resource uses. The Plan takes into account the comments received from the general public. It identifies the proposed range of uses for 12,643 acres (139 parcels) of TVA-owned public land.

2.2 Alternatives

TVA is considering two alternatives for making land use decisions for TVA land around Tellico Reservoir. Under the No Action Alternative (Alternative A), TVA would continue to use the existing 1982 land use plan, Contract No. TV-60000A, to manage TVA land on Tellico Reservoir. Under the Allocation Alternative (Alternative B), TVA would use an updated Tellico Reservoir Land Management Plan to guide future land use decisions.

For either alternative, Section 26a of the TVA Act requires that TVA approval be obtained prior to construction, operation, or maintenance of any dam, appurtenant works, or other obstruction affecting navigation, flood control, public lands, or reservations along or in the Tennessee River and its tributaries. TVA will consider Section 26a applications for residential shoreline alterations and related land use approvals only on lands specifically allocated for residential development or where the backlying property owners have the necessary rights for such use. A common feature of both alternatives is categorization of the residential and flowage easement shoreline. In accordance with TVA's SMP, the following three categories will be used:

- **Shoreline Protection** for shoreline segments that support sensitive ecological resources, such as federally-listed threatened or endangered species, high priority state-listed species, wetlands with high function and value, archaeological or historical sites of national significance, and certain navigation restrictions zones. Within this category, all significant resources will be protected.

- **Residential Mitigation** for shoreline segments where resource conditions or certain navigation restrictions would require special analysis of individual development proposals, additional data, or specific mitigation measures.
- **Managed Residential** for shoreline segments where no sensitive resources are known to exist. Routine environmental review would be completed for any proposed action.

Approximately 1.1 percent (1 mile) of the residential shoreline on Tellico Reservoir is in the Shoreline Protection category; 61.6 percent (38 miles) is in the Residential Mitigation category; and 37.4 percent (23 miles) is in the Managed Residential category.

Docks and other residential shoreline development would not be permitted on lands within the Shoreline Protection category because of the significant and sensitive nature of the resources contained in this area. By contrast, Section 26a applications for docks and other residential shoreline development in the Residential Mitigation area would be reviewed by TVA for compliance with the Shoreline Management Policy (SMP) (TVA, 1998a), and the Section 26a regulations; however, development restrictions or mitigation measures may be necessary in this shoreline category. Section 26a applications for docks and other shoreline development in the Managed Residential area would also be reviewed for compliance with the SMP and Section 26a regulations.

As new data are collected on the spatial location and significance of endangered species, wetlands, and cultural resources, TVA expects that adjustments to category boundaries may be necessary. Over time, some Shoreline Protection areas or Residential Mitigation areas could be moved into Managed Residential areas if new resource information warrants such a change. Similarly, some Managed Residential areas could be moved into the Shoreline Protection or Residential Mitigation category if new information supports such a change. Property owners should check with the Little Tennessee Watershed Team office for the current status of an area.

2.2.1 Alternative A – No Action Alternative

Under the No Action Alternative, TVA would continue to use the 1982 land use plan established by Contract No. TV-60000A with the Tellico Reservoir Development Agency. This plan allocates land into three categories: TVA retained land, transferred land, and land under easement.

Contract No. TV-60000A serves as a general guide for land use and/or development and documents actual and prospective use indicated for all land surrounding the reservoir. When a proposal is received from an external applicant or from an internal TVA initiative, the proposed land use is evaluated for consistency with the plan and the request is either approved or denied based on the

results of an environmental review and other considerations. Copies of TVA Contract No. TV-60000A and its supplements are available for review and recorded at the Loudon, Monroe, and Blount County Courthouses.

On Tellico Reservoir, land has been sold or transferred for various uses including industrial, residential, natural resource management, recreation, water treatment facilities, pump stations, and highway rights-of-way. Under Alternative A, these land use designations would continue as shown on Attachment A of Contract No. TV-60000A. Attachment A, also known as the Tellico Lake Recreation Map, shows the boundaries and locations of the land use designations established by this contract. In accordance with the Shoreline Management Initiative (TVA, 1998a), the land below the 820-foot (mean sea level [msl]) maximum shoreline contour, which TVA retained in fee, would be controlled by the outstanding landrights or rights implied from the use of the backlying land (such as industrial or residential access).

Attachment B of Contract No. TV-60000A is known as The Development Standards for the Tellico Project. The development standards promote public health, safety, convenience, and general welfare; ensure development based upon all applicable environmental requirements and sound land use practices; and foster the orderly development of the Tellico Project through the proper development, maintenance, management, and sale of land acquired by TVA.

Attachment C of Contract No. TV-60000A, Procedures for Approval of Private Recreational Water use facilities on Tellico Reservoir, addresses requests for approval of private recreational water use facilities on Tellico Reservoir. Under this agreement, a request for privately-owned facilities will be considered if it meets one of the following conditions: (1) the adjoining private property lies within 100 feet of the 820-msl contour and abuts those areas designated for Cultural/Public Use/Open Space Areas and Private Residential Areas; (2) the adjoining private property has outstanding rights of ingress to and egress from the reservoir pursuant to a deed or other similar document regardless of the distance from the 820-msl contour; or (3) the adjoining property was transferred by TVA to TRDA pursuant to Contract No. TV-60000A, and the proposed request meets the requirements established in Attachment B of the contract.

Requests under (1) and (2) above, complying with these criteria will be reviewed for conformity with TVA's Section 26a regulations and applicable program and policy interests, including TVA environmental review procedures and Executive Order Nos. 11988 (Floodplain Management) and 11990 (Protection of Wetlands), as applicable. Requests under (3) will be reviewed in accordance with the provisions of Attachment B to Contract No. TV-60000A and must be authorized by a Section 26a permit. All requests will be subject to shoreline development policies established by the TVA Shoreline Management Initiative (TVA, 1998a).

In cases where the applicant does not hold outstanding ingress/egress rights, but has submitted a request that complies with other TVA criteria and is acceptable to the USACE, TVA would consider granting the applicant a recreational easement. This type of easement is a unique feature used on the Tellico Project and conveys nonexclusive rights of ingress to and egress from the reservoir with permission to construct and maintain noncommercial water use facilities. The sale price is based upon TVA's appraisal of the value of the access rights to be conveyed plus engineering and administrative costs involved in the transfer process.

The intent of the above criteria is to provide a reasonable and safe access to abutting property owners to the main reservoir body. Properties isolated from the main reservoir body by public roads would not qualify for residential access under these criteria.

Attachment A in Contract No. TV-60000A, frequently referred to this document as the Tellico Reservoir 1982 land use plan map (Exhibit 1, located in map pocket), clearly identifies how the land is to be used under the existing land plan. The existing Tellico land use plan divides the TVA land and former TVA land into three categories:

- TVA-Retained Land – Tellico Project land acquired by TVA in the name of the United States for the Tellico Project lying above the 820 maximum shoreline contour (msc) which is retained by TVA to be managed, used, or disposed of in accordance with Contract No. TV-60000A. This land is suballocated to Cultural/Public Use/Open Space Areas, Industrial Development Areas, and Natural/Wildlife Areas. (Approximately 9959 acres.)
- Easement Land – Portions of the transferred land which are designated for Public Use Recreation purposes or to the Eastern Band of the Cherokee Indians. (Approximately 591 acres.)
- Transferred Land – All lands acquired by TVA in the name of the United States for the Tellico Project lying above the 820-msc and designated as either developed land or easement land except for the project land adjacent to Watts Bar Reservoir (approximately 202 acres) where the structure profile is 750-msl rather than the 820-msl. With the exception of the easement land, transferred land is no longer owned by TVA. This land is suballocated to Private Residential Areas, Industrial Development Areas, Cultural/Public Use/Open Space Areas and Commercial Recreation Areas. (Approximately 10,949 acres.)

Table 2.2.1-1 summarizes the 1982 land use plan designation categories.

Table 2.2.1-1 Tellico Reservoir Existing Plan Land Use Designation Definitions	
Plan Designations	Definition
RETAINED LAND	
TVA Dam Reservation	Land that is managed to protect the integrity of the dam and associated switchyards and power lines. Most TVA dam reservations provide a visitor reception building that overlooks the facilities. Day-use recreational activities such as picnicking, fishing, hiking, and bird watching are encouraged. Campgrounds and boat launching facilities are often available. Generally speaking, maintenance levels and care of the facilities are higher on dam reservation land than on other areas of the reservoir. Hunting and unregulated camping are generally prohibited on the reservations.
Cultural/Public Use/Open Space Areas	Tellico Project land which is either to be retained by TVA or to be transferred to TRDA (see “transferred land,” below) and managed so as to protect and enhance the cultural resources and scenic amenities of the project area; provide a buffer between incompatible or contrasting land uses; provide areas for passive or informal recreational purposes such as primitive camping, picnicking, hiking, fishing, and hunting; and permit complementary agriculture, forestry, and wildlife utilization of this land. Where cultural or scenic resources exist, appropriate activities may also be conducted to ensure that these resources are developed, interpreted, and protected and public access is accordingly limited or controlled.
Industrial Development Areas	Tellico Project land which is either retained by TVA or transferred to TRDA (see “transferred land,” below) and used for manufacturing, storage, warehousing, ports, and shipping buildings and facilities, and other related activities which serve to directly encourage the creation of jobs in the project area.
Natural/Wildlife Areas	Tellico Project land retained by TVA and managed so as to protect and enhance the natural qualities of the area around the reservoir that provide important habitat for resident and migratory wildlife; provide areas for passive or informal recreational purposes such as primitive camping, picnicking, hiking, fishing, and hunting; and permit complementary agriculture and forestry utilization of this land.
EASEMENT LAND	
Public Use Recreation Areas	Tellico Project land which is either transferred to TRDA, adjoining county(ies), or retained by TVA and used solely for Public Use Recreation purposes.
State Recreation Areas	A Grant of Easement from TVA to the Tennessee Department of Conservation for purposes of public recreation, historic and scenic preservation, and wildlife management for the benefit and enjoyment of the general public.
Eastern Band of the Cherokee Indians Memorial Site	A Grant of Easement from TVA to the Eastern Band of the Cherokee Indians which provides, among other things, for cooperation in the development of historical and cultural resources in the Tellico Reservoir Project area through a series of projects designed to memorialize the American Indian presence in the project area.
TRANSFERRED LAND	
Private Residential Areas	Tellico Project land that is transferred to TRDA with the designated purpose of Residential Access.
Commercial Recreation Areas	Tellico Project land that is transferred to TRDA with the designated purpose of Commercial Recreation.
Other	Other Development Land types—Cultural/Public Use/Open Space Areas; Industrial Development (described above)—can also be transferred.

Table 2.2.1-2 summarizes the 1982 Tellico land use plan designation of the retained land tracts on Tellico Reservoir. These acreages correspond to those on the Tellico Reservoir 1982 land use plan map (Exhibit 1).

Table 2.2.1-2 Allocation of Land in the 1982 Tellico Reservoir Land Use Plan (Alternative A)*		
Land Use Category	Acres	Percent of Total Land
TVA Dam Reservation	665.9	5.3%
Natural/Wildlife Areas	1,912.3	15.1%
Cultural/Public Use/Open Space Areas	7,679.9	60.7%
Industrial Development Areas	367.0	2.9%
Private Residential Areas	423.6	3.4%
Commercial Recreation Areas	41.7	.3%
Public Use Recreation Areas	484.9	3.8%
State Recreation Areas	901.8	7.1%
Eastern Band of the Cherokee Indians Memorial Site	109.6	.9%
Highway	56.1	.4%
Total	12,642.8	100.0%

*The sum of individual percentages may differ from the total due to rounding.

2.2.2 Alternative B – Allocation Alternative

Alternative B, the proposed Plan, was developed using information obtained from the public, existing and newly-collected field data both on land conditions and resources, and technical knowledge from TVA staff. It would allocate most TVA land into categories that emphasize sensitive resource management (preservation and enhancement of wetlands, biodiversity, and archaeological and historic resources) and natural resource conservation.

Public recreation projects that have been conceptually proposed by various agencies for Tellico Reservoir are presented under Alternative B. However, each of these proposals could be considered under either alternative. If they become formal proposals, the compatibility of the proposal with land use allocations or zoning would be considered, and each, individual proposal would be subjected to the appropriate level of additional environmental review. A minimal amount of additional development would be proposed to accommodate the following proposals:

- **The Eastern Band of the Cherokee Indians Development** - This 38-acre tract of TVA land (Parcel 94) is located in Vonore between Highway 411 and the Tellico River near the merging point of the Little Tennessee and Tellico Rivers. As conceptually proposed by the Eastern Band of the Cherokee Indians, this development could include, but not be limited to, a hotel, a

conference center, restaurants/lounges, boat docking facilities, fishing/marine concessions, walking trails, and general parking. Some of the revenues generated from this development would be used to support the operation of the Sequoyah Birthplace Museum. Under Alternative A this land is both Cultural/Public Use/Open Space Areas (25 acres) and Public Use Recreation Areas (13 acres). Under Alternative B, these parcels would be zoned Recreation.

- **Greenway.** The Tennessee Department of Environment and Conservation (TDEC) has asked TVA to consider including a linear park or Greenway along the right descending bank of Tellico Reservoir from Lotterdale Cove downstream to the recreation parcel upstream of Lower Jackson Bend. Because no formal proposal has been submitted by the state, the plan is conceptual rather than specific. The concept allows for access points, parking lots, restrooms, and/or picnic areas connected by a trail system that could be designed and built in stages. The exact locations of the proposed amenities have not been determined. The overall objective would be to connect Lotterdale Cove to Lower Jackson Bend while maintaining as much of the natural surroundings as possible. Under Alternative A, this land is designated as Cultural/Public Use/Open Space Areas. Under Alternative B, if the State proposed a Greenway approximately 10 miles long and up to 100 feet wide on existing public lands (tread with buffer), then approximately 121 acres within Parcels 8, 9, 10, 11, and 15 would be affected by the Greenway. The affected parcels would remain classified in Zones 3, 4, and 6.
- **Coytee Springs Recreation Area.** A new recreation site is proposed by TVA in the Coytee Springs area (Parcel 10). The amenities proposed for the site, including picnic areas, walking trails, and greenway entry/exit points, would be for day use only. The upstream portion of the site currently receives heavy informal recreation for fishing and camping. The proposed Greenway would pass through this recreation area. Under Alternative A, this land is designated as Cultural/Public Use/Open Space Areas. Coytee Springs Recreation Area would affect 84 acres and 1.1 miles of shoreline. Under Alternative B, this property would be classified in Zone 6.

TVA proposes to develop a **River Corridor** along the upper Tellico River portion of the reservoir. This is linear greenspace along both streambanks of selected tributaries entering a reservoir managed for light boat access at specific sites, riverside trails, and interpretive activities.

The purpose of a River Corridor is to afford opportunities for the recreating public to enjoy natural settings in a riverine environment. Portions of the Tellico River have these characteristics and are worth preserving for future generations. The upper Tellico River is predominantly undeveloped, with some exceptions where subdivisions have sprouted or adjoining private land owners have developed private water use facilities. A portion of the Tellico River offers free-flowing

water which transitions to a lake environment and flat water. Much of the river is not navigable by large boats due to inadequate year-round water depth or underwater obstructions.

A portion of Tellico River from below Sloan Bridge upstream to the end of TVA land and land rights for a distance of about 7.7 miles is proposed for use as a River Corridor. The River Corridor includes the upstream part of Parcel 131 and Parcels 134, 135, 136, 137, 138, and 139. The River Corridor, not including islands, would affect 216 acres of TVA land and 20.6 miles of shoreline. The River Corridor designation includes specific guidelines for private water and land use requests from landowners with ingress/egress rights along the shoreline. The purpose of these guidelines is to allow a qualified land owner to have a private water use facility while ensuring the protection of the natural settings along the shoreline. Once a landowner’s rights for a water use facility have been verified, and the usual 26a compliance checks are completed, additional proposed guidelines for River Corridor water use facilities would apply (see Appendix B-1)

Within the River Corridor at approximate River Mile 18.5 along the left descending bank of the Tellico River is a small tract (3 acres) of TVA land (Parcel 139) that is a proposed recreation site. Due to its location at the mouth of Big Creek and accessibility by existing road, this parcel is well suited as a recreation area that offers an opportunity for canoe and other types of light boat access. The TWRA has expressed an interest in managing the area. Once developed, this access point would include the basic river access facilities including steps or a small ramp and parking as appropriate.

TVA considered a wide range of possible land uses in the development of this Plan. Each parcel of land was reviewed to determine its physical capability for supporting certain uses, suitability of supporting these uses, and public needs. Based on this information, the Tellico Planning Team (see Appendix B-2 for a list of team members) allocated land parcels to one of seven planning zones defined in Table 2.2.2-1.

Table 2.2.2-1 Planned Land Use Zone Definitions	
Zone	Definition
1 Non-TVA Shoreland	<p>Shoreland located above summer operating range that TVA does not own in fee or land never purchased by TVA. TVA is not allocating private or other non-TVA land. This category is provided to assist in comprehensive evaluation of potential environmental impacts of TVA’s allocation decisions. Non-TVA shoreline includes:</p> <ul style="list-style-type: none"> • Flowage easement land—Privately- or publicly-owned land where TVA has purchased the right to flood and/or limit structures. Flowage easement land is generally purchased to a contour elevation. Since this land is subject to TVA’s Section 26a permitting requirements, the Shoreline Management Policy (SMP) guidelines discussed in the definition of Zone 7 would apply to flowage easement land fronting private residential development. • Privately-owned reservoir land—Including, but not limited to, Residential, Industrial/Commercial, and Agricultural.

Table 2.2.2-1 Planned Land Use Zone Definitions	
Zone	Definition
2 TVA Project Operations	<p>TVA reservoir land currently used for TVA operations and public works projects includes:</p> <ul style="list-style-type: none"> • Land adjacent to established navigation operations—Locks, lock operations and maintenance facilities, and the navigation work boat dock and bases. • Land used for TVA power projects operations—Generation facilities, switchyards, transmission facilities, and rights-of-way. • Dam reservation land—Areas used for developed and dispersed recreation, maintenance facilities, Watershed Team offices, research areas, and visitor centers. • Navigation safety harbors/landings—Areas used for tying off commercial barge tows and recreational boats during adverse weather conditions or equipment malfunctions. • Navigation day boards and beacons—Areas with structures placed on the shoreline to facilitate navigation. • Public works projects—Includes fire halls, public water intakes, public treatment plants, etc. (These projects are placed in this category as a matter of convenience and may not relate specifically to TVA projects.) • Highways adjusted due to the development of the Tellico Project—Includes highways that were relocated or elevated to a location or an elevation that would allow continued use during normal flood events. • Land planned for any of the above uses in the future.
3 Sensitive Resource Management	<p>Land managed for protection and enhancement of sensitive resources. Sensitive resources, as defined by TVA, include resources protected by state or federal law or executive order and other land features/natural resources TVA considers important to the area viewscape or natural environment. Natural resource activities such as hunting, wildlife observation, and camping on undeveloped sites may occur in this zone; but the overriding focus is protecting and enhancing the sensitive resource the site supports. Areas included are:</p> <ul style="list-style-type: none"> • TVA-designated sites with potentially significant archeological resources. • TVA lands with sites/structures listed on or eligible for listing on the National Register of Historic Places. • Wetlands—Aquatic bed, emergent, forested, and scrub-shrub wetlands as defined by TVA. • TVA land under easement, lease, or license to other agencies/individuals for resource protection purposes. • TVA land fronting land owned by other agencies/individuals for resource protection purposes. • Habitat protection areas—Areas managed by TVA to protect populations of species identified as threatened or endangered by the USFWS, state-listed species, and any unusual or exemplary biological communities/geological features. • Ecological study areas—Designated areas that are suitable for ecological research and environmental education by a recognized authority or agency. They typically contain plant or animal populations of scientific interest or are of interest to an educational institution that would utilize the area.

Table 2.2.2-1 Planned Land Use Zone Definitions	
Zone	Definition
	<ul style="list-style-type: none"> • Small wild areas—Areas managed by TVA or in cooperation with other public agencies or private conservation organizations to protect exceptional natural, scenic, or aesthetic qualities that can also support dispersed, low-impact types of outdoor recreation. • River corridor with sensitive resources—A linear greenspace along both streambanks of selected tributaries entering a reservoir managed for light boat access at specific sites, riverside trails, and interpretive activities. These areas will be included in Zone 3 when identified sensitive resources are present. • Significant scenic areas—Areas designated for visual protection because of their unique vistas or particularly scenic qualities. • Champion tree site— Areas designated by TVA as sites that contain the largest known individual tree of its species in that state. The state forestry agency “Champion Tree Program” designates the tree, while TVA designates the area of the sites for those located on TVA land. • Other sensitive ecological areas—Examples include heron rookeries, nest colonies, and unique cave or karst formations. • Land planned for any of the above uses in the future.
4	<p>Natural Resource Conservation</p> <p>Land managed for the enhancement of natural resources for human use and appreciation. Management of resources is the primary focus of this zone. Appropriate activities in this zone include hunting, resource management, wildlife observation, and camping on undeveloped sites. Areas included are:</p> <ul style="list-style-type: none"> • TVA land under easement, lease, or license to other agencies for wildlife or forest management purposes. • TVA land fronting land owned by other agencies for wildlife or forest management purposes. • TVA land managed for wildlife or forest management projects. • Informal recreation areas maintained for passive, dispersed recreational activities such as hunting, hiking, bird watching, photography, primitive camping, bank fishing, and picnicking. • Shoreline conservation areas—Narrow riparian strips of vegetation between the water’s edge and TVA’s backlying property that are managed for wildlife, water quality, or visual qualities. Such riparian zones contribute to the ecology of the reservoir by providing food and habitat for diverse populations of plants and animals normally found in these areas. Trees and understory vegetation protect water quality by filtering nutrients, sediments, and other pollutants from runoff before they reach the lake. They also provide shade, cover, and a food source for fish. • Wildlife observation areas—Areas with unique concentrations of easily observed wildlife that are managed as public wildlife observation areas. • River corridor without sensitive resources present—A river corridor is a linear greenspace along both streambanks of selected tributaries entering a reservoir managed for light boat access at specific sites, riverside trails, and interpretive activities. River corridors will be included in Zone 4 unless sensitive resources are present (see Zone 3). • Islands of 10 acres or less. • Land planned for any of the above uses in the future.

Table 2.2.2-1 Planned Land Use Zone Definitions	
Zone	Definition
5 Industrial/ Commercial Development	<p>Land managed for economic development purposes. Areas included are:</p> <ul style="list-style-type: none"> • <i>TVA land under easement, lease, or license to other agencies/individuals</i> for industrial or commercial purposes. • <i>TVA land fronting land owned by other agencies/individuals</i> for industrial or commercial purposes. • <i>Sites planned for future industrial use.</i> <p>Types of development that can occur on this land are:</p> <ul style="list-style-type: none"> • <i>Business parks</i>—TVA waterfront land which supports industrial or commercial development. • <i>Industrial access</i>—Access to the waterfront by backlying property owners across TVA property for water intakes, wastewater discharge, or conveyance of commodities (i.e., pipelines, rail, or road). Barge terminals are associated with industrial access corridors. • <i>Barge terminal sites</i>—Public or private facilities used for the transfer, loading, and unloading of commodities between barges and trucks, trains, storage areas, or industrial plants. • <i>Fleeting areas</i>—Sites used by the towing industry to switch barges between tows or barge terminals which have both off-shore and on-shore facilities. • <i>Minor commercial landing</i>—A temporary or intermittent activity that takes place without permanent improvements to the property. These sites can be used for transferring pulpwood, sand, gravel, and other natural resource commodities between barges and trucks. <p>(Commercial recreation uses, such as marinas and campgrounds, are included in Zone 6.)</p>
6 Recreation	<p>All reservoir land managed for concentrated, recreational activities that require capital improvement and maintenance, including:</p> <ul style="list-style-type: none"> • <i>TVA land under easement, lease, or license to other agencies/individuals</i> for recreational purposes. • <i>TVA land fronting land owned by other agencies/individuals</i> for recreational purposes. • <i>TVA land developed for recreational purposes</i> such as campgrounds, and day-use areas. • <i>Land planned for any of the above uses in the future.</i> <p>Types of development that can occur on this land are:</p> <ul style="list-style-type: none"> • <i>Commercial recreation</i>, e.g., marinas, boat docks, resorts, campgrounds, and golf courses. • <i>Public recreation</i>, e.g., local, state, and federal parks and recreation areas. • <i>Greenways</i>, linear parks located along natural features such as lakes or ridges, or along man-made features including abandoned railways or utility rights-of-way, which link people and resources together. • <i>Water access sites</i>, e.g., boat ramps, courtesy piers, canoe access, fishing piers, vehicle parking areas, picnic areas, trails, toilet facilities, and information kiosks.

Table 2.2.2-1 Planned Land Use Zone Definitions	
Zone	Definition
7 Residential Access	<p>TVA-owned lands where Section 26a applications and other land use approvals for residential shoreline alterations are considered. Requests for residential shoreline alterations are considered on parcels identified in this zone where such use was previously considered and where the proposed use would not conflict with the interests of the general public. As provided for in the SMP, residential access would be divided into three categories based on the presence of sensitive ecological resources.</p> <p>The categories are: (1) Shoreline Protection* for shoreline segments that support sensitive ecological resources, such as federally-listed threatened or endangered species, high priority state-listed species, wetlands with high function and value, archaeological or historical sites of national significance, or which contain navigation restrictions; (2) Residential Mitigation for shoreline segments where resource conditions or navigation conditions would require special analysis and perhaps specific mitigation measures, or where additional data are needed; and (3) Managed Residential where no sensitive resources are known to exist.</p> <p>Types of development/management that can occur on this land are:</p> <ul style="list-style-type: none"> • Residential water use facilities, e.g., docks, piers, launching ramps/driveways, marine railways, boathouses, enclosed storage space, and nonpotable water intakes. • Residential access corridors, e.g., pathways, wooden steps, walkways, or mulched paths which can include portable picnic tables and utility lines. • Shoreline stabilization, e.g., bioengineering, riprap and gabions, and retaining walls. • Shoreline vegetation management on TVA-owned residential access shoreland. • Conservation easements for protection of the shoreline. • Other activities, e.g., fill, excavation, grading, etc. <p>* <i>Docks and other shoreline development are not permitted on land categorized as Shoreline Protection.</i></p>

In accord with the TVA Shoreline Management Policy (TVA, 1998a), TVA committed to categorize the residential shoreline of Tellico Reservoir based on data collected during field surveys. A resource inventory has been conducted for sensitive species and their habitats, archaeological resources, and wetlands along Tellico Reservoir’s residential shoreline.

A basic premise of the reservoir land planning process is 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. Commitments include: transfers, leases, licenses, contracts, TVA projects such as the Dam Reservation or power lines, outstanding landrights, or TVA-developed recreation areas. Agricultural licenses would be excluded because they are considered to be an interim use of TVA land. For planning purposes, a total of 6103 acres of Tellico Reservoir lands are considered committed. Table 2.2.2-2 summarizes the allocation of committed land on Tellico Reservoir. Individual committed parcels are listed in Volume 2.

Table 2.2.2-2 Summary of Allocation of Committed Land on Tellico Reservoir		
Number of Parcels	Land Use Zones	Acres
2	2 - Project Operations	619.0
3	3 - Sensitive Resource Management	17.0
7	4 - Natural Resource Conservation	3228.7
6	5 - Industrial/Commercial Development	313.2
24	6 - Recreation	1529.1
9	7 - Residential Access	396.0
Total		6103.0

The balance of Tellico Reservoir (6540 acres) was considered “plannable land,” that is land that was not previously committed. Field data were collected on all unplanned land by technical specialists such as archaeologists, historic architects, wetland specialists, visual specialists, and biologists to identify all areas containing sensitive resources.

A key planning assumption of Alternative B was that areas identified as having sensitive resources would be protected by being placed into Zone 3, Sensitive Resource Management. However, if parcels with existing commitments (leases, licenses, contracts, etc.) contain sensitive resources, those parcels would remain zoned for the committed use. In addition, an environmental review would be needed prior to future activities that would impact the identified sensitive resources.

A review of all plannable land was conducted by TVA. Specialists were asked to rate each parcel as high, medium, or low by a given set of use-specific criteria (see Appendix B-3 for rating criteria) and to rank the parcels as high, medium, or low depending on customer needs. Customer needs were identified during the scoping process (see Appendix A-1) to help determine the most suitable use for the land. TVA power, navigation, natural resource stewardship, recreation, and economic development personnel rated and ranked the parcels as shown in Appendix B-4.

After the ranking exercise, the planning team and technical specialists met to allocate the plannable or uncommitted parcels to one of the six planning zones. Using resource maps and all of the information collected during the planning process including public input, the capability and suitability of each parcel was discussed. Allocation decisions were made by consensus.

These allocations were used to prepare the Plan (see Appendix A-1). The Plan contains an explanation of the planning process, an overview of the reservoir’s history and development, a description of each parcel, and maps of the proposed land plan. Table 2.2.2-3 summarizes the number of parcels allocated to each of

the six zones. The proposed land use allocation map for Alternative B (Exhibit 2 located in map pocket) shows the location of each parcel.

Land proposed by TVA to be allocated under this plan has been placed in Zones 2-7. Land already transferred in fee to TRDA or other entity is considered non-plannable.

Number of Parcels	Proposed Land Allocations	Acres	Percent of Total land
3	2 - Project Operations	635.1	5.0%
27	3 - Sensitive Resource Management	2,184.5	17.3%
41	4 - Natural Resource Conservation	7,136.5	56.4%
8	5 - Industrial/Commercial Development	331.4	2.6%
33	6 - Recreation	1,803.5	14.3%
27	7 - Residential Access	551.8	4.4%
Total		12,642.8	100.0%

2.3 Alternatives Eliminated From Consideration

The January 14, 1999, Notice of Intent to prepare the DEIS described three alternative plans. Two of these constitute Alternatives A and B, described above. The third alternative was similar to Alternative B, except that it would have allocated 853 acres of TVA-retained land on the downstream east bank of the reservoir for a commercial recreation and residential development proposed by Tellico Landing, Inc. (TLI). The TLI development would have also included 217 acres of TRDA land and backlying private lands. The TVA Board announced on March 15, 1999, that it would no longer consider the TLI proposal affecting TVA-retained properties. This third alternative has, therefore, been eliminated from consideration in this EIS.

More recently, Tellico Landing LLC has announced its intention to develop a scaled-back commercial recreation facility on the TRDA-owned Lower Jackson Bend tract and backlying private lands. Because the TRDA land is currently zoned for Commercial Recreation, this development would not require TVA approval. TVA approval would, however, be required for any associated water access facilities such as a boat launching ramp or dock. As of early June, 2000, TVA had not received any plans for this facility.

2.4 Comparison of Alternatives

Direct comparison of any given land use is difficult since the earlier land planning designations and the planning zones are not the same. However, Table 2.4-1 presents the balance of TVA land on the Tellico Reservoir when comparing the

two alternatives considered in this EIS. Under Alternative A, the designations including acreage/percentage data are shown as currently planned. Alternative B proposes to allocate 6540 acres of the total 12,643 acres retained by TVA that are not inundated by the reservoir. The remaining 6103 acres are those lands previously committed but retained under TVA ownership. Based upon the new planning zones being applied in recent reservoir land management planning, each of these current designations of Alternative A is shown as it would be zoned in the Alternative B land Plan. For example, the current definition for lands within Cultural/Public Use/Open Space Areas does not specifically match any one Alternative B zone description. Under the current plan, Cultural/Public Use/Open Space Areas has 7680 acres, which under Alternative B would be divided into five zones. The majority of TVA property would be allocated to Zone 3 (Sensitive Resource Management) and Zone 4 (Natural Resource Conservation).

Dispersed informal recreational activities commonly conducted on areas designated under Public Recreation Areas, Cultural/Public Use/Open Space Areas, or Natural/Wildlife Areas of Alternative A may also be conducted in Zones 3 and 4 of Alternative B. Areas that are developed or may have future recreational development are allocated to Zone 6 (Recreation) in the Plan.

A major change from existing land designations is the creation of Zone 3 (Sensitive Resource Management). Land containing sensitive resources such as sensitive species, archaeological resources, significant visual resources, wetlands, and others is allocated to this zone. Under Alternative A, the resources identified for protection would be protected by individual environmental reviews of specific land use proposals. However, allocation of these resources to Zone 3 in Alternative B allows the protection of the sensitive resource to be the overriding objective for the management of a particular parcel of land, as well as providing an additional tool to better manage the potential for cumulative effects which might occur to a sensitive resource.

Alternative A (Current Allocation)			Alternative B		
Description	Acres	Percent	Zone	Acres	Percent
Cultural/Public Use/Open Areas	7,679.9	60.8%	Zone 3	1,621.3	12.8%
			Zone 4	5,672.4	44.9%
			Zone 5	18.2	0.1%
			Zone 6	246.5	1.9%
			Zone 7	121.5	1.0%
			Total	7,679.9	60.8%

Table 2.4-1 Comparison of Land Use Under Alternatives A and B*					
Alternative A (Current Allocation)			Alternative B		
Description	Acres	Percent	Zone	Acres	Percent
Natural/Wildlife Areas	1,912.3	15.2%	Zone 3	556.6	4.4%
			Zone 4	1,260.1	10.0%
			Zone 6	12.2	0.1%
			Zone 7	83.4	0.7%
			Total	1,912.3	15.2%
Commercial Recreation Areas	41.7	0.3%	Zone 6	41.7	0.3%
			Total	41.7	0.3%
Public Use Recreation Areas	484.9	3.8%	Zone 4	2.8	<0.1%
			Zone 6	482.1	3.8%
			Total	484.9	3.8%
State Recreation Areas	901.8	7.1%	Zone 3	1.3	<0.1%
			Zone 6	900.5	7.1%
			Total	901.8	7.1%
Eastern Band of the Cherokee Indian Sites	109.6	0.9%	Zone 4	0.2	<0.1%
			Zone 6	109.4	0.9%
			Total	109.6	0.9%
TVA Dam Reservation	665.9	5.2%	Zone 2	614.3	4.8%
			Zone 4	48.5	0.4%
			Zone 7	3.1	<0.1%
			Total	665.9	5.2%
Highway	56.1	0.3%	Zone 2	20.9	0.2%
			Zone 3	0.4	<0.1%
			Zone 4	18.2	0.1%
			Zone 5	16.6	0.1%
			Total	56.1	0.3%
Private Residential Areas	423.6	3.3%	Zone 3	4.9	<0.1%
			Zone 4	63.7	0.5%
			Zone 6	11.1	0.1%
			Zone 7	343.9	2.7%
			Total	423.6	3.3%
Industrial Development Areas	367.0	2.8%	Zone 4	70.5	0.4%
			Zone 5	296.6	2.4%
			Total	367.0	2.8%
Total	12,642.8	100%		12,642.8	100%

*The sum of individual percentages may differ from the total due to rounding.

Most of the land currently committed to a specific use would be allocated to that current use under either Alternative A or B. As reflected in Table 2.4-1 and parcel descriptions included in the Plan, the most substantive changes from the current land use allocations to the new system of zones would be as follows:

- Reallocation of about 389 acres from Cultural/Public Use/Open Space Areas to Recreation. This acreage includes approximately 38 acres needed to support a renewed proposal by the Eastern Band of the Cherokee Indians for commercial recreation development (possible hotel/conference/resort) near Highway 411 in Vonore at the mouth of the Tellico River. Proceeds from this activity would be used to support the continued operation of the Sequoyah Birthplace Museum. The proposed allocation for the remaining acreage is as follows: 140 acres to Commercial Recreation, for which there are no formal proposals, and 211 acres to Public Recreation.
- Clearer definition of lands where the adjoining property owners currently qualify for private water use facilities (i.e., 122 acres from Cultural/Public Use/Open Space Areas, 3 acres from TVA Dam Reservation, and 83 acres from Natural/Wildlife Areas). TVA did retain fee interest below the 820-foot contour on Tellico Reservoir. The zones proposed under Alternative B would simply recognize that the marginal strip lands (those below 820-foot contour) would be classified to reflect the rights of the existing backlying property owners. Lake access rights are governed by the deed conveying the affected backlying property and by Contract No. TV-60000A with TRDA. Conversely, 80 acres affected by sensitive/protected resources and/or physical constraints that are unsuitable for such use have been moved from the Private Residential designation to more protective Zones 3, 4, or 6.

Alternative A would continue the use of the 1982 land use plan as described in Section 2.2.1. Selection of this alternative could result in some reduction in potential long-term benefits on Tellico Reservoir. Alternative B would allocate land into categories that emphasize sensitive resource management and natural resource conservation as described in Section 2.2.2. Selection of this alternative would be beneficial to public lands and would protect current resource functions and values. However, as described in individual resource evaluations in Chapter 3 and summarized in Table 2.4-2, impacts of either alternative would be insignificant.

2.5 The Preferred Alternative

The Preferred Alternative is Alternative B. This alternative formulates a new and comprehensive Reservoir Land Management Plan for 139 parcels of TVA land on Tellico Reservoir. This Plan grandfathers previous land use commitments and allocates uncommitted TVA land into zones that allow for a balance of development and conservation.

Section	Resource Area	Alternative A	Alternative B
3.1	Visual Resources	A general cumulative decline in undeveloped scenic/aesthetic resources is expected as residential and commercial development increase. The 1982 land use plan does not have a designation for scenic/aesthetic protection of TVA held tracts. Visual impacts of development would continue to be evaluated prior to issuance of permits.	Generally has a beneficial effect on visual resources. Land with distinctive visual characteristics or outstanding scenic qualities would be placed in the Sensitive Resources Management Zone or the Natural Resource Conservation Zone (Zones 3 and 4). Cumulative effects to visual resources would be less, as compared to Alternative A. Visual impacts of development would continue to be evaluated prior to issuance of permits.
3.2	Cultural Resources	Surveys of about 20 percent of the plan lands identified 410 archaeological resources. Two-thirds of these resources are on Cultural/Public Use/Open Space Areas and Natural/Wildlife Areas lands where activities resulting in potential impacts are unlikely. All activities resulting in potential impacts to cultural resources would be evaluated under the Phased Identification and Evaluation Procedure, set forth in regulations of the Advisory Council on Historic Preservation. The activities would be approved, mitigated, or denied according to the significance of the resource. If mitigation is required, appropriate archaeological investigation will be necessary and potentially impacted resources will be properly recorded and removed.	About 63 percent of the 410 identified archaeological resources are on lands that would be in Zones 3 and 4, affording them a high degree of protection. All activities resulting in potential impacts to cultural resources would be evaluated under the Phased Identification and Evaluation Procedure, set forth in regulations of the Advisory Council on Historic Preservation. A Memorandum of Agreement (MOA) has been prepared and executed with the Tennessee State Historic Preservation Officer (SHPO) for identification, evaluation, and treatment of historic properties that are eligible for inclusion in the National Register of Historic Places (NRHP).
3.3	Threatened and Endangered Species	<u>Plants</u> - Because no populations of federally-listed plants are known to occur on Tellico Reservoir lands, no impacts to such species are expected. Populations of listed species that might be discovered in the future would continue to be considered during TVA environmental review of individual projects and protective or mitigative measures would be implemented as required by law and TVA policy. Therefore, no direct impacts to rare plants are anticipated.	<u>Plants</u> - Because no populations of federally-listed plants are known to occur on Tellico Reservoir lands, no impacts to such species are expected. TVA environmental reviews would address direct threats to state- and federally-listed plants. The planning zones established would protect ecologically-sensitive parcels by acting as a “first filter” in the early stages of project planning, thereby minimizing conflicting land use requests.

Table 2.4-2 Comparison of Potential Environmental Effects by Alternative			
Section	Resource Area	Alternative A	Alternative B
	Threatened and Endangered Species (cont.)	<p><u>Terrestrial Animals</u> - Under the existing plan, several tracts of excellent wildlife habitat are designated as Cultural or Public areas. Effects to populations of terrestrial threatened and endangered species would be considered during TVA environmental reviews associated with specific projects; therefore, no significant adverse impacts are expected. Although this process would protect most populations of rare terrestrial animals, the ability to address cumulative impacts to rare terrestrial animals would be limited.</p>	<p><u>Terrestrial Animals</u> - Specific land use categories have been designated to protect sensitive terrestrial animals and their habitats and sensitive ecological areas. Cumulative impacts to rare species would be better addressed because of the comprehensive nature of the land planning process for Tellico Reservoir Lands. No significant impacts are anticipated.</p>
		<p><u>Aquatic Animals</u> - Environmental review procedures, including compliance with the Endangered Species Act, would assure that TVA actions would not likely adversely affect the habitat of rare species. However, while TVA would protect sensitive species during individual reviews, there is some potential for indirect or cumulative impacts.</p>	<p><u>Aquatic Animals</u> - Environmental review procedures, including compliance with the Endangered Species Act, would assure that TVA actions would not likely adversely affect the habitat of rare species. In addition, Alternative B protects several large areas containing wetlands and other sensitive terrestrial habitats. Many of these areas will act as riparian buffer zones and, thus, will have an indirect but positive effect on aquatic habitat quality. Also, large lowland areas protected for cultural concerns may provide additional protection to aquatic habitats. Therefore, if any sensitive aquatic species are present, Alternative B will afford these species and/or habitat greater protection than the 1982 land use plan.</p>

Table 2.4-2 Comparison of Potential Environmental Effects by Alternative			
Section	Resource Area	Alternative A	Alternative B
3.4	Terrestrial Ecology and Other Significant Natural Features	A large portion of TVA's retained land could remain undeveloped and managed indefinitely primarily for informal recreation. However, future land use actions driven by TVA, TRDA, or other public or private entities, could result in substantial impacts to terrestrial ecological resources on a localized basis. Cumulative impacts under this alternative would be considered insignificant on a regional basis.	Alternative B would provide for enhanced management and protection of terrestrial ecological resources on Tellico Reservoir properties. This would result from a longer commitment of certain land parcels to specific designations such as Sensitive Resource Management and Natural Resource Conservation. Also, the subsequent development of unit management plans would maintain and enhance natural biological diversity on these parcels. Selection of this alternative would result in insignificant impacts on terrestrial ecological resources on a regional and cumulative basis, and, consequently, improved future protection and management of terrestrial resources, wildlife habitat, and diversity on a reservoir-wide basis.
3.5	Wetlands/Riparian Ecology	Environmental review procedures would ensure insignificant impacts on wetlands and associated function and values, as well as wildlife dependent upon wetlands on a regional or subregional basis. Under Alternative A, wetland areas would most likely remain largely unchanged, although some emergent wetlands may gradually mature to shrub/scrub wetlands. Selection of Alternative A would have an insignificant impact on wetlands and associated functions and values on a regional or subregional basis.	Selection of Alternative B would provide a beneficial effect to wetland resources on TVA lands and best protect current wetlands' functions and values. Wetlands would be managed to protect and/or enhance the hydrology, soils, and vegetation of each wetland system to improve overall functions and values. Riparian communities would be managed to allow the natural development of native vegetation or restored through bioengineering where shoreline erosion is impacting these areas. Impacts to wildlife dependent on wetlands would likely be beneficial because of the long-term commitment of additional lands for natural resource protection and enhancement.

Table 2.4-2 Comparison of Potential Environmental Effects by Alternative			
Section	Resource Area	Alternative A	Alternative B
3.6	Recreation	Continuing with this alternative and its associated land designations would preclude comprehensive public input and application of broad public values. The cumulative effect of selecting this alternative could be less than optimal allocation of lands for recreation and some reduction in potential long-term recreational benefits on Tellico Reservoir.	This comprehensively addresses the existing physical characteristics of land being planned around Tellico Reservoir, current recreational use patterns, public input, anticipated recreational needs, and public values pertaining to recreational use of this property. Selection of this alternative would result in a slight increase in lands allocated for developed recreation and better integration of recreation with other reservoir land values. Informal recreation should not be affected.
3.7	Water Quality	Under this alternative, future land use and development is less restricted and has greater potential for incremental adverse effects on water quality from an increase in shoreline development (e.g., increased soil erosion, turbidity, levels of substances toxic to aquatic life, bacteriological content, and further increases in nutrient loading). TVA's current permitting process and best management practices would minimize impacts associated with development to insignificant.	Alternative B provides better opportunity to protect water quality by designating more parcels to Sensitive Resource Management or Natural Resource Conservation (Zones 3 and 4, respectively). This alternative limits development and ensures that other activities such as developed recreational use, resource management, or other conservation uses would be conducted with protection of natural resources as an objective. Allocation of other parcels for future developed recreational activities or other public access/use areas would allow TVA control over development to minimize adverse impacts. Direct, indirect, and cumulative impacts to water quality would be minimized and insignificant.

Section	Resource Area	Alternative A	Alternative B
3.8	Aquatic Ecology	There would likely be some minor degradation of aquatic habitats associated with continued development along the reservoir shoreline. Under this alternative, the quality of aquatic habitat (as evidenced by Shoreline Aquatic Habitat Index [SAHI] scores) would likely remain much like existing conditions. Few tracts of TVA property, however, are designated specifically for protection of sensitive resources, and the extent of protection of natural resources in other designations (such as the Cultural/Public Use/Open Space Areas) is vague. Although protection of the natural reservoir shoreline may be undertaken as a secondary consideration on tracts of TVA land designated for various uses, natural resource protection or conservation, and, consequently, impacts to aquatic communities may not be a primary consideration when land use decisions are made affecting those tracts.	Reservoir-wide quality of aquatic nearshore habitat would remain unchanged (as evidenced by SAHI scores). This alternative would provide a better opportunity to protect or enhance aquatic habitats by identifying sensitive resource management or conservation as the designated use on some tracts now having general designations such as Cultural/Public Use/Open Space Areas. Any of the proposed uses of Zone 3 or 4 lands would allow for the protection or enhancement of aquatic habitats by preserving a natural shoreline condition offering a variety of cover types. Some development of the reservoir shoreline is likely to continue under either alternative. However, Alternative B affords additional protection to aquatic resources near some Zone 7 lands by designating some adjacent shoreline as Zone 4, which will allow preservation of a more natural shoreline condition in some restricted areas of residential development.
3.9	Socioeconomics	This alternative currently classifies approximately 371 acres of land for industrial use. Although some of this land may not in fact be available for such use due to the presence of sensitive resources or due to its use for enhancement of natural resources, it would increase the range of opportunities available to industrial developers in the area. However, the impact on jobs and income in the local economy is uncertain. About 1400 acres of land are classified for recreation but would not likely result in an important increase in jobs and income in the area. Construction of homes and rentals would have a small impact on the local economy.	Alternative B, by allocating uncommitted TVA land, decreases the emphasis on commercial, industrial, and residential uses and increases the emphasis on sensitive resource protection and natural resource conservation. This change in emphasis might lead to less development on the shoreline. However, this change probably would not have an important impact on the local economy since much of this activity likely would occur nearby instead.

Table 2.4-2 Comparison of Potential Environmental Effects by Alternative			
Section	Resource Area	Alternative A	Alternative B
3.10	Navigation	All safety landings would continue to be available for use by the towing industry, and there would be no potential effects on commercial navigation.	There would be no additional effects to commercial navigation from this alternative. The land use designation for the shoreline containing the four safety landing tracts would have little or no impact on navigation.
3.11	Prime Farmland	Present amounts of prime farmland unavailable due to land use allocations (10.7 percent) would remain the same under the current plan. As proposals for future development are submitted to the agency over time, the assessment of impacts to prime farmland would be conducted on a case-by-case basis. Prior to future conversion of this land to nonagricultural uses, a Farmland Conservation Impact Rating (USDA-NRCS Form AD-1006) would be required.	Slight, insignificant decrease in the amount of prime farmland available (15.3 percent of prime farmland on TVA lands). Impacts to prime farmland soils will be minimal under the proposals for both greenways and the development near Hwy. 411 due to the very small acreage of prime farmland soils within each area. The proposed River Corridor would also have minimal impacts to prime farmlands.
3.12 Other issues			
3.12.1	Floodplains	Impacts to floodplain values would be insignificant. The allocation, development, and/or management of properties would be made on a case-by-case basis, and evaluations would be done individually to ensure compliance with Executive Order 11988. Potential development would generally consist of water use facilities and other repetitive actions in the floodplain that should result in minor floodplain impacts.	Impacts to floodplain values would be insignificant. However, potential adverse impacts to natural and beneficial floodplain values would be less than those under Alternative A because a substantial portion of the available land would be allocated for resource management and conservation activities. Little development which could affect floodplain values would occur on these Zone 3 and Zone 4 lands.
3.12.2	Noise	Activities on lands allocated to Dam Reservation, Cultural/Public Use/Open Space Areas, Natural/Wildlife Areas, or retained lands are unlikely to exceed community noise standards. TVA would review development plans to ensure that no significant noise-emitting facilities are included, and that construction noise controls are in place.	Same as Alternative A.
3.12.3	Air Quality	There would be insignificant effects on air quality.	Same as Alternative A.