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**DECONSTRUCTION OF THE
WATTS BAR MARINA AND RESORT
ENVIRONMENTAL ASSESSMENT**
Rhea County, Tennessee

Prepared by:
TENNESSEE VALLEY AUTHORITY
Knoxville, Tennessee

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Purpose and Need for Action

The former Watts Bar Marina and Resort (Resort) is located on TVA-managed land northwest of the Watts Bar Dam in Rhea County, Tennessee (Figure 1). Between 1956 and 2010, TVA licensed commercial recreation operators to operate the marina and resort facilities. Since approximately 2001, the resort facilities were neglected and have fallen into disrepair. The cabins, swimming pools and playground have deteriorated, the restaurant has closed, the grounds have become overgrown, and roadways are blocked with fallen trees. In December 2010, TVA terminated the license due to violations of the license agreement. Criminal activity has been reported to local law enforcement authorities. TVA closed the resort and marina and restricted access to the area. However, there is evidence of trespassing and use of the facilities for unauthorized and illegal purposes.

The abandoned facilities may contain hazardous materials including lead-based paint, fuel, oil, and chemicals that may pose a risk to the environment if not properly disposed of before further deterioration of the structures. The deteriorated structures are uninhabitable and cannot be used for recreational activities. It is not feasible to repair the cabins to habitable condition. TVA must decide whether to remove the Resort facilities to avoid potential environmental risks, eliminate illegal use, and improve the feasibility of the site being used for developed recreation in the future.

Proposed Action

TVA proposes to demolish various deteriorating structures at the site, including approximately 40 small cabins, a former restaurant and gift shop, a former marina building, and several small auxiliary structures. Swimming pools would be filled, covered with soil, and reseeded. The land on which the facility resides would continue to be zoned for developed recreational use, as described in TVA's Watts Bar Reservoir Land Plan (WBRLMP; TVA 2009). The proposed action is described in detail below.

Background

The Resort is located on approximately 185 acres in Rhea County, Tennessee (Figures 1 and 2). In the WBRLMP, the Resort is located on Parcel 300, which is allocated for developed recreation uses (TVA 2009). Some of the Resort facilities were originally part of the residential village for workers constructing Watts Bar Dam and Fossil Plant. Initial housing in the village included 40 single-family dwellings and 8 dormitories, and accommodated between 372 and 552 residents (TVA 1949). In addition to housing, the village included hospital facilities, a food market, a cafeteria, roads, sewer, potable water and other infrastructure. Construction of the village began in June 1939 and was substantially complete by December of that year (TVA 1939–1943; 1949).

Original village buildings were of frame construction with minimal architectural detail. They were typically built on concrete or wood piers, with pine framing and wood floors. The siding was insulating fiberboard and battens and/or pine shiplap. Roofs were of metal or

pine covered with asphalt strip shingles (TRC 2011). Single family homes were approximately 560 square feet, each containing two or three bedrooms, a living area, a bathroom, a kitchen, and a small porch.

Over time, parts of the original village were removed, including the former community building, auditorium, cafeteria, and women's dormitories. After construction of the Watts Bar Fossil Plant was completed, TVA sold at auction some of the larger buildings, including the hospital, cafeteria, a community building, and some dormitories (TRC 2011). Three dormitories were dismantled and transferred to the Fontana Dam project. Additionally, the former filtration plant and sewage disposal plant were removed, and the facility was connected to municipal water supply and sewage systems.

As recreation became a more significant part of TVA's mission, the village was converted from residential to recreational use. TVA licensed the area for commercial recreation from 1956 through 2010. During that period, a restaurant and gift shop building was constructed on the former site of the hospital, former family housing was restored to provide vacation cottages, and swimming pools were built. The licensees also added tennis courts and boat docks.

In the mid 1970s and 1980s, recreational habits of the public began to change. Recreational user habits were influenced by more upscale recreation attractions and use of the Resort declined. In the latter years of the Resort license, some facilities deteriorated rapidly due to age and rehabilitation costs. In 2001, numerous cabins were damaged by storms and were not repaired by the licensee. Resort operations began to experience a gradual decline in use that culminated in 2010 with TVA's termination of the license.



Figure 2. Aerial View of Watts Bar Marina and Resort.



Figure 3. Former Restaurant and Gift Shop Building (TRC 2011).



Figure 4. Cabins Formerly Part of Watts Bar Marina and Resort (TRC 2011).



Figure 5. Swimming Pool Formerly part of Watts Bar Marina and Resort (TRC 2011).

Other Environmental Reviews and Documentation

Natural Resource Plan (TVA 2011a)

The NRP and associated environmental impact statement (EIS; TVA 2011b) contain a description of recreation facilities and activities on TVA lands including Watts Bar Reservoir. TVA's goals and strategies for managing developed recreation are described in the NRP.

Watts Bar Reservoir Land Plan (WBRLMP) Environmental Impact Statement (EIS; TVA 2009)

The WBRLMP EIS describes TVA-managed lands around the reservoir, including parcel 300 where the Resort is located. In that document is a description of suitable activities for each parcel and recreation opportunities on the reservoir.

Categorical Exclusion Checklist Number 25187

On October 17, 2011, TVA initiated an environmental review using a categorical exclusion checklist. Results of the analysis indicated that the proposed action does not qualify for a categorical exclusion and that preparation of an environmental assessment is necessary. The checklist is provided in Appendix A.

Permits, Licenses, and Approvals

The contractor, under TVA supervision, would submit an Asbestos Demolition Notice to the Tennessee Division of Environmental Conservation (TDEC) 10 days prior to commencing demolition activities.

If temporary sanitary facilities are used on site, TVA would obtain a State Operation Permit from the TDEC, Division of Water Pollution Control, to operate a pump and haul system to dispose of sewage, as appropriate. No other permits, licenses, or approvals are required.

Alternatives

The Resort buildings are outdated and most have sustained considerable damage. Any hazardous materials present would need to be removed and properly disposed of before taking action on the buildings. Reuse of the Resort structures would require extensive remodeling and, in some instances, demolition and rebuilding. Given these conditions, there is little to no potential for removal of the buildings for re-use elsewhere. Results of a study conducted to support the WBRLMP indicated that while there is high demand for public boat access, campgrounds, and dispersed recreation opportunities, demand for marinas and lodging is lower (TVA 2009). Therefore, restoration of existing Resort buildings is not a feasible undertaking for TVA. TVA has determined that from the standpoint of the National Environmental Policy Act (NEPA), there are two alternatives available to TVA: the No Action Alternative and demolition and removal of Watts Bar Marina and Resort. These alternatives are summarized below.

No Action Alternative

Under this alternative, TVA would take no action. The cabins, marina, restaurant and other structures would be left in place. The buildings are not heated, cooled, supplied with electricity, or otherwise maintained. Extensive deterioration of the facility is evident, and further degradation from exposure to weather, vandalism, and aging is expected. TVA would continue to limit access to the site. There would be no change in the designation of Parcel 300 for developed recreation.

Action Alternative – Demolition and Removal of Watts Bar Resort

Under the Action Alternative, the cabins, restaurant, marina, and associated structures would be demolished and the debris removed. Demolition activities are expected to last three weeks.

Plans call for removing or demolishing the following structures:

- Thirty-eight cabins constructed of wood with asphalt roofing and glass windows. Portions of these structures that are above ground would be removed. Cement block foundations would be left in place, except exposed cement blocks would be removed. Miscellaneous furniture and appliances left in some cabins would be disposed of. Window air conditioning boxes are present, but the inner mechanical parts have been removed.
- The former restaurant, which is constructed of brick, wood, cement block, dropped ceiling tile, glass windows, asphalt roof tiles.
- A small wooden building constructed of the same materials as the cabins.
- The marina building, which is constructed of corrugated metal, steel, wood, and concrete. The concrete slab foundation would not be disturbed. A large above-ground fuel tank, associated piping, and equipment/materials associated with the marina would be removed. A small corrugated metal shed near the marina building would also be removed.
- One large and two small swimming pools would be filled with soil or approved demolition debris, covered with a layer of dirt, and reseeded. Metal fixtures and fencing would be removed. Metal playground structures would be removed.

TVA would hire a licensed contractor experienced with deconstruction activities. All work would be performed in accordance with the current federal Occupational Safety and Health Administration (OSHA), U.S. Environmental Protection Agency, Tennessee OSHA, and TDEC rules and regulations. Environmental practices required of the contractor are described in Appendix B. TVA would retain oversight authority for the project, including oversight for the proper handling and disposal of any hazardous, special, or universal waste generated during the project. The deconstruction activities planned and performed by TVA's contractor would be described in project work plans. These plans would be submitted by the contractor to TVA for approval. Project work plans would provide detailed descriptions of planned work scope, documentation that required training has been completed, methods to identify and characterize potential waste sources, spill planning, and the process for handling and disposing of all types of waste.

Except for clean concrete, masonry, and brick that can be used as fill, other demolition debris would be hauled off site in trucks to an approved landfill. Paved and gravel roads would be left in place. Piping that cannot be removed would be emptied and capped.

Electrical wires, poles and transformers serving these buildings would be de-energized and left in place for future service. There would be no other changes to the existing transmission infrastructure.

No trees would be removed, and there would be no excavation. Minor amounts of clean fill from an approved, off-site, commercial source would be used to backfill small areas as necessary. Disturbed soil would be covered with straw and reseeded with native or noninvasive nonnative species. Soil disturbance would not exceed one acre.

Generators used to supply power for demolition activities would be subject to best management practices (BMPs) specified in a required Spill Prevention Control and Countermeasures plan (e.g. installation of secondary containment structures, double-walled fuel containment).

Preferred Alternative

TVA's preferred alternative is the Action Alternative. Implementing the Action Alternative would resolve potential environmental risks associated with the deteriorating facility. Additionally, removal of the dilapidated structures may improve the feasibility of restoring the site for recreational purposes.

Affected Environment and Anticipated Impacts

Site Description

The Resort is located on 185 acres northwest of the Watts Bar Dam along the right descending bank of the Tennessee River. The property is on Watts Bar Reservoir, with a portion overlooking the main Tennessee River channel, and a portion on Fugate Bay, an inlet off the channel. The terrain consists of a series of winding ridge lines cut by deep ravines. The main resort facilities are located atop the crests of several ridge lines. The parcel is mostly forested (Figure 2). Much of the undeveloped areas are covered with a mix of maturing second growth hardwood trees, kudzu vines, and some patches of dense underbrush. Downed pine trees are common some areas. Roads leading into the Resort are blocked with concrete barriers or locked gates. Areas around the resort entrances, cabins, and marina building are covered with gravel driveways or sparse grass.

Impacts Evaluated

During preparation of categorical exclusion checklist number 25187, TVA determined that the proposed demolition activities would have no impact to natural features, such as unique or important terrestrial and aquatic habitats; wetlands; prime or unique farmland; natural areas; threatened or endangered species; Wild and Scenic Rivers; floodplains; and groundwater. The proposed action would not affect socioeconomic resources, environmental justice, or transportation. The potential for the proposed action to generate nuisance noise or contribute to the spread of exotic or invasive species is minor. Proposed demolition activities would result in the emission of negligible amounts of air pollutants and greenhouse gases (e.g., carbon dioxide) and therefore would not affect air quality or climate. Therefore, these resources are not addressed further in this EA.

TVA implemented a survey of the Resort property to identify archaeological resources (TRC 2011). The area of potential effects (APE) for archaeological resources is the 185-acre Resort property. One archaeological resource was identified consisting of a small pile of bricks. However, it was determined ineligible for the National Register of Historic Places (NRHP). The only landforms in the vicinity identified as having a high potential for archaeological resources are permanently inundated by Watts Bar Lake and are located outside the APE. The Tennessee State Historic Preservation Officer (SHPO) concurred (Attachment C). Due to the lack of archaeological resources on the Resort property, the

proposed action would not result in impacts, and archaeological resources are not discussed further in this EA.

Resources that could be affected by the proposed action have been given further consideration in this EA and include historic structures, recreational areas, visual resources, water quality, and solid, hazardous, and special waste.

Historic Structures

TVA determined the APE for historic architectural resources to be the 185-acre Resort property and all standing structures within the property. TVA researched its records and conducted a background literature and records search of Rhea County NRHP listings and pending files of architectural resources located at the Tennessee Historical Commission in Nashville. Based upon this information, no previously inventoried architectural resources or NRHP-listed properties are located within the APE of the project area.

An architectural survey of the APE was conducted to evaluate the potential eligibility of individual structures and of the group of structures as a potential historic district (TRC 2011). TVA evaluated all of the existing structures on the Resort property. These consist of 38 former family houses, playground equipment, and a relocated service station building that were originally part of Watts Bar Village, along with a cafeteria and gift shop building, a marina tackle shop, two swimming pools, a boat dock, and a pair of tennis courts that were built in the 1950s as part of the Resort. The service station building has been moved from its former location on the entrance road near the cafeteria to another location within the project area. The rest of the existing buildings are in their original locations.

The majority of the buildings within the APE have received some level of interior alterations within the past thirty years. These include remodeling and replacing of original fixtures. Exterior alterations to the houses include the removal of the original metal roofs and chimneys, which were character defining features of the single family houses as they were designed in 1939, and the covering of roofs with asphalt shingles.

The physical integrity of the remaining buildings has been compromised as a result of long term neglect and vandalism. The failure of roof systems has led to water penetration and the consequent collapse of interior ceilings in some cabins. In addition, vegetation growth has occurred in several buildings as a result of doors and windows being left open. This has led to the separation of the exterior fiber board panels from the building frame and has accelerated the deterioration of the interior spaces.

Some buildings have been vandalized, resulting in damage to interior walls and the theft of sinks, toilets, and lighting fixtures. In addition, at least two of the houses have been identified by TVA Police as being contaminated with hazardous materials due to the illicit production of methamphetamine.

As a result of the poor integrity of the buildings formerly associated with Watts Bar Village, and later Pete Smith's Watts Bar Resort and the Watts Bar Marina and Resort, TVA finds that all of the individual structures of the Resort are ineligible for the NRHP due to a loss of physical integrity caused by modern alterations, neglect, and vandalism. Additionally, in the case of two former Watts Bar Village houses, ineligibility is also due to contamination from hazardous materials. TVA finds further that the buildings and structures of Watts Bar Marina and Resort lack sufficient integrity to be listed on the NRHP as a historic district due to the demolition of all of the auxiliary buildings formerly associated with

the construction of the dam and steam plant. TVA finds that, due to the loss of these features, the Resort no longer retains integrity of design, setting, and feeling as it relates to both Watts Bar Village and Watts Bar Marina and Resort. In a letter dated November 7, 2011, the Tennessee SHPO concurred that the project area contains no historic properties eligible for listing on the NRHP (Attachment C). Therefore, there would be no direct, indirect, or cumulative effects to NRHP eligible or listed properties under either the Action Alternative or No Action Alternative.

Recreational Areas

There are 67 developed recreation areas on TVA-managed lands on Watts Bar Reservoir (TVA 2009). Twenty-six are commercial recreation areas operated by private entities, most of which are resorts or marinas that offer such facilities as boat slips, boat rentals, swimming beaches, picnic areas, supply stores, restaurants, camping, rooms or cabins, and other recreation facilities. Thirteen developed recreation areas on Watts Bar Reservoir offer cabins and amenities similar to those formerly provided at the Watts Bar Marina and Resort (TVA 2011c). A public boat ramp is available at the adjacent Watts Bar Dam.

In the WBRLMP, TVA designated Parcel 300, on which the Resort is located, as Zone 6, Developed Recreation (TVA 2009). Types of development that may occur on Zone 6 lands includes water access, commercial recreation, developed recreation, and greenways.

Due to the termination of the commercial license agreement, the Resort currently does not provide recreational opportunities. Therefore, implementing the No Action Alternative or the Action Alternative would result in no immediate changes in recreation opportunities on Watts Bar Reservoir. However, under both the No Action Alternative and the Action Alternative, the parcel would still be designated as Zone 6, suitable for developed recreation in the future. TVA's Natural Resource Plan indicates that new recreation facilities on TVA reservoirs would primarily be provided by other public and private agencies (TVA 2011a). TVA would consider future proposals for restoration and development of the parcel, provided the proposals are consistent with the WBRLMP, TVA's Land Policy, the 2010 Commercial Recreation Management Guideline, and any other applicable permits, regulations, and guidance. Under the No Action Alternative, the continued presence of dilapidated cabins, restaurant, and marina building may decrease the feasibility of restoring the facility to recreational use. Conversely, implementing the proposed action would increase the suitability of the site for re-use. Enhancing the potential for restoration of developed recreation on Parcel 300 could result in positive indirect and cumulative effects on recreation in the area. However, given the numerous recreational opportunities available on Watts Bar Reservoir, those effects would be minor.

Visual Resources

A few of the southernmost Resort structures, including the former restaurant, are visible from SR 68. However, because the site is forested, most of the cabins, the swimming pools, playground equipment, and other facilities are hidden from view from the roadway. The marina building and docks would be visible to boaters traveling along Fugate Bay, but would not be seen from the main channel of the Tennessee River.

Neither the No Action Alternative nor the Action Alternative would completely restore a natural view to the Resort area. A 161-kilovolt line and towers, smaller electric lines, the marina docks and a single tennis court would not be removed under either alternative. Therefore, no substantive cumulative impact to visual quality would be expected under either alternative.

Under the No Action Alternative, leaving Resort facilities in place would adversely affect visual resources. However, because very little of the facilities are visible to the public, the impact would be minor. No indirect or cumulative adverse impacts to visual resources would occur.

Under the Action Alternative, removal of the dilapidated facilities is expected to have a minor positive impact on visual quality of the area around the Resort. Given the limited visibility of the Resort facility, no measureable indirect or cumulative impact on visual resources would result from implementation of this alternative.

Solid, Hazardous, and Special Waste

Currently, no trash, demolition debris, hazardous or special waste is removed from the Resort. Under the No Action Alternative, there would be no change with respect to removal of waste and management of potential environmental hazards.

Under the No Action Alternative, the amount of trash and debris on the site would increase. Hazardous materials currently in or on the structures (e.g., lead in paint, asbestos in building materials, polychlorinated biphenyls (PCBs) in light fixtures, oil or chemicals stored in buildings) could be released into the environment as the structures degrade. Based upon a preliminary site visit, little or no hazardous waste, oil, or mercury is expected to be present. Except for a small amount of non-friable (not easily made airborne) asbestos, little or no asbestos-containing materials are expected to be present. The potential effect of trash, debris, and hazardous materials on the environment would be expected to be small.

Under the Action Alternative, waste removed would include brick, concrete, wood, metal, glass, steel, roof shingles, and ceiling tiles. Except for a small amount of suitable materials (concrete, brick) used to fill the former swimming pools, such demolition debris would be transported to an approved off-site landfill. Prior to demolition activities, surfaces having potential to contain hazardous materials would be sampled, and any such materials would be segregated and handled in accordance with federal and state regulations. A Tennessee Licensed asbestos inspector would survey buildings for asbestos prior to demolition. Asbestos detected during the inspection would be removed in accordance with OSHA asbestos regulations (Standards-29 CFR 1926.1101), and the State regulations (Rule 1200-03-11-.02) promulgated under the Tennessee Air Quality Act (T.C.A. §§ 68-201-101 et seq.). Any chemicals, used oil, or universal waste found would be characterized and removed prior to demolition. Electrical items or equipment to be removed would be tested for polychlorinated biphenyls (PCBs). Electrical equipment that cannot be effectively tested, light ballasts, and small capacitors would be disposed of according to regulations applying to PCB waste.

With the measures and controls described above, there would be no or negligible release of these materials to the environment. Potential spills or discharges would be contained and cleaned up immediately. No measureable direct, indirect, or cumulative adverse impacts to the environment with respect to solid, hazardous, and special wastes are anticipated.

Surface Water

Adoption of the No Action Alternative would not affect surface water.

Removal of the marina building and associated structures has the potential to disturb ground near the reservoir, possibly resulting in run-off of contaminants or sediment into the reservoir. Throughout deconstruction activities, TVA would implement routine BMPs to

prevent materials from entering surface water in the reservoir. Measures may include placement of straw bales or silt fences, covering disturbed soil with mulch and seeding of exposed soil to promote revegetation. The implementation of BPMs would avoid direct, indirect, and cumulative impacts to surface water.

TVA Preparers

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Richard W. Yarnell, Archaeologist, National Historic Preservation Act Section 106 compliance

Agencies and Others Consulted

- Tennessee Historical Commission, Nashville Tennessee
- Cherokee Nation, Eastern Band of Cherokee Indians
- United Keetoowah Band of Cherokee Indians in Oklahoma
- Muscogee (Creek) Nation of Oklahoma
- Alabama-Coushatta Tribe of Texas
- Alabama-Quassarte Tribal Town
- Kialegee Tribal Town
- Thlopthlocco Tribal Town
- Seminole Tribe of Florida
- Absentee Shawnee Tribe of Oklahoma
- Eastern Shawnee Tribe of Oklahoma
- Shawnee Tribe of Oklahoma.

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- _____. 2011a. *Tennessee Valley Authority Natural Resource Plan*.
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- _____. 2011c. Recreation Area Matrix: Watts Bar Reservoir. http://www.tva.com/river/recreation/pdf/watts_bar_rec_matrix.pdf accessed October 24, 2011.
- TRC. 2011. *Phase I Cultural Resources Survey of the Watts Bar Resort Property, Rhea County, Tennessee*. Draft Report. October 2011. 108 pp.

Attachments

- A. Environmental Practices
- B. Categorical Exclusion Checklist 25187
- C. Correspondence with the Tennessee Historical Commission

Attachment A. Environmental Practices

ENVIRONMENTAL CONSIDERATIONS

All Watts Bar Marina and Resort Demolition activities shall include the environmental compliance standards and meet all expectations of Tennessee Valley Authority as a federal agency. Contractors and all Subcontractors shall be responsible for complying with all Federal and State laws, including, but not limited to, any statute, rule, regulation, judgment, decree, order or permit applicable to local government requirements.

Below is a preliminary list of suspected environmental concerns. Prior to any actions generating or affecting these environmental issues coordination with TVA Environmental Support Staff during the pre-decommissioning and demolition planning process through meetings, workplans or waste minimization plans will be required.

Asbestos - Contractors as well as all subcontractors must be trained and follow federal, state and local regulations. Including but not limited to: 40 CFR Part 763, 29 CFR 1910, 29 CFR 1915, TN Code 68 Chapter 201 TN 1200-03

Mercury Containing Equipment- Contractors as well as all subcontractors must be trained to safely remove these articles without releases and follow federal, state and local regulations. Including but not limited to: 40 CFR 273, TN Rules 1200-01-11-.01 through .10.

PCB and PCB contaminated Materials- Contractors as well as all subcontractors must be trained and follow federal, state and local regulations. Including but not limited to: 40 CFR 761

Solid/Hazardous/Universal Waste Generation- Waste generation status should be tracked. All wastes and disposal must be coordinated through TVA Site Environmental Support. Contractors as well as all subcontractors must be trained and follow federal, state and local regulations. Including but not limited to: 40 CFR 260 - 273, TN Rules 1200-01-11-.01 through .12.

Lead Paint - Contractors as well as all subcontractors must be trained and follow federal, state and local regulations. Including but not limited to: 40 CFR Parts 700-799 as well as OSHA exposure requirements

Chemicals of Concern and Oil - Contractors as well as all subcontractors must be trained and follow federal, state and local regulations. Including but not limited to: 40 CFR Parts 700-799, 40 CFR Part 279 and TN 1200-1-11-.11

All Contractor and Subcontractor training, certifications, and all project recordkeeping must be current and able to be accessed from site files by TVA Environmental Site Personnel.

Environmental Events or non compliances which require notification to, or lead to enforcement action by; Federal, State, or local regulatory agencies shall be brought to TVA Site Environmental Contact as soon as possible. Contractor agrees to immediately notify TVA Site Environmental Personnel of any environmental issues which occur at any time of deconstruction activities during the term of a Project Authorization, and to provide TVA Site Environmental Personnel with reasonable additional information about such issues as requested. TVA Site/Corporate Environmental Personnel will determine if issue constitutes an REE.

1. ENVIRONMENTAL CONSIDERATIONS

As a condition precedent to award of a Project Authorization, Contractor and any subcontractors known and designated at the time of site vacancy shall have submitted to the TVA Technical Contract Manager an Environmentally Acceptable Deconstruction Certification. Contractor agrees that submittal of said certification by potential subcontractors shall be a condition precedent to award of any subcontracts issued for performance of Work as required by a Project Authorization. If during the life of a Project Authorization, Contractor or any of its subcontractors should receive any communication from the Director, Office of Federal Activities, Environmental Protection Agency (hereinafter "EPA"), or and State or Local Environmental Agency Contractor shall immediately transmit a copy of such communication to the TVA Technical Contract Manager. All additional costs incurred by Contractor in performance of the Work required by a Project Authorization as a result of this requirement to cease use shall be at its expense and shall not be considered as reimbursable under any Contract terms of payment. Throughout performance of its Work, Contractor shall conduct all operations in such a way as to minimize impact upon the natural environment and comply with environmental laws, regulations, and rules applicable to the jobsite.

- 1.1. No substances listed as hazardous under any Federal, State, or local law or regulation shall be brought onto or used on or within TVA facilities until TVA Site Environmental Personnel receives from Contractor a written statement setting forth (1) the exact name and quantity of the hazardous materials to be brought onto the TVA facilities, (2) the reason for bringing the hazardous materials onto TVA facilities, (3) the protective practices to be instituted, and (4) the countermeasures and cleanup practices to be used in the event of a release. If a release occurs, Contractor will notify TVA Site Environmental Personnel immediately and in any event within twenty-four (24) hours.
- 1.2. Contractor shall conduct its activities in connection with the performance of this Contract in such a way as to minimize, in so far as is reasonably possible, the impact on the environment and shall assist TVA in carrying out commitments contained in the Environmental Assessment Document, if such documents are applicable to a Project Authorization as well as such other environmental commitments as TVA may have made in relation to the Work to be undertaken by Contractor under a Project Authorization, and provided to Contractor in writing. In considering the impact of its activities upon the environment, Contractor shall take into account such factors as, among other things, air pollution, erosion control, noise control, solid waste disposal, and waste water disposal. TVA Site Environmental Personnel will monitor all Contractor's or Subcontractor's activities and initiate requests for corrective actions as required.
- 1.3. Additionally, TVA seeks to make environmental quality an integral part of the way TVA and its suppliers do business. Specifically, TVA seeks to reduce "Reportable Environmental Events" (REEs) (occurrences which violate environmental regulatory requirements, and which require notification to, or lead to enforcement action by; Federal, State, or local regulatory agencies). Contractor agrees to immediately

notify TVA Site Environmental Personnel of any environmental issues which occur at any of Contractor's facilities or work sites at any location related to the Work under a Project Authorization during the term of a Project Authorization, and to provide TVA Site Environmental Personnel with reasonable additional information about such issues as requested. TVA Site/Corporate Environmental Personnel will determine if issue constitutes an REE.

1.4. Handling and Disposal of Hazardous Waste and Used Oils

- 1.4.1. Throughout the performance of Work covered by this Contract, Contractor shall comply with all applicable laws and regulations, including training requirements, and TVA specific requirements pertaining to the management of hazardous waste and used oils. TVA Site Environmental Personnel will provide assistance and direction regarding the TVA site specific requirements. TVA Site Environmental Personnel must be notified immediately upon the generation of any hazardous waste or used oil, and the handling and disposal of all hazardous wastes or used oils shall be coordinated with TVA Site Environmental Personnel.
- 1.4.2. The Contractor shall provide a project-specific hazardous waste minimization plan to the TVA Site Environmental Personnel within thirty (30) days of the establishment of the Target Cost Estimate. This plan shall include a complete listing of all such materials expected to be used, an estimate of the waste types and amounts expected to be generated and a description of the methods used to minimize waste. TVA Site Environmental Personnel shall have input into this plan.
- 1.4.3. TVA will be considered the generator of the hazardous waste and will coordinate with the contractor for its disposal, including the costs for disposal, at a facility approved by TVA. Notwithstanding the previous statement regarding who is considered to be the "generator" of the waste/oil from purchased equipment as in scope of demolition, the Contractor will only be held responsible for the costs of arranging for and performing the clean up, disposal and the reasonable restoration directly related to used oil or hazardous waste which may be created on or brought on to, the project site by Contractor, its subcontractors, or their agents or representatives. Contractor shall be liable or responsible handling for any hazardous waste or under the site (other than that which may be created on or brought on to, the site by Contractor, its subcontractors, or their agents or representatives) or created or brought to the site by any party or entity other than Contractor, its subcontractor or their agents or representatives.

1.5. Handling and Disposal of Other Wastes (Solid and Special Waste)

Solid and Special Waste will be handled on a case-by-case basis, depending on factors such as amount and type of solid or special waste generated. Since States and local landfills have their own definition of special waste, the TVA Site Environmental Personnel should be contacted for guidance regarding the need and acquisition of a Special Waste Permit. Permits are typically required for special waste.

1.6. Solid Waste Disposed-of by Contractor

Contractor is responsible for arranging the disposal of this non-hazardous material. Contractor will provide amounts (weights) disposed-of to the TVA Site Environmental Personnel contact as required for incorporation into Agency reporting.

1.7. Hazardous Chemicals

At the time materials contracted for hereunder are delivered, Contractor shall furnish to TVA a Material Safety Data Sheet (MSDS), marked with the TVA Contract number and Project Authorization number, for each hazardous chemical, as that term is defined in the Occupational Safety and Health Administration's (OSHA) hazard communication regulations published at 29 C.F.R. § 1910.1200. Contractor shall also send a copy of the MSDS to the TVA Employee Service Center, 400 West Summit Hill Drive, WT CP-K, Knoxville, Tennessee 37902. Contractor shall also label each container of a hazardous chemical in accordance with the labeling requirements of the OSHA hazard communication regulations. TVA shall be entitled to use the MSDS and the container labels for its internal safety and health purposes and for any other purpose (including, without limitation, hazard communication on resale) contemplated by the OSHA hazard communication regulations.

1.8. Hazardous Materials Transportation, Other Transportation Laws and Rules

It is Contractor's responsibility to abide by all applicable Federal transportation laws and regulations including, without limitation, laws and regulations related to the licensing of commercial motor vehicle drivers, and laws and regulations related to transportation security. Evidence that drivers have one (and only one) commercial motor vehicle driver's license with all required endorsements for the load may be requested by TVA, and shall be provided to TVA by Contractor upon request. If Contractor will be transporting hazardous materials of a quantity or type requiring it to have in place a Transportation Security Plan (TSP) in accordance with Federal transportation laws and regulations, Contractor shall provide TVA certification via letter or other method as specified by the TVA Contracting Officer that it has a TSP that meets all applicable requirements. Contractor agrees to supply to TVA upon request of the TVA Contract Manager a copy of its TSP. Additionally, Contractor shall be responsible for securing compliance by its employees and subcontractors with all applicable Federal transportation laws and regulations and with this clause, and shall include this clause in its contracts with its subcontractors.

1.9. Recovered/Recycled Materials

Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), imposes certain requirements on Federal agency procurements involving items containing materials recovered from solid waste. Guidelines issued by the Environmental Protection Agency (EPA) under Section 6002 have designated certain products as products for which affirmative procurement actions are required. Accordingly, if in connection with contracts for the above products, two or more otherwise identical low offers are received which offer different levels of recovered materials, a preference will be given to the offer with the highest level of recovered materials.

1.10. Certification

1.10.1. Contractor, by entering into a Project Authorization, certifies:

- A) The percentage of recovered material and total quantity of recovered material to be supplied by Contractor will be approximately that amount set forth in the corresponding Project Authorization;
- B) The Contractor's records and facilities will be made available to TVA upon request, for inspection or audit, to assure that any of products and materials diverted as salvaged materials do not have any additional environmental hazards associated with them.
- C) Upon completion of a Project Authorization, the amount of recovered material that was actually repurposed.

Chemicals or Products

Contractor shall bring onsite only the amount of a chemical or product anticipated to be used during a Project Authorization. All chemicals to be used on a TVA site must have prior approval (before being brought onsite) by the assigned TVA Site Environmental Personnel. Any excess chemicals not used during a Project Authorization shall remain the property of Contractor, and, unless the TVA Site Environmental Personnel authorizes retention of the material onsite, shall be removed from the site by Contractor. Contractor shall comply with any applicable DOT regulations for transporting the chemicals offsite. This may include providing a DOT-trained person to sign the shipping papers.

Attachment B. Categorical Exclusion Checklist 25187

Categorical Exclusion Checklist for Proposed TVA Actions

Categorical Exclusion Number Claimed	Organization ID Number	Tracking Number <i>(NEPA Administration Use Only)</i> 25187
Form Preparer R. Lesley Rogers	Project Initiator/Manager Donald Crabtree	Business Unit E&T - Land & Shoreline Management
Project Title WB Village Deconstruction		Hydrologic Unit Code
Description of Proposed Action <i>(Include Anticipated Dates of Implementation)</i> <input type="checkbox"/> Continued on Page 3 <i>(if more than one line)</i> The removal of structures and buildings to remove health and safety risks.		
Initiating TVA Facility or Office Watts Bar Fossil Plant	TVA Business Units Involved in Project	
Location <i>(City, County, State)</i> Rhea, TN, This would include the areas beside the marina, watts bar village, and restaurant		

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

Part 1. Project Characteristics

Is there evidence that the proposed action---	No	Yes	Information Source
1. Is major in scope?	X		For comments see attachments
2. Is part of a larger project proposal involving other TVA actions or other federal agencies?	X		Rogers R. L. 09/26/2011
*3. Involves non-routine mitigation to avoid adverse impacts?	X		Rogers R. L. 09/26/2011
4. Is opposed by another federal, state, or local government agency?	X		Rogers R. L. 09/26/2011
*5. Has environmental effects which are controversial?	X		Rogers R. L. 09/26/2011
*6. Is one of many actions that will affect the same resources?	X		Rogers R. L. 09/26/2011
7. Involves more than minor amount of land?	X		Rogers R. L. 09/26/2011

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

Part 2. Natural and Cultural Features Affected

Would the proposed action---	No	Yes	Per- mit	Commit- ment	Information Source for Insignificance
1. Potentially affect endangered, threatened, or special status species?	X		No	No	For comments see attachments
2. Potentially affect historic structures, historic sites, Native American religious or cultural properties, or archaeological sites?		X	No	No	For comments see attachments
3. Potentially take prime or unique farmland out of production?	X		No	No	Rogers R. L. 09/26/2011
4. Potentially affect Wild and Scenic Rivers or their tributaries?	X		No	No	For comments see attachments
5. Potentially affect a stream on the Nationwide Rivers Inventory?	X		No	No	For comments see attachments
6. Potentially affect wetlands, water flow, or stream channels?		X	No	No	For comments see attachments
7. Potentially affect the 100-year floodplain?	X		No	No	Rogers R. L. 09/26/2011
8. Potentially affect ecologically critical areas, federal, state, or local park lands, national or state forests, wilderness areas, scenic areas, wildlife management areas, recreational areas, greenways, or trails?		X	No	No	For comments see attachments
9. Contribute to the spread of exotic or invasive species?	X		No	No	For comments see attachments
10. Potentially affect migratory bird populations?	X		No	No	For comments see attachments
11. Involve water withdrawal of a magnitude that may affect aquatic life or involve interbasin transfer of water?	X		No	No	Rogers R. L. 09/26/2011
12. Potentially affect surface water?	X		No	No	Rogers R. L. 09/26/2011
13. Potentially affect drinking water supply?	X		No	No	Rogers R. L. 09/26/2011
14. Potentially affect groundwater?	X		No	No	Rogers R. L. 09/26/2011
15. Potentially affect unique or important terrestrial habitat?	X		No	No	For comments see attachments
16. Potentially affect unique or important aquatic habitat?	X		No	No	For comments see attachments

Part 3. Potential Pollutant Generation

Would the proposed action potentially (including accidental or unplanned)---	No	Yes	Per- mit	Commit- ment	Information Source for Insignificance
1. Release air pollutants?	X		No	No	Rogers R. L. 09/26/2011
2. Generate water pollutants?	X		No	No	Rogers R. L. 09/26/2011
3. Generate wastewater streams?	X		No	No	Rogers R. L. 09/26/2011
4. Cause soil erosion?	X		No	No	Rogers R. L. 09/26/2011
5. Discharge dredged or fill materials?	X		No	No	Rogers R. L. 09/26/2011
6. Generate large amounts of solid waste or waste not ordinarily generated?	X		No	No	For comments see attachments
7. Generate or release hazardous waste (RCRA)?	X		No	No	For comments see attachments
8. Generate or release universal or special waste, or used oil?		X	No	No	For comments see attachments
9. Generate or release toxic substances (CERCLA, TSCA)?	X		No	No	Rogers R. L. 09/26/2011
10. Involve materials such as PCBs, solvents, asbestos, sandblasting material, mercury, lead, or paints?		X	No	No	For comments see attachments
11. Involve disturbance of pre-existing contamination?	X		No	No	Rogers R. L. 09/26/2011
12. Generate noise levels with off-site impacts?	X		No	No	Rogers R. L. 09/26/2011
13. Generate odor with off-site impacts?	X		No	No	Rogers R. L. 09/26/2011
14. Produce light which causes disturbance?	X		No	No	For comments see attachments
15. Release of radioactive materials?	X		No	No	Rogers R. L. 09/26/2011
16. Involve underground or above-ground storage tanks or bulk storage?	X		No	No	Rogers R. L. 09/26/2011
17. Involve materials that require special handling?		X	No	No	For comments see attachments

Part 4. Social and Economic Effects

Would the proposed action---	No	Yes	Commit- ment	Information Source for Insignificance
1. Potentially cause public health effects?	X		No	Rogers R. L. 09/26/2011
2. Increase the potential for accidents affecting the public?	X		No	Rogers R. L. 09/26/2011
3. Cause the displacement or relocation of businesses, residences, cemeteries, or farms?	X		No	Rogers R. L. 09/26/2011
4. Contrast with existing land use, or potentially affect resources described as unique or significant in a federal, state, or local plan?	X		No	For comments see attachments
5. Disproportionately affect minority or low-income populations?	X		No	Rogers R. L. 09/26/2011
6. Involve genetically engineered organisms or materials?	X		No	Rogers R. L. 09/26/2011
7. Produce visual contrast or visual discord?	X		No	For comments see attachments
8. Potentially interfere with recreational or educational uses?	X		No	Rogers R. L. 09/26/2011
9. Potentially interfere with river or other navigation?	X		No	Rogers R. L. 09/26/2011
10. Potentially generate highway or railroad traffic problems?	X		No	Rogers R. L. 09/26/2011

Part 5. Other Environmental Compliance/Reporting Issues

Would the proposed action---	No	Yes	Commit- ment	Information Source for Insignificance
1. Release or otherwise use substances on the Toxic Release Inventory list?	X		No	Rogers R. L. 09/26/2011
2. Involve a structure taller than 200 feet above ground level?	X		No	Rogers R. L. 09/26/2011
3. Involve site-specific chemical traffic control?	X		No	Rogers R. L. 09/26/2011
4. Require a site-specific emergency notification process?	X		No	Rogers R. L. 09/26/2011
5. Cause a modification to equipment with an environmental permit?	X		No	Rogers R. L. 09/26/2011
6. Potentially impact operation of the river system or require special water elevations or flow conditions??	X		No	Rogers R. L. 09/26/2011
7. Involve construction of a new building or renovation of existing building (i.e., major changes to lighting, HVAC, and/or structural elements of building of 2000 sq. ft or more) on which TVA will pay/pays the utilities??	X		No	Rogers R. L. 09/26/2011

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

An EA or EIS will be prepared.

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

Project Initiator/Manager Donald Crabtree		Date 10/18/2011
TVA Organization UNKN	E-mail dwcrastr@tva.gov	Telephone

Site Environmental Compliance Reviewer

Final Review/Closure

_____ <i>Signature</i>	R. Lesley Rogers _____ <i>Signature</i>
	10/18/2011

Other Review Signatures (as required by your organization)

R. Lesley Rogers _____ <i>Signature</i>	10/17/2011 _____ <i>Signature</i>
_____ <i>Signature</i>	_____ <i>Signature</i>
_____ <i>Signature</i>	_____ <i>Signature</i>

Attachments/References

CEC Comment Listing

Part 1 Comments

- WB Resort DOPPA document
By: R. Lesley Rogers 09/27/2011
Files: Watts Bar Resort Demo DOPAA.docx 09/27/2011 1,143,889 Bytes

Part 2 Comments

CEC Comment Listing

1. A 7 October 2011 query of the TVA Heritage database indicates that no federal listed species and six state-listed plant species of conservation concern are known from within five miles of Watts Bar Village and Marina in Rhea County, TN (Table 1). After review of maps, photographs, and knowledge of rare plants in the vicinity, the area around the demolition sites have been impacted by human disturbances and would unlikely provide suitable habitat for rare plants species. Therefore, the proposed action is not expected to result in impacts to rare plant populations. No permits or commitments are required
By: Patricia B Cox 10/07/2011
Files: 25187_Botany Input_Demolition of watts bar village_Plant Table x.docx 10/07/2011 15,646 Bytes
1. See attached input for aquatics.
By: Charles S. Howard 10/14/2011
Files: CEC_25187_AQUAT_Input_csh.docx 10/14/2011 23,515 Bytes
CEC_25187_AQUAT_TAB1.docx 10/14/2011 18,428 Bytes
1. Review of terrestrial animals in the TVA Natural Heritage database in October 2011, found records of one Tennessee state-listed species (hellbender) and one federally protected species (bald eagle) within a three-mile radius of the project area. The review found records of one federally listed species occurring within Rhea County, TN. See species table 18767_TerrZoo_SpeciesTable.docx. The nearest gray bat record for Rhea County is approximately four miles away from the project area. This species is associated with caves year-round and forages over water bodies during summer months. No recorded caves occur near the project area, however abundant foraging habitat does occur near the project site. This species would not be affected by the proposed actions. The nearest nesting bald eagle record occurs approximately 2.7 miles from the project area. This species prefers to nest in trees large and strong enough to support their giant nests. These are usually among the largest trees near the bodies of water where it forages. This record is an adequate distance from the project area and this species would not be affected by the proposed actions. Based on the desktop review, impacts to federal or state-listed species or their habitats are not expected to occur as a result of the proposed actions.
By: Charles Hofer 10/13/2011
Files: 18767_TerrZoo_SpeciesTable.docx 10/13/2011 19,361 Bytes
2. These structures are part of a village that was used for many years as part of TVA's history. However, due to the poor condition of them and the security risk they are being removed.
By: R. Lesley Rogers 09/26/2011
2. Because the resort is greater than 50 years old, and formerly was the construction village for the Watts Bar Dam and Fossil plant, it has potential historic value. TVA is conducting studies of the historic and archaeological resources at the village, and will conduct any appropriate consultation pursuant to the National Historic Preservation Act.
By: Amy B. Henry 10/17/2011
4. For Part 2, #4 - Potentially affect Wild and Scenic Rivers or their tributaries? No – Heather M. Hart Commitment: None
Comments: Because no such designated waters occur at or adjacent to the project site, the proposed action is not anticipated to impact Wild and Scenic Rivers or their tributaries.
By: Heather M. Hart 10/14/2011
5. For Part 2, #5 - Potentially affect a stream on the Nationwide Rivers Inventory? No – Heather M. Hart Commitment: None
Comments: Because no such designated waters occur at or adjacent to the project site, the proposed action is not anticipated to impact Nationwide Rivers Inventory streams or their tributaries.
By: Heather M. Hart 10/14/2011
6. No wetlands are present within the proposed project area; no wetland impacts will occur.
By: Kim Pilarski 10/14/2011
6. See attached input for aquatics.
By: Charles S. Howard 10/14/2011
8. Although this is a recreational area this restaurant, cabins, and marina have been closed for several years.
By: R. Lesley Rogers 09/26/2011
8. For Part 2, #8 - Potentially affect ecologically critical areas, federal, state, or local park lands, national or state forests, wilderness areas, scenic areas, wildlife management areas, recreational areas, greenways, or trails? No– Heather M. Hart Commitment: None
Comments: A review of the TVA Natural Heritage Database indicates there are four natural areas

within 1.0 mile of the proposed project. One additional natural area is within 3.0 miles of the proposed project. Meigs County Park is located 0.5 mile east of the proposed project. Chickamauga Reservoir State Mussel Sanctuary is located 1.0 mile south within the boundaries of the reservoir from the dam at Watts Bar (TRM 529.9) to the hunter navigation light (TRM 520.0). Chickamauga Shoreline Habitat Protection Area (HPA) is located 1.0 mile southeast across the reservoir from the proposed project. This HPA consists of 61 acres and is a shoreline tract that is a mixture of open fields and wooded land with steep banks along the lakeshore, providing habitat for Osprey and Bald Eagle. Watts Bar Wildlife Management Area (WMA) is located 0.5 mile east of the proposed project and is a 3880 acre area managed by Tennessee Wildlife Resources Agency (TWRA) for small and big game and waterfowl hunting. One additional natural area, Chickamauga WMA, is located 1.6 mile southwest of the proposed project. Because the distance is sufficient (0.5-1.6 mile) from the proposed project, for the type work indicated, no impacts to natural areas are anticipated. If you need further information regarding these findings, please contact: Heather M. Hart, TVA E&T Natural Areas Coordinator (hmhart0@tva.gov).

By: Heather M. Hart 10/14/2011

9. The demolition will result in soil disturbance that could potentially be a vector for the introduction of invasive species. With the condition to revegetate disturbed areas with native or non-native, non-invasive species, the potential for this project to contribute to the spread of exotic or invasive terrestrial plant species as directed by Executive Order 13112 will be minimized.

By: Patricia B Cox 10/07/2011

9. See attached input for aquatics.

By: Charles S. Howard 10/14/2011

9. Based on review of the actions (demolition of small buildings and infrastructure) and site location information, including maps provided by the project lead, the proposed project would not contribute to the spread of exotic or invasive terrestrial animal species.

By: Charles Hofer 10/13/2011

10. There are three recorded heronries located within three miles of the project area. The nearest recorded wading bird colony occurs more than 0.5 miles from the project area. This is an adequate distance away from the project site. Osprey have been documented nesting within three miles of the project area, however no nests have been documented within 660 feet of the proposed project area. Activities associated with the proposed project would not impact recorded wading bird colonies or other aggregations of migratory birds.

By: Charles Hofer 10/13/2011

15. No uncommon plant communities are known from the vicinity of the project area. Since the vegetation of the area is common and representative of the region, there is no known potential for this project, as described, to affect unique or important terrestrial plant communities.

By: Patricia B Cox 10/07/2011

15. There are no recorded caves or other habitats unique or important to terrestrial animals within three miles of the proposed project. Construction activities associated with the proposed project would not impact unique or important terrestrial habitats.

By: Charles Hofer 10/13/2011

16. See attached input for aquatics.

By: Charles S. Howard 10/14/2011

Part 3 Comments

6. On site fill must meet the < 1 acre requirement or be "clean" fill. Special waste requires state approval. Household or residential exclusion does not apply to any wastes generated from this project.

By: Kenneth F. Hickerson 09/30/2011

7. A waste determination must be made for all wastes.

By: Kenneth F. Hickerson 09/30/2011

7. Household or residential waste exemption does not apply to waste generated from the WB Village Deconstruction.

By: Kenneth F. Hickerson 09/30/2011

8. Wastes generated from this project are not subject to the household exemption.

By: Kenneth F. Hickerson 09/30/2011

8. All found chemicals and used oil must be characterized and removed prior to demolition.

By: Kenneth F. Hickerson 09/30/2011

CEC Comment Listing

8. Universal wastes must be collected and removed prior to actual demolition.
By: Kenneth F. Hickerson 09/30/2011
10. Electrical items or equipment to be removed must be tested for PCBs or assume PCBs > 500 ppm and dispose accordingly. Dispose of all light ballasts and small capacitors as PCB waste. In TN, lead based paint debris can be sent to an accepting C&D landfill. Buildings must be surveyed for asbestos prior to demolition using a TN licensed asbestos inspector. Threshold quantities of found friable asbestos must be removed and a 10 day renovation notification submitted to TDEC. Any nonfriable asbestos left in place must not be made friable by the demolition. Otherwise, nonfriable asbestos must be removed. All demolitions require a 10 day demolition to the TDEC prior to demolishing. With approval from TDEC, multiple structures may be listed on a single demolition notification. All asbestos work must use TN licensed asbestos professionals.
By: Kenneth F. Hickerson 09/30/2011
14. Lighting is not indicated for this project. Waste light is not anticipated.
By: W. Chett Peebles 10/12/2011
17. Asbestos, if found, would require special handling.
By: Kenneth F. Hickerson 09/30/2011

Part 4 Comments

4. Land use is expected to remain recreational.
By: W. Chett Peebles 10/12/2011
7. Removal of existing housing and associated structures is expected to have a positive impact on visual quality. The visual integrity of the landscape will be restored through the removal of structures that currently litter the landscape with visually contrasting elements. There are no negative impacts expected for visual resources.
By: W. Chett Peebles 10/12/2011

Terrestrial animal T&E Table 1. Federally listed terrestrial animal species reported from Rhea County, TN, and other species of conservation concern documented within three miles of the project associated with CEC 25187 (#18767).

Scientific Name	Common Name	State Status¹ (Rank²)	Federal Status
<i>Haliaeetus leucocephalus</i>	Bald eagle	NMGT (S3)	DM
<i>Myotis grisescens</i>	Gray bat ³	END (S2)	LE
<i>Cryptobranchus alleganiensis</i>	Hellbender	NMGT (S3)	--

¹Status abbreviations: DM: Recovered, delisted and being monitored; END: Endangered; NMGT: In need of management; LE = Listed Endangered

²State Rank: S2: imperiled; S3: rare or uncommon

³Federally-listed species that occur within the county where work would occur, but not within 3 miles of the project area.

Table 1: State-listed plant species reported from within five miles of the proposed project in Rhea County, TN

Common Name	Scientific Name	Federal status	TN State status/rank
Appalachian Bugbane	<i>Cimicifuga rubrifolia</i>	--	THR (S3)
Heavy Sedge	<i>Carex gravida</i>	--	SPCO (S1)
Northern Bush Honeysuckle	<i>Diervilla lonicera</i>	--	THR (S2)
Prairie Goldenrod	<i>Solidago ptarmicoides</i>	--	END (S1S2)
Slender Blazing Star	<i>Liatris cylindracea</i>	--	THR (S2)
Spreading False Foxglove	<i>Aureolaria patula</i>	--	THR (S3)

Status abbreviations: END=Endangered, THR = Threatened, SPCO=Species of special concern,
State rank abbreviations: S1 - critically imperiled with five or fewer occurrences; S2 – imperiled with six to 20 occurrences, S3=Rare or uncommon with 21 to 100 occurrences.

TVA CATEGORICAL EXCLUSION CHECKLIST (CEC) INPUT - AQUATIC ECOLOGY / T&E

DATE: 10/12/11
CEC # / RLR #: 25187 / -
PROJECT TITLE: WATTS BAR VILLAGE DECONSTRUCTION
CUSTOMER: Donald Crabtree E&T – Land & Shoreline Management
PREPARED BY: Charles S. Howard (Aquatic Endangered Species Biologist)
Craig L. Phillips (Aquatic Biologist Contractor)

Part 2, Q1 - Potentially affect endangered, threatened, or special status species? NO

Commitments: NO

Comments:

Review of the TVA Natural Heritage database (accessed Oct 12, 2011) indicated records of six federally listed as endangered (dromedary pearlymussel, fanshell, orangefoot pimpleback, pink mucket, rough pigtoe, and shiny pigtoe), one federally listed as threatened (snail darter), and six state-listed aquatic animal species within a ten-mile radius of the proposed Watts Bar Village Deconstruction (Aquatics Table 1). Ground disturbance would be minimized (one acre or less) and all work done in accordance to TVA's general and standard conditions and best management practices (BMPs; TVA 2005) with special emphasis on preventing waste material from entering the adjacent Watts Bar Reservoir. Removal of the marina structures would disturb aquatic habitat within a small cove of Watts Bar Reservoir. Since this area of the reservoir has little or no flow, it would not provide suitable habitat for any of the mussel species recorded near the site (Aquatics Table 1). Even pink mucket, which is known to tolerate reservoir conditions is still found in areas containing some consistent level of flow, which would not occur in the cove. Therefore, the project would have no effect on any state or federally listed mussels.

Similarly, the four fish species occurring near the site require stream habitat or habitat with at least moderate flow and conditions, which does not occur at the marina site. Therefore, the federally listed as threatened snail darter and three state-listed fishes would not occur at the project site and would not be affected by the proposed actions. Suitable habitat for the state-listed Cherokee clubtail (small, spring-fed streams) does not occur within the project area; therefore, it would not be impacted from the proposed actions.

Part 2, Q6 - Potentially affect wetlands, water flow, stream channels, or stream banks? YES

Commitments: NO

Comments:

Watts Bar Village deconstruction site occurs along the right descending bank of the Tennessee River at TRM 530. Removal of the marina and associated dock structures would include disturbance of the bank and riverbed adjacent the bank.. The marina building would be removed down to the concrete slab foundation and the floating docks and fuel tank would be removed. The concrete slab foundation would not be disturbed. Ground disturbance would be minimized during deconstructing activities and all work done in accordance to TVA's general and standard conditions BMPs with special emphases on preventing waste material entering the adjacent Watts Bar Reservoir. With proper implementation of BMPs, any impacts to the bank of Watts Bar Reservoir would be temporary and insignificant.

Part 2, Q9 - Contribute to the Spread of Exotic or Invasive Species? NO

Commitments: NO

Comments:

TVA BMPs require the use of clean equipment and materials for actions in or adjacent waterbodies. Additionally, the proposed activities would not be moving water or materials from one location to another. Therefore, the proposed project would not contribute to the spread of exotic or invasive aquatic species

Part 2, Q16 - Potentially Affect Unique or Important Aquatic Habitats? NO

Commitments: **NO**

Comments:

Although a number of federally listed aquatic species occur within the Tennessee River below Watts Bar Dam (Aquatics Table 1), suitable habitat for these species does not occur at the project site. Therefore, no impacts to unique or important aquatic habitat would occur

Literature Cited

Tennessee Valley Authority. 2005. General and Standard Conditions Section 26a and Land Use. TVA 17416 [5-2005].

Aquatics Table 1. Records of federal and state-listed aquatic animal species within ten miles of the proposed project at TRM 530 (R) (TVA CEC 25187).¹

Common Name	Scientific Name	Element Rank ²	Federal Status ³	State Status ³	State Rank ⁴
INSECTS					
Cherokee Clubtail	<i>Gomphus consanguis</i>	E		TRKD	S1
FISHES					
Flame Chub	<i>Hemitremia flammea</i>	H		NMGT	S3
Tennessee Dace	<i>Phoxinus tennesseensis</i>	E		NMGT	S3
Tangerine Darter	<i>Percina aurantiaca</i>	E		NMGT	S3
Snail Darter	<i>Percina tanasi</i>	E	THR	THR	S2S3
MUSSELS					
Dromedary Pearlymussel	<i>Dromus dromas</i>	E	END	END	S1
Fanshell	<i>Cyprogenia stegaria</i>	E	END	END	S1
Orangefoot Pimpleback	<i>Plethobasus cooperianus</i>	E	END	END	S1
Pink Mucket	<i>Lampsilis abrupta</i>	E	END	END	S2
Pyramid Pigtoe	<i>Pleurobema rubrum</i>	E		TRKD	S2S3
Rough Pigtoe	<i>Pleurobema plenum</i>	E	END	END	S1
Shiny Pigtoe Pearlymussel	<i>Fusconaia cor</i>	H	END	END	S1
Tennessee Clubshell	<i>Pleurobema oviforme</i>	H		TRKD	S2S3

¹ Source: TVA Natural Heritage Database, queried by C. Phillips on 10/12/2011

² Heritage Element Occurrence Rank; E = extant record ≤25 years old; H = historical record >25 years old

³ Status Codes: END = Endangered; THR = Threatened; NMGT = In Need of Management; TRKD = Tracked by state natural heritage program (no legal status)

⁴ State Ranks: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable

Attachment C. Correspondence with the Tennessee Historical Commission



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

October 18, 2011

Mr. E. Patrick McIntyre, Jr.
Executive Director
Tennessee Historical Commission
2941 Lebanon Road
Nashville, Tennessee 37243-0442

Dear Mr. McIntyre:

TENNESSEE VALLEY AUTHORITY (TVA), WATTS BAR RESORT DEMOLITION, RHEA COUNTY, TENNESSEE

TVA proposes to demolish and remove buildings, a marina, and some associated structures at the former Watts Bar Marina and Resort on TVA property (parcel 300) in Rhea County, TN. TVA identified the area of potential effects (APE) for archaeological resources as the 185-acre parcel occupied by the former marina and resort. The architectural APE was identified as the 185-acre parcel along with all standing buildings and structures within the parcel.

No cultural resources surveys have been conducted previously within the APE and there are no previously recorded archaeological sites in the APE. No historic architectural resources had been identified within the architectural APE prior to the current study.

TVA contracted with TRC Environmental Corporation (TRC) to carry out a Phase I archaeological and architectural survey of the project APE. Enclosed are two copies of the draft report titled *Phase I Cultural Resources Survey of the Watts Bar Resort Property, Rhea County, Tennessee*, along with three CDs containing digital copies.

The archaeological survey conducted Sept. 27-30, 2011 identified one cultural resource, a pile of bricks, within the project APE. TVA finds that the brick pile is ineligible for the National Register of Historic Places (NRHP).

The architectural survey conducted on Sept. 22 and 29, 2011 assessed the former Watts Bar Marina and Resort. The marina and resort was developed during the 1950s with buildings and structures built by TVA in 1939-1940 to house workers during construction of Watts Bar Dam, lock, and powerhouse and Watts Bar Steam Plant ("Watts Bar Village"), along with additional structures and buildings related to its later use as a resort. Buildings and structures assessed by the survey include 38 former family houses, playground equipment, and a service station building (relocated) that were originally part of Watts Bar Village, along with a cafeteria and gift shop building, a marina tackle shop, two swimming pools, a boat dock, and a pair of tennis courts that were built in the 1950s as part of Watts Bar Marina and Resort. TRC recommends that all of the individual structures of Watts Bar Marina and Resort are ineligible for the NRHP

Mr. E. Patrick McIntyre, Jr.
Page 2
October 18, 2011

due to a loss of physical integrity caused by modern alterations, neglect, and vandalism, and in the case of two former Watts Bar Village houses, also due to contamination introduced by their use for illicit methamphetamine production. TRC recommends further that the buildings and structures of Watts Bar Marina and Resort lack sufficient integrity to be listed on the NRHP as a historic district due the demolition of all of the auxiliary buildings formerly associated with the construction of the dam, lock, powerhouse, and steam plant. The demolished features include the water treatment plant, white community building, black community building, dormitories, cafeterias, hospital, personnel building, baseball field and bleachers, and one tennis court. TVA finds that, due to the loss of these features, the former marina and resort no longer retains integrity of design, setting, and feeling as it relates to both Watts Bar Village and Watts Bar Marina and Resort.

Pursuant to 36 CFR Part 800.3(f)(2), TVA is consulting with federally recognized Indian tribes regarding historic properties within the proposed project's APE that may be of religious and cultural significance and are eligible for the NRHP.

TVA has reviewed the enclosed report and agrees with the recommendations of the authors. Pursuant to 36 CFR Part 800.4(d)(1), we are seeking your concurrence with TVA's findings and recommendations that no historic properties would be affected by the proposed undertaking.

Should you have any questions or comments, please contact Richard Yarnell in Knoxville at wryarnel@tva.gov or (865) 632-3463.

Sincerely,



Clinton E. Jones, Senior Manager
Biological and Cultural Compliance
Environmental Permitting and Compliance
WT 11A-K

Enclosures

cc (Enclosures):

Ms. Jennifer Barnett
Tennessee Division of Archaeology
1216 Foster Avenue, Cole Bldg. #3
Nashville, Tennessee 37210



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

November 7, 2011

Mr. Clinton Jones
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902-1499

RE: TVA, CULTURAL RESOURCES ASSESSMENT, WATTS BAR RESORT DEMOLITION,
UNINCORPORATED, RHEA COUNTY, TN

Dear :

At your request, our office has reviewed the above-referenced cultural resources survey report in accordance with regulations codified at 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739). Based on the information provided, we concur that the project area contains no historic properties eligible for listing in the National Register of Historic Places.

If project plans are changed or archaeological remains are discovered during construction, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act.

Your cooperation is appreciated.

Sincerely,

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

EPM/jmb