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Project Number: 2004-8

DRAFT ENVIRONMENTAL ASSESSMENT

WHITE SULPHUR SPRINGS

Pickwick Reservoir
Hardin County, Tennessee

TENNESSEE VALLEY AUTHORITY

JUNE 2004

Direct Comments to:

Helen G. Rucker
NEPA Administration
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DRAFT ENVIRONMENTAL ASSESSMENT

WHITE SULPHUR SPRINGS
PICKWICK RESERVOIR
HARDIN COUNTY, TENNESSEE

TENNESSEE VALLEY AUTHORITY

JUNE 2004

The Proposed Decision and Need

Tennessee Valley Authority (TVA) has received a request from the White Sulphur Springs Homeowners Association to purchase at fair market value the lots they are now leasing from TVA. In 1952, the TVA Board of Directors approved the sale of leased lots to their lessees on various reservoirs in the Tennessee Valley, including the nine cabin sites that are the subject of this request. For various reasons, including the fact that the site was once considered for the location of a steam plant, the sale of these individual cabin sites did not occur. The lessees have requested the opportunity to purchase their individual lots (see Figure 1). The proposed action was discussed in and would be consistent with the Pickwick Reservoir Land Management Plan (Land Plan).

Background

The nine White Sulphur Springs cabin sites identified as Parcel 156 in the Land Plan are intermingled along the shoreline of Parcel 155. The White Sulphur Springs cabin site area was one of TVA's early ventures in cabin site development. The site was established in 1940 as a leased cabin site area containing 23 lots, including one out-lot. During the 1940s, 11 lots were leased to individuals, and summer cabins were constructed on nine of the 11 lots by the lessees.

The nine lots that are leased are not grouped together in one location and range in size from 1.5 acres to 5.5 acres for a total of 21 acres under lease (see Figure 2 and Table 1). The lots that are under lease are: 3, 4, 5, 8, 9, 11, 12, 13, and 19. The nine lots are grouped in four separate areas along the shoreline. In the updated Land Plan, Parcel 156 is allocated to Zone 7, Residential Access, because of the existing land use. TVA has the option to continue the leases, cancel the leases, or sell the lots (3, 4, 5, 8, 9, 11, 12, 13, and 19).

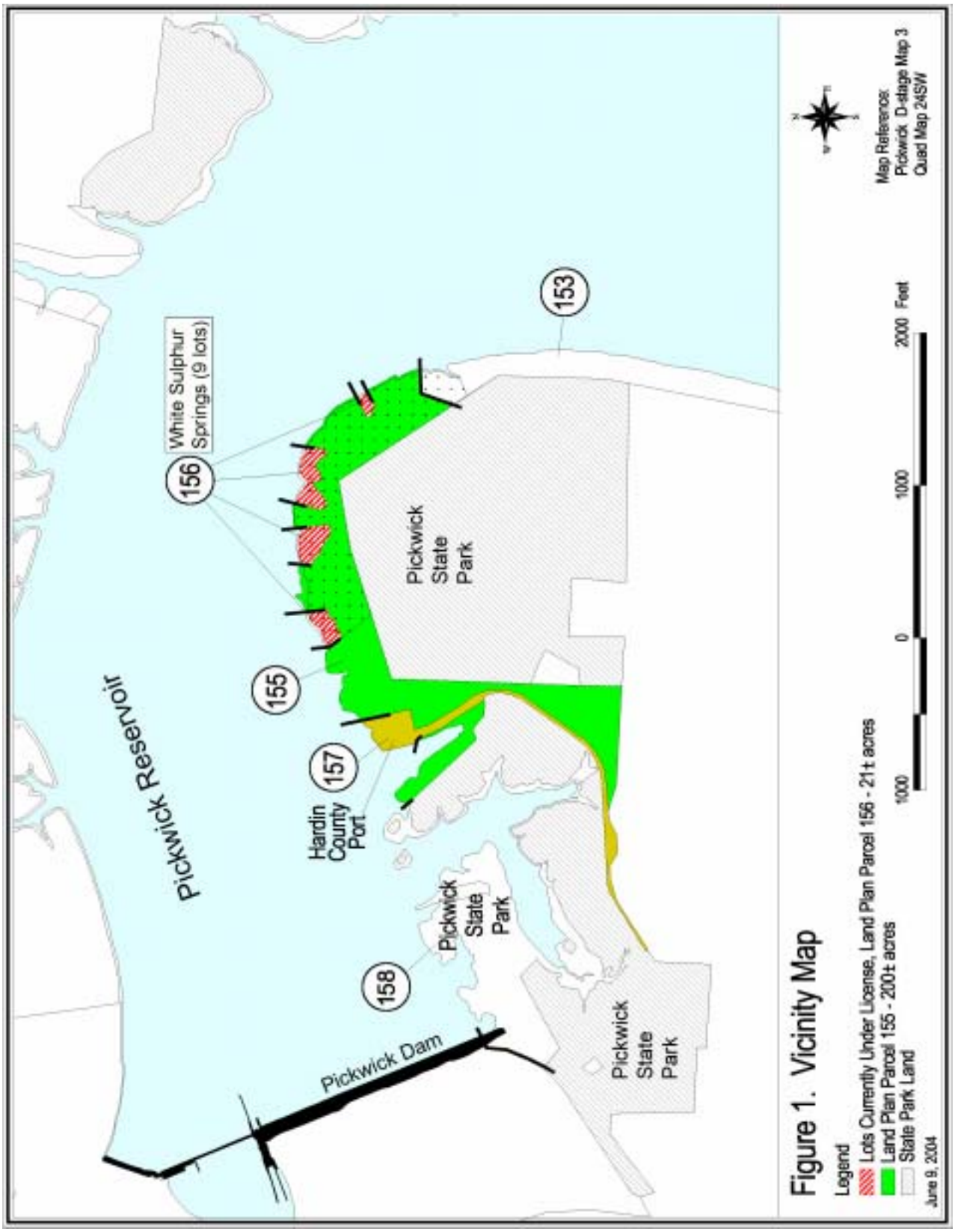

Figure 1. Vicinity Map

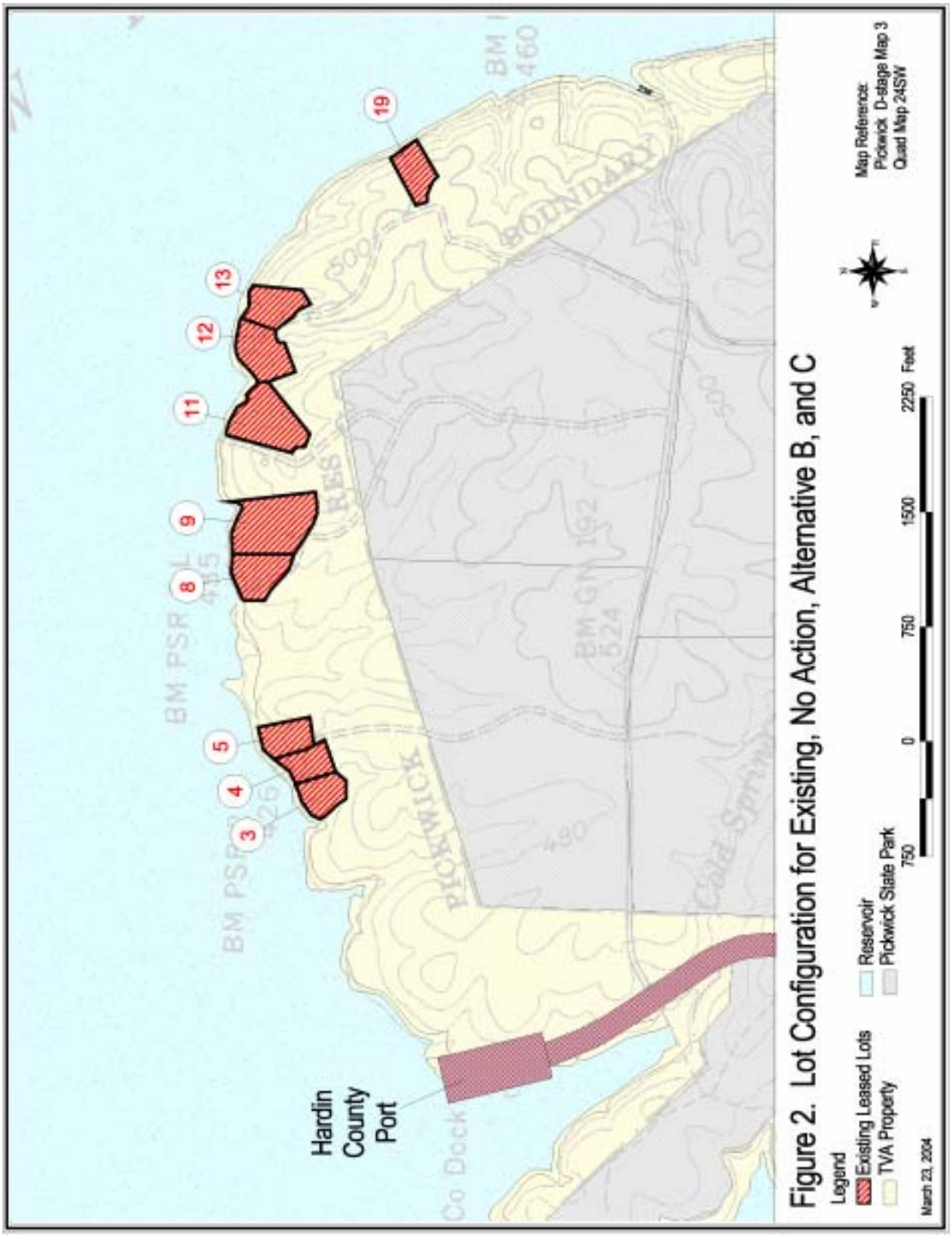

Figure 2. White Sulphur Springs Cabin Sites

Table 1. Existing Individual Lot Dimensions

Lot Number	Approximate Size (Acreage)	Approximate Shoreline (Feet)
3	1.5	306
4	1.5	211
5	1.5	242
8	2.9	317
9	5.5	385
11	4.5	391
12	1.5	475
13	1.5	243
19	1.5	211
Total	**21.9**	**2,781**

Other Environmental Reviews and Documentation

Pickwick Reservoir Land Management Plan Final Environmental Impact Statement, 2002. TVA prepared an Environmental Impact Statement (EIS) for the Pickwick Reservoir Land Management Plan (Land Plan). TVA updated the 1981 Pickwick Reservoir Land Management Plan (1981 Plan) for approximately 19,238 acres of TVA public land on Pickwick Reservoir in Alabama, Mississippi, and Tennessee. The Land Plan allocated land into broad categories, including Project Operations, Sensitive Resource Management, Natural Resource Conservation, Industrial/Commercial Development, Developed Recreation, and Residential Access. During public scoping of the Pickwick Land Plan, 83 percent of the commenters said more natural resource protection was needed, and only 2 percent said more development was needed. Fifty-five percent said less development was needed. The Land Plan resulted in about 63 percent of Pickwick Reservoir land being allocated to Natural Resource Conservation, 7 percent to Sensitive Resource Management, and 6.7 to 6.9 percent to Developed Recreation.

The Land Plan allocated the White Sulphur Springs property (Parcel 156) to Zone 7, Residential Access, and the impacts of this allocation, including the proposal to sell the nine lots, were evaluated for environmental impacts. This Environmental Assessment (EA) will tier from the Pickwick Reservoir Land Management Plan Final EIS.

Shoreline Management Initiative (SMI): An Assessment of Residential Shoreline Development Impacts in the Tennessee Valley (TVA, 1998).

TVA completed an EIS on possible alternatives for managing residential shoreline development throughout the Tennessee River Valley. Under the Blended Alternative that was selected, sensitive natural and cultural resource values of reservoir shorelines will be conserved and retained by preparing a shoreline categorization for individual reservoirs; by voluntary donations of conservation easements over flowage easement or other shore land to protect scenic landscapes; and by adopting a “maintain and gain” public shoreline policy when considering requests for additional residential access rights. The Blended Alternative

recognizes the reality that previous decisions have already opened up 38 percent of TVA's shore land to access, but commits to holding the line at this level and possibly "gaining" back some of the already opened land in a way that would heighten its protection. TVA's commitments to substantially reduce adverse environmental impacts of future residential shoreline uses include promoting conservation easements across shore land to protect scenic landscapes, encouraging clustered development, or providing other public benefits. In the SMI EIS Record of Decision (ROD), the TVA Board modified the Blended Alternative to include a 50-foot Shoreline Management Zone (SMZ). Standards include a 50-foot-deep access/visual corridor and limited vegetation disturbance outside of the SMZ on TVA land. TVA would only permit limited cutting of small trees and selective removal of certain plants like poison ivy and invasive exotic plants such as honeysuckle. The SMI standards would apply to the White Sulphur Springs lot owners. The Pickwick Reservoir Land Management Plan EIS tiered from the Final SMI EIS.

Alternatives and Comparison

TVA currently is considering four options: to continue the leases; cancel the leases; sell the lots (3, 4, 5, 8, 9, 11, 12, 13, and 19) at current lot sizes; or sell the lots at a reduced acreage.

No Action

Under the No Action Alternative, TVA would continue to lease the lots to the cabin owners at an established fair market value.

Alternative B

Under Alternative B, TVA would cancel the leases, which would result in the cabin owners being given a two-year opportunity to lease their lots from TVA at an established fair market value. At the end of two years, TVA would extinguish the lease and the owners would have to remove their private improvements, or TVA would do so and bill the leaseholders to recover its administrative costs.

Alternative C

Under Alternative C, TVA would sell the lots at fair market value to the existing structure owners to whom the lots are currently being leased (see Table 1 and Figure 2) and would also grant the rights necessary to access the site. Nine lots, totaling 21.9 acres with an associated 2,781 feet of shoreline would be sold at fair market value. Those lessees who do not choose to purchase the property would be given a two-year opportunity to lease their lots from TVA at an established fair market value. At the end of two years, TVA would extinguish the leases, and the owners would have to remove their private improvements, or TVA would do so and bill the leaseholders to recover its administrative costs.

Alternative D

Under Alternative D, each cabin owner would have the option to purchase a smaller-sized lot. Each lot would be a minimum of 1 acre to ensure enough acreage is available for septic drain fields. The lakeside boundary of each lot would be the 423-foot contour; each lot would be deep enough to include existing road access; and each lot would be large

enough to encompass the existing structures and access to existing water use facilities. Where possible, adjoining straight-line lot boundaries were identified in order to avoid narrow strips of TVA public land between the individual lots. The lot sizes would be reduced as shown in Table 2 (see Figure 3). Using an independent Member of the Appraisal Institute (MAI) appraiser located near the market area, TVA would offer the current leaseholders an opportunity to purchase the property at fair market value. As under Alternative C, those lessees who do not choose to purchase the property would be given a two-year opportunity to lease their lots from TVA at an established fair market value. At the end of two years, TVA would extinguish the leases and the owners would have to remove their private improvements, or TVA would do so and bill the leaseholders to recover its administrative costs. At this time, the remaining residentially allocated land between the lots would be managed for Natural Resource Conservation. An SMZ applicable to SMI-established criteria would be identified, including vegetation management plans.

Table 2. Proposed Individual Lot Dimensions Under Alternative D

Lot Number	Approximate Size (Acreage)	Approximate Shoreline (Feet)
3	1.3	98
4	1.5	194
5	1.0	200
8	3.0	386
9	2.1	255
11	1.0	200
12	1.0	236
13	1.0	220
19	1.0	147
Total	**12.9**	**1,936**

Comparison of Alternatives

All alternatives would be in alignment with the Pickwick Land Plan and TVA's SMI ROD. Under all the alternatives, since the cabin structures are privately owned, the owners legally can choose to make alterations as desired, including demolition. Potential visual impacts under Alternative B would actually be beneficial, and the No Action Alternative would be indiscernible. Alternative D would have the least potential for visual impacts, followed by Alternative C. Alternative B would have the greatest potential for impacts to the cabin structures, as they would have to be removed.

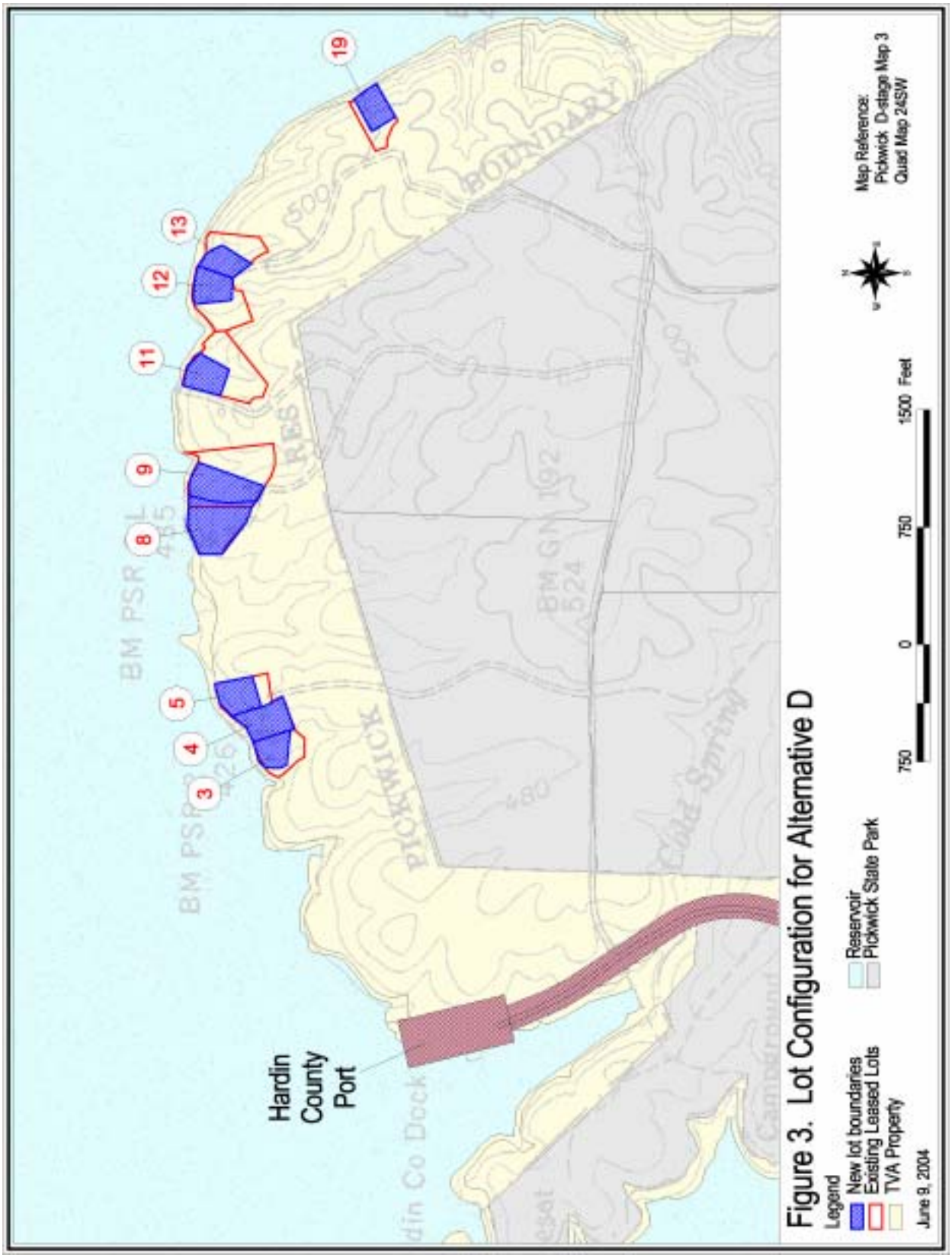

Figure 3. Lot Configuration for Alternative D

Under the No Action Alternative, the lessees would continue to lease the sites at fair market value. TVA's Pickwick Watershed Team would continue to incur labor costs by dealing with ongoing administrative issues about the cabin sites. There would probably be no discernible change to the existing landscape character.

Under Alternative B, TVA would cancel the leases, resulting in the cabin owners having to remove the structures from TVA public land within two years. Some cabin owners would probably elect to demolish the structures rather than moving them to a new location. There would be an enhancement to the existing landscape character as the cabins and water use facilities are removed, and the vegetation would return to a more forested or natural state over time.

Under Alternative C, if the current larger lots were sold at fair market value, more acreage would be under the control of private landowners, which could result in more vegetation removal, possibly affecting the visual integrity of the area. In addition, the cost could be unattractive and in some cases unaffordable to some of the existing cabin owners. For those who elect to purchase their respective lots, they would have greater control over what they can do to the property. They would no longer have the potential of their licenses being revoked and therefore could make long range plans for the use of this property. Necessary maintenance would be done by some, thus preserving the original cabin. Others may choose to update and make additions to their cabins. Others may elect to remove the original cabins completely and build new homes. Alternative C could result in the introduction of potentially adversely contrasting elements, such as larger structures and improved water use facilities, which would be discernible chiefly from the foreground viewing distance.

Under Alternative D, the existing cabin owners would have the option of purchasing a smaller-sized lot, thus making their purchase more affordable and would reduce potential for visual impacts, as the potential for vegetation clearing would be limited to the privately owned land. The total number of TVA acres to be sold would be reduced approximately 41 percent, from 21.9 to 12.84 acres. The amount of residential shoreline would be reduced approximately 31 percent, from 2,781 feet to approximately 1,936 feet. The potential for impacts to the cabin structures and water use facilities would be the same as under Alternative C.

Affected Environment and Evaluation of Impacts

Site Description

This 21-acre parcel is identified as Parcel 156 in the Land Plan and is located on the left bank of lower Pickwick Reservoir (Tennessee River Mile 209.5), just upstream of Pickwick Landing State Park (see Figure 2). This parcel consists of the nine White Sulphur Springs cabin sites, which are intermingled along the shoreline of Parcel 155. These are historically important as a remaining example of a TVA program providing lake cabin lots and as good examples of period resort cabin architecture. The White Sulphur Springs cabins are owned by the individual lessees, who can legally alter the cabins, including demolition.

The cabin area is fairly undisturbed except for the vicinity immediately around each homesite. Some small cleared areas exist on the south side of the parcel, as well as cleared utility corridors for the cabins. Exotic species are found mostly in bottomland areas

and cleared areas. Exotics include privet, moneywort, Nepal grass, and sericea lespedeza. This parcel also contains good habitat for wildlife. The mixture of mature loblolly pines and hardwoods provides a variety of foraging and nesting habitat for many species of wildlife. The parcel is used heavily by Neotropical songbirds as they migrate during spring and fall. During winter months, bald eagles and osprey rest in the larger trees along the shoreline as they search for food.

Impacts Evaluated

During the 1981 Pickwick Reservoir Land Management Plan, potential impacts associated with the allocation of Parcel 155 to Residential Development were assessed. No impacts to protected plant species or wetlands on Parcel 156 are anticipated because none are known or expected to occur on this parcel. No impacts are anticipated on terrestrial and aquatic threatened and endangered species, air quality, recreation, and navigation. No impacts to Pickwick State Park were identified. For aquatic ecology and water quality, requests for the alteration or further development of this parcel would need to include Best Management Practices and maintenance of a 50-foot SMZ to reduce potential impacts, which are the SMI criteria for residential development. The proposed lot sales would not involve property within the limits of the 100-year floodplain of the Tennessee River. Under any of the alternatives, potential development with the floodplain would generally consist of water use facilities and other repetitive actions in the floodplain that should result in minor floodplain impacts. The following language should be included in the deeds of transfer and in subsequent property deeds and agreements for future development on the lots.

- Any future facilities or equipment subject to flood damage are located above or flood proofed to the TVA Flood Risk Profile Elevation (FRP) of 419.0-feet mean sea level. The FRP for each lot shall be that elevation defined by TVA, as established at the time such facilities are under construction.
- All future development is consistent with the requirements of TVA's Flood Control Storage Loss Guideline.
- TVA reserves the right to flood these tracts as needed during flood control operations up to the 419-foot contour.

TVA determined more analysis was needed for the potential impacts to two resource areas, cultural and visual resources. These are discussed in the following sections.

Cultural Resources

On the 21-acre parcel of land, two archaeological sites were identified during a Phase I survey conducted by the University of Alabama, Office of Archaeological Research. Both sites, 40Hr318 and 40 Hr319, were identified as prehistoric based on the presence of flakes associated with stone tool manufacture. The nature of these sites indicates that little information can be extracted, and therefore they are of no historical significance. TVA determined that no National Register of Historic Places (NRHP) listed or eligible archaeological sites would be affected by the proposed undertaking. In a letter dated January 28, 2004, the Tennessee State Historic Preservation Officer (SHPO) concurred with this finding.

The nine cabins were field inspected and evaluated for historic integrity and physical condition, both for their exteriors and interiors. Additional data were collected verifying the

approximate dates of construction and alterations. A few of these cabins exhibited a rustic-cabin architectural style. Others were of more ordinary construction with little architectural distinction. Some may possibly be less than 50 years old; over 50 years old is one of the criteria for determining the eligibility for listing on the NRHP. The cabins were also found to be in various states of deterioration. Under Section 106 of the National Historic Preservation Act, it has been determined that four of the cabins are eligible for listing on the NRHP, and two others are potentially eligible. Because this action could possibly cause an adverse effect on these historic cabins, TVA in consultation with the Tennessee SHPO has agreed to mitigate this adverse effect by preparing a report documenting the White Sulphur Springs cabin group. The Memorandum of Agreement (MOA) stating the conditions of this consultation is attached.

Visual Resources

Visual resources are evaluated based on existing landscape character, distances of available views, sensitivity of viewing points, human perceptions of landscape beauty/sense of place (scenic attractiveness), and the degree of visual unity and wholeness of the natural landscape in the course of human alteration (scenic integrity).

The nine cabin sites are loosely set about a point located at a bend in the river just upstream of Pickwick Landing Dam. Development is visible from nearly every vantage point surrounding the cabin sites in the form of residential communities, formal recreation areas, and TVA project operations.

Prominent vantage points from which to view the cabin sites include: the overlook at Pickwick Landing Dam, residential developments located along the opposing shoreline, developed recreation areas on the opposite shore at Bruton Branch, residential development further upstream to the mouth of Dry Creek, and from various locations on the main body of the reservoir available to recreational and commercial lake users. Views available from these vantage points are generally from within the middleground (0.25 mile to 4 miles from the observer) viewing distance where the existing landscape character is seen in a broad context. The form of the apparently undisturbed tree canopy against the horizontal plane of the reservoir gives contrast to the surrounding development. The form and color of the well-vegetated point draws views from the northern and western shores as the reservoir turns upstream and out of view. The shoreline appears virtually untouched from this distance as bank condition ranges from gently sloping and well vegetated to slightly eroding from wave action. The few water use facilities that are scattered along the point recede from view against the back-lying vegetation as they are uncovered and simple in design and color.

The existing character of the shoreline becomes more apparent when viewed by recreational and commercial lake users who pass within the foreground (up to 0.25 mile from the observer) viewing distance. From the foreground, water use facilities and shoreline conditions become much more noticeable. The uncovered floating docks, many in disrepair, are connected to shoreline areas where erosion in some areas has left exposed soil and undercut banks as much as 5 feet in height. From these points along the shoreline, openings in the dense vegetation are noticeable with the rustic cabins becoming increasingly visible through roughly maintained corridors to the water's edge. The cabins, many of which are set below the ridge line, are visible intermittently through corridors to the reservoir and seen against the remains of mature vegetation. Their position, color, and

partial vegetative screening cause the cabins themselves to remain visually subordinate to the surrounding landscape. Each of the structures is low in height with simple facade and roof pitch, further reducing discernible contrast with the surrounding landscape. Elsewhere on the lower end of the reservoir, the impact of residential construction is more readily visible. Structures are discernible into the middleground viewing distance, as in some developments they are set about the ridge lines that have been cleared of maturing vegetation. In these instances, residential dwellings become focal points and dominate views that would otherwise remain harmonious in form, line, texture, and color. The scenic attractiveness of the subject parcels and their position relative to the White Sulphur Springs point is distinctive due to the strategic location of the cabin sites, and the scenic integrity is moderate to high.

Impacts to visual resources are examined based on changes between the existing landscape and the landscape character after alteration, identifying changes in the landscape character based on commonly held perceptions of landscape beauty and the aesthetic sense of place.

Under the No Action Alternative, TVA would continue the leases, and the landscape character would remain in its current state. The cabin owners could remove their cabins and extinguish their leases.

Under Alternative B, TVA would choose to cancel the leases and allow current leaseholders a period of two years to remove improvements. During the two years prior to lease cancellation, the landscape character would remain in its current state. At the conclusion of the two-year period and as improvements are removed, temporary visual discord would likely be evident from the foreground viewing distance. However, the number and duration of views from this vantage point would generally be very low. After improvements have been removed, the scenic value would increase slightly as existing water use facilities were removed and natural, successive revegetation occurred on the cabin sites.

Under Alternative C, TVA would individually offer the lots for sale in their current configuration to the existing cabin owners (see Table 1). The existing landscape character would potentially be altered by improvements made to the cabins, water use facilities, and vegetation on the lots. Land that is currently managed by TVA would become private property, and individual cabin owners would have the option of removing existing vegetation, subject to the limits of their individual ownership boundaries to the 423-foot elevation contour. This potential action would incrementally impact views currently available from vantage points described previously, proportionate to the distance of reservoir frontage that would be sold. The property owners would have an opportunity to request improvements to water use facilities that would potentially become dominant elements when viewed from the foreground viewing distance, contrasting with the surrounding landscape character rather than remaining visually subordinate to it. If these potentially adversely contrasting water use facilities were improved in deference to the existing landscape character and surrounding environment, leaving water use facilities either uncovered or covered but with no sides, the potentially adverse impacts would be greatly reduced. From the middleground viewing distance, impacts would be similar. Enclosed water use facilities would become visually discordant points of emphasis along the otherwise naturally appearing shoreline segment. The severity of impacts discernible from the middleground distance would be greatly reduced if water use facilities were improved and/or constructed with open sides.

Under Alternative D, the cabin owners would be individually offered the opportunity to purchase their respective lots, but the sizes would be reduced as shown in Table 2 and Figure 3. In this situation, reservoir frontage would be reduced by approximately 30 percent from Alternative C, resulting in a potentially lessened impact to near shoreline vegetation surrounding the existing cabin sites. Potential impacts associated with cabin structures, water use facilities, and vegetation removal would be similar to those described under Alternative C. Should any of the current lessees not be willing to purchase their respective lots, TVA would cancel the leases and allow current leaseholders a period of two years to remove improvements. Impacts would be similar to those described in Alternative B, with variations based on the number of sales and canceled leases, which are at this time indeterminable, but would be less than Alternative C.

Under Alternatives A, C, and D, the cabin owners would have the opportunity to restore, renovate, or replace the existing cabins. The location of the White Sulphur Springs point, in context with surrounding landscape characters and scenic values make it sensitive to disturbance. The impacts that occur on individual parcels have a direct effect on the larger land mass when viewed from the middleground distance as form and line would potentially be visibly disturbed. The larger land mass (Parcel 155) is allocated to Zone 4, Natural Resource Conservation, in the Land Plan. If existing cabin owners remove improvements and rebuild single-family dwellings so that steeply pitched roof lines extend well above the tree canopy, which ranges from approximately 40 feet to 60 feet, the scenic value of Parcel 155 would be permanently and significantly adversely impacted. Avoidance of this potentially significant impact would be ensured by conditioning the sale of these lots so that no structure would be constructed that would extend higher than 50 feet, measured to the highest point on the roof from the lowest existing ground elevation within the planned building perimeter.

Mitigation

Under Section 106 of the National Historic Preservation Act, it has been determined that four of the cabins are eligible for listing on the NRHP, and two others are potentially eligible. Because this action could possibly cause an adverse effect on these historic cabins, TVA in consultation with the Tennessee SHPO has agreed to mitigate this adverse effect by preparing a report documenting the White Sulphur Springs cabin group. The MOA stating the conditions of this consultation is attached.

The average lakefront home being constructed in the area has been determined to be approximately 34 feet in height. It is foreseeable that based on site suitability, design, and construction methods, dwellings could be constructed that would reach heights up to 60 feet. Depending on location in relation to topography and vegetation within the individual lots, this would result in a discordant and adversely contrasting form extending above the existing tree canopy, causing an adverse and potentially significant impact to the scenic value of Parcels 155 and 156. Avoidance of this potential impact would be ensured by adding the following restriction to the land transfer instrument:

> Structures shall be no higher than 50 feet, measured to the highest point on the roof from the lowest existing ground elevation within the planned building perimeter.

Preferred Alternative

TVA's preferred alternative is Alternative D. Under this alternative, each lot owner would have the option of purchasing their lot as originally described in lease agreements or at a reduced acreage amount. Under Alternative D, only 12.84 acres would be sold, and TVA would retain approximately nine more acres than under Alternative C.

TVA Preparers

Spencer D. Boardman, Project Manager

J. Bennett Graham, Senior Archaeologist

Jon C. Riley, Landscape Architect - Visual Specialist

Helen G. Rucker, Senior NEPA Specialist

Charles R. Tichy, Historic Properties Specialist

Attachments

- January 28, 2004 SHPO letter
- MOA pursuant to 36 CFR § 800.4(b)(2) and 800.6(b)(1)(iv)
- Agencies and Others Consulted

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

January 28, 2004

Mr. J. Bennett Graham
Tennessee Valley Authority
Cultural Resources
Post Office Box 1589
Norris, Tennessee 37828-1589

RE: TVA, ARCHAEOLOGICAL ASSESSMENT, PICKWICK/9 CABINS ON TRACT 156, UNINCORPORATED, HARDIN COUNTY, TN

Dear Mr. Graham:

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

Therefore, this office has no objection to the implementation of this project. 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,

/Herbert L. Harper

Herbert L. Harper
Executive Director and
Deputy State Historic
Preservation Officer

HLH/jmb

TVA

TN. HISTORIC
COMMISSIO

Tennessee Valley Authority, Post Office Box 1589, Norris, Tennessee 37828-1589

April 6, 2004

Mr. Herbert Harper
Tennessee Historical Commission
2941 Lebanon Pike
Nashville, Tennessee 37243-0442

Dear Mr. Harper:

TVA – FINAL MEMORANDUM OF AGREEMENT (MOA) – WHITE SULPHUR SPRINGS CABIN LOTS, PICKWICK RESERVOIR

Please find enclosed a copy of the final Memorandum of Agreement for White Sulphur Springs Cabin Lots stating the conditions of this consultation. If you are in agreement, please sign the MOA and return to me. If you have any questions, please call Charles Tichy at (865) 632-1581 or me (865) 632-1583.

Sincerely,

J. Bennett Graham, Manager
And Senior Archaeologist

Enclosure

MEMORANDUM OF AGREEMENT
PURSUANT TO 36 CFR § 800.4(b)(2) and 800.6(b)(1)(iv)

WHEREAS, the Tennessee Valley Authority (TVA) has proposed an undertaking to sell nine (9) cabin lots (Lots 3, 4, 5, 8, 9, 11, 12, 13 and 19) on its lands on Pickwick Reservoir in Hardin County; and

WHEREAS, the TVA has surveyed the cabins on these nine (9) lots; and

WHEREAS, the TVA has determined that the cabins on these nine (9) lots are potentially eligible for listing in the National Register of Historic Places (NRHP); and

WHEREAS, the TVA has determined that this undertaking will have an effect upon the cabins on lots 3, 4, 5, 8, 9, 11, 12, 13 and 19; and the TVA has consulted with the Tennessee State Historic Preservation Office (SHPO) pursuant to 36 CFR Part § 800, regulations implementing Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f); and

WHEREAS, the nine (9) cabins on these lots are privately owned and are on leased TVA lots; and

WHEREAS, a map of the area of potential effect (APE) for the sale of these nine (9) cabin lots is made a part of this document by reference as "Appendix A."

NOW THEREFORE, TVA and the Tennessee SHPO agree that the undertaking shall be implemented in accordance with the following stipulations.

Stipulations

TVA, in consultation with the Tennessee SHPO, will ensure that the following measures (evaluation and documentation of historic properties) are carried out by TVA Cultural Resources staff prior to the commencement of the sale.

1. EVALUATION:
TVA Cultural Resources staff shall, in consultation with the SHPO, evaluate the historic significance of properties identified through the survey in accordance with 36 CFR § 800.4(c). This evaluation shall be conducted in consultation with the SHPO, and a written report of the survey shall be submitted to the SHPO for review and comments.

2. DOCUMENTATION PLAN:
TVA Cultural Resources staff, in consultation with the SHPO, shall ensure that all pertinent information regarding those cabins that have been determined under para. 1 to be eligible for the NRHP is documented consistent with the Secretary of the Interior's Standards and Guidelines, meeting Level III requirements. The documentation will

include the history of ownership of the cabins, and the history of the former community of White Sulphur Springs from which this cabin area derived its name.

3. REPORTS:
TVA Cultural Resources staff shall ensure that all historical investigations undertaken under this agreement are recorded in formal written reports that meet the Secretary of the Interior's Standards and Guidelines. The SHPO shall be afforded thirty (30) days to review and comment on any historical reports submitted as compliance with this agreement.

4. ADMINISTRATIVE CONDITIONS:

a. Should any signatory object within thirty (30) days after receipt to any plans, specifications, contracts, or other documents provided for review pursuant to this agreement, TVA shall consult with the objecting party to resolve the objection.

b. If any signatory to this agreement determines that the terms of the agreement cannot be carried out, the signatories shall consult to seek an amendment to the agreement. If the agreement is not amended, any signatory may terminate the agreement. TVA shall either execute a new agreement with the signatories under 36 CFR § 800.6(c)(1) or request the comments of the Advisory Council pursuant to 36 CFR § 800.7(a). Any Advisory Council comment provided in response to such a request will be taken into account by TVA in accordance with 36 CFR § 800 with reference only to the subject of the dispute; TVA's responsibility to carry out all actions under this agreement that are not the subjects of the dispute will remain unchanged.

Execution and implementation of this Memorandum of Agreement by TVA and the Tennessee SHPO, and implementation of its terms, evidence that TVA has taken into account the effects of the undertaking on historic properties, and TVA has complied with its obligations under section 106 of NHPA.

SIGNATORIES:

TENNESSEE VALLEY AUTHORITY

By: _____ Date: 4.5.04

[Kathryn J. Jackson, Executive Vice President, RSO&E]

THE TENNESSEE STATE HISTORIC PRESERVATION OFFICER

By: Herbert L. Harper Date: 4/12/04

[Herbert L. Harper, Deputy SHPO]

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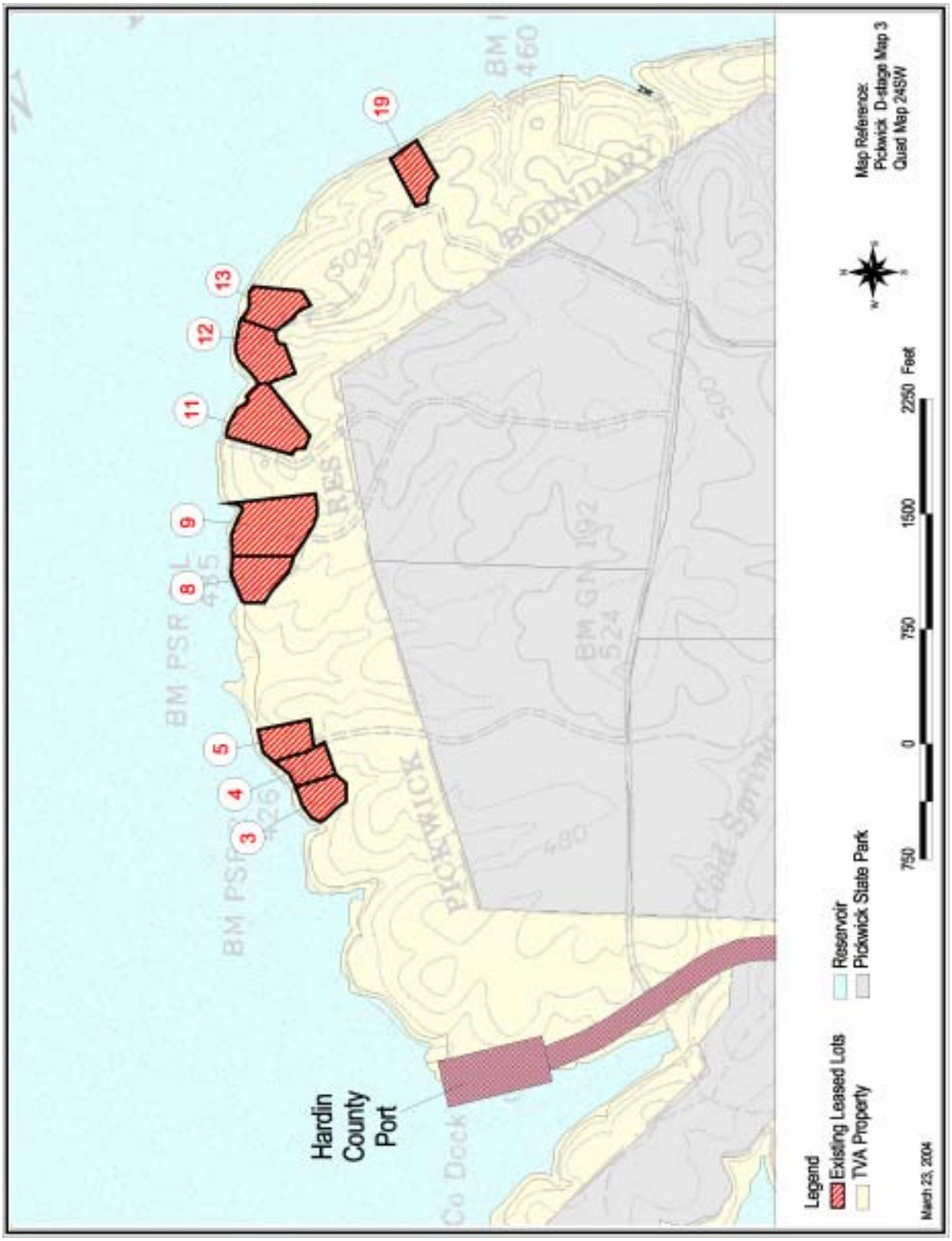
Appendix A



Nine Cabin Lots Proposed for Sale
Area of Potential Effect (APE) consists of the nine (9) proposed cabin lots

Agencies and Others Consulted

A copy of the Draft EA was sent to the following agencies for comment.

Dr. Lee A. Barclay, Field Supervisor
U.S. Fish and Wildlife Service
446 Neal Street
Cookeville, Tennessee 38501

Mr. Louis Buck
Tennessee Department of Agriculture
Ellington Agricultural Center
Post Office Box 40627
Nashville, Tennessee 37204

Mr. Wilton Burnette
Department of Economic and Community Development
320 Sixth Avenue, North, 7th Floor
Nashville, Tennessee 37243-0405

Mr. Herbert L. Harper, Executive Director
Tennessee Historical Commission
2941 Lebanon Road
Nashville, Tennessee 37243-0442

Mr. Dan Sherry
Tennessee Wildlife Resources Agency
Post Office Box 40747
Nashville, Tennessee 37204-0747

Evelyn C. Robertson, Jr.
Southwest Tennessee Development District
27 Conrad Drive, Suite 150
Jackson, Tennessee 38305-2850

Mr. Dodd Galbreath
Department of Environment and Conservation
Environmental Policy Office
L & C Tower, 21st Floor
401 Church Street
Nashville, Tennessee 37243-1530

Pickwick Landing State Park
Jerry Adams, Park Superintendent
Park Road
PO Box 15
Pickwick Dam, TN 38365-0015

Mr. Reggie Reeves
Division of Natural Heritage
8th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243

Ms. Joyce Hoyle
Division of Recreation Services
10th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243

Mr. Paul Davis
Division of Water Pollution Control
7th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243

Lt. Col. Byron G. Jorns
U.S. Army Corps of Engineers
Nashville District
Post Office Box 1070
Nashville, Tennessee 37202-1070

Mr. Ron Gatlin, Chief
Regulatory Branch
U.S. Army Corps of Engineers
3701 Bell Road
Nashville, Tennessee 37214

Mr. Barry Stephens
TDEC NEPA Contact
Division of Air Pollution Control
9th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243

Additionally TVA mailed the following Fact Sheet to the agencies, organizations, and individuals listed below.

PICKWICK RESERVOIR
WHITE SULPHUR SPRINGS CABIN SITE

FACT SHEET

Background

The White Sulphur Springs (WSS) cabin site area was one of TVA's early ventures in recreational cabin site development. The site was established in 1940 where individual lessees would construct private cabins for their personal use (see attached locality map). During the 1940s, summer cabins were constructed on nine lots by lessees. The nine lots are grouped in four separate areas along the shoreline and range in size from one to three acres.

In 1952, a proposed sale to the individual cabin owners was approved by the TVA Board of Directors but was never completed because the site was under study as a potential power plant site. Although the site was later removed from consideration for a plant site, no further action was ever taken on the sale.

In the updated 2002 Pickwick Reservoir Land Management Plan (Land Plan), the WSS cabin site area was designated as Parcel 156 and allocated to Zone 7, Residential Access, because of the existing leases and the development of the nine lots. According to the Land Plan, TVA has the option to continue the leases, cancel the leases, or sell the lots to the individuals who own private cabins on this TVA property.

The Proposed Action and Need

The White Sulphur Springs Association (the current individual cabin owners) has requested that TVA allow them to purchase the lots they are now leasing.

TVA is considering this proposal which will end its land leasing business at the White Sulphur Springs Cabin Site location. This proposed action is compatible with the Land Plan.

Why is the Public Involved?

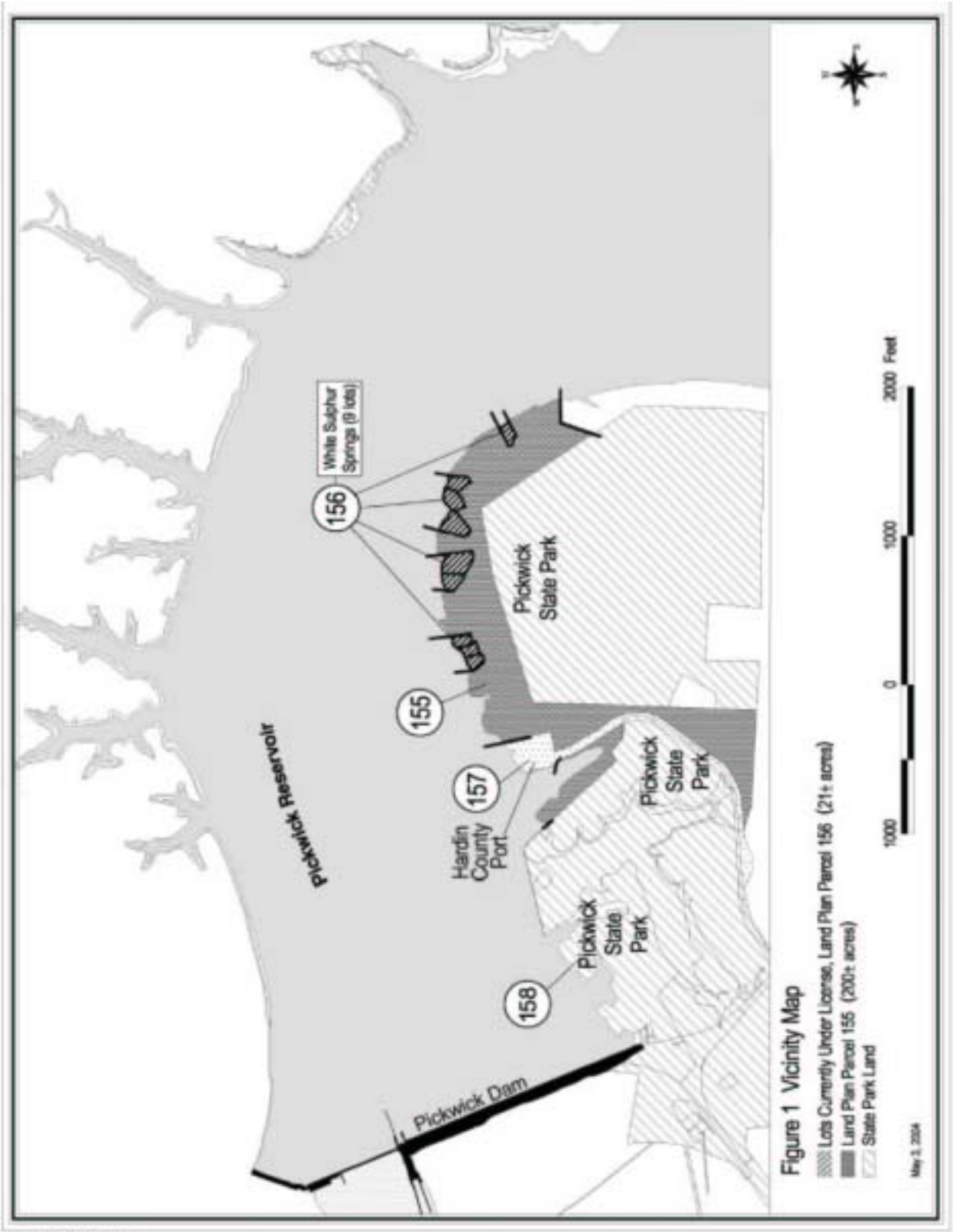
As part of the environmental review process for this action, TVA is inviting the public to provide comments on the proposed action. TVA will use these public comments to complete an environmental review for the proposal. TVA will receive comments for a period of 30 days.

The Draft Environmental Assessment should be available for review in June 2004 at local libraries and will also be posted on TVA's Web site at www.tva.com/environment/reports/index.htm#assess.

If you have questions about the project, please call Spencer Boardman at (865) 632-3034.

If you have concerns about the environmental review process, contact:

Helen Rucker
Tennessee Valley Authority
400 W. Summit Hill Drive
WT 8C
Knoxville, TN 37902-1499
Email: hgrucker@tva.gov



Locality Map

Federal Agencies
National Park Service, Mr. Irv V. Brock, Cherokee, Alabama

State Agencies
Alabama Department of Environmental Management, Norm Blakely, Montgomery, Alabama
Alabama Department of Economic and Community Affairs, Mr. J. Micheal Broadfoot, Montgomery, Alabama
Alabama Department of Conservation and Natural Resources
Mr. Doug Darr, Athens, Alabama
Mr. Riley Boykin Smith, Commissioner, Montgomery, Alabama
Mr. Dudley White, Alabama Game and Fish Division, Montgomery, Alabama
State of Alabama, Wildlife, Mr. Daniel Toole, Florence, Alabama
Alabama Forestry Commission, Mr. Mike Banzhoff, Scottsboro, Alabama
Wildlife and Freshwater Fisheries, Mr. Chuck Sharp, Guin, Alabama

Elected Officials
The U.S. Senate
The Honorable Marsha Blackburn, Memphis, Tennessee
The Honorable Jeff Sessions, Huntsville, Alabama
The Honorable Richard Shelby, Huntsville, Alabama
The U.S. House of Representatives
The Honorable Bud Cramer, Jr., Muscle Shoals, Alabama
State of Mississippi House of Representatives, The Honorable Roger Wicker, Tupelo, Mississippi
State of Tennessee House of Representatives, The Honorable Randy Rinks, Nashville, Tennessee
State of Tennessee, Lt. Governor John Wilder, Nashville, Tennessee

Local Governments
NW Alabama Council of Local Government, Mr. James Keith Jones, Executive Director, Muscle Shoals, Alabama
NW Alabama Council of Local Government, Mr. Sam Minor, Executive Director, Muscle Shoals, Alabama
City of Florence
The Office of Mayor, The Honorable William D. Jordan, Florence, Alabama
Florence Planning Department, Mr. Barry Broach, Florence, Alabama
Florence Chamber of Commerce, Ms. Pat Burney, Florence, Alabama
Florence City Council, Mr. William M. Coussons, Florence, Alabama
Florence Park and Recreation Department, Ms. Regina Greshan, Florence, Alabama
Florence City Council, Mr. Thomas Pirkle, Florence, Alabama
Florence City Council, Ms. Jo Ann Thomas, Florence, Alabama
City of Muscle Shoals
Office of the Mayor, The Honorable David Bradford, Muscle Shoals, Alabama
Muscle Shoals City Council, Mr. H. Allen Noles, Muscle Shoals, Alabama
City of Savannah, Mr. Chris Jerrolds, Vice Mayor, Savannah, Tennessee
City of Sheffield, Office of the Mayor, The Honorable Ian T. Sanford, Sheffield, Alabama
Colbert County Commission

Mr Troy Woodis, Commissioner, Muscle Shoals, Alabama
Mr. Rex Burleson, Muscle Shoals, Alabama
Mr. Howard Keeton, Cherokee, Alabama
Hardin County Mayor, Mr. Kevin Davis, Savannah, Tennessee
Lauderdale County Commission, The Honorable Dewey D. Mitchell, Florence, Alabama
Tishomingo County Board of Supervisors, Iuka, Mississippi
Franklin County Chamber of Commerce, Mr. David Everett, Executive Director, Russellville, Alabama
Shoals Chamber of Commerce, Ms. Cassie J. Asbell and Mr. Lawrence Cross, Florence, Alabama
Florence-Lauderdale County Port Authority, Mr. James R. Loew, Florence, Alabama
Shoals Economic Development Authority, Mr. James A McCarty, Muscle Shoals, Alabama
Shoals Industrial Development Authority, Mr. Forest Wright, Executive Director, Florence, Alabama

Organizations
The Alabama Conservancy,
Ms. Hester Cope, Florence, Alabama
Mr. Hollis Fenn, Florence, Alabama
Mr. Rowland E. Burns, Huntsville, Alabama
Alabama Environmental Council, Mr. Pat Byington, Birmingham, Alabama
Alabama Waterfowl Association, Mr. Mitchell D. Adams, Scottsboro, Alabama
Alabama Wildlife Federation, Mr. Roger Ferrell and Mr. Robert Thornton, Decatur, Alabama
Ducks Unlimited, Mr. Vic P. Daily, Decatur, Alabama
Florence Audubon Society, Mr. Paul Kittle, Florence, Alabama
Friends of the River, Mrs. Corinne H. Bradford, Muscle Shoals, Alabama
Holiday Hills Subdivision, Mr. Joseph N. Young, Property Owner's Representative, Counce, Tennessee
Pickwick Boaters Association, Dr. William B. Burrow, Germantown, Tennessee
Sierra Club, Alabama, Dr. Wayne F. Canis, Florence, Alabama
Tennessee Conservation League, Mr. Michael Butler, Nashville, Tennessee
University of North Alabama, Mr. Thomas M. Haggerty, Florence, Alabama

Businesses
Central Electric Contractors, Inc.,Memphis, Tennessee
McCowat-Mercer Packaging, Inc., Jackson, Tennessee
Mill Creek Marina, Mr. Frankie Murphy, Iuka, Mississippi
National Bank of Commerce, Mr. Bruce E. Campbell, Chairman, Memphis, Tennessee
Packaging Corporation of America, Mr. Richard M. Holland, Counce, Tennessee
Pickwick Land Company, Mr. Jack Pickard, Counce Tennessee
Sheffield Utilities, Mary Yarbrough, Sheffield, Alabama
Sportsmen Boat Storage, Scotty and Brenda Edge. Counce, Tennessee
Tennessee Valley Electric Coop, Mr. Charles W. Bevis, Savannah, Tennessee
Tri State Commerce Park, Bill Burnette, Manager, Iuka, Mississippi
Yellow Creek Port, Mr. A. Eugene Bishop, Iuka, Mississippi
William C. Ellis and Sons Iron Works, Inc., Memphis, Tennessee

Individuals
Mrs. Mary Ackerman, Memphis, Tennessee

Trey and Laura Albright, Corinth, Mississippi
Mr. Huey Paul Alexander, Savannah, Tennessee
Dr. James L. Alston, Memphis, Tennessee
H.A. Anderson, Florence, Alabama
Mr. F. G. Austin, Savannah, Tennessee
Tim and Amy Bailey, Memphis, Tennessee
Mrs. Charliene M. Baird, Pickwick Dam, Tennessee
Mr. Steve Ballard, Counce, Tennessee
Mr. Jeff Barclay, Memphis, Tennessee
Ms. Karen Barnett, Pickwick Dam, Tennessee
Billy and Janice Austin, Bartlett, Tennessee
Walter B. Bearden, Collierville, Tennessee
Mr. Ferrell Benjamin, South Haven, Mississippi
Ms. Bonnie Blair, Germantown, Tennessee
Mr. Alvie Blakney, Burnsville, Mississippi
Mr. David P. Blazer, Muscle Shoals, Alabama
Guy and Bettie Brandon, Pickwick Dam, Tennessee
Ms. Ann Bishop, Iuka, Mississippi
Mr. Donnie F. Bretherick, Sheffield, Alabama
Mr. Charles J. Brewer, Jackson, Tennessee
Kert Bronson, Memphis, Tennessee
Mr. Charlie Brown, Lucedale, Mississippi
Mr. Leland A. Brown, Birmingham, Alabama
Lee Brown, Birmingham, Alabama
Mr. Clark Buchner, Memphis, Tennessee
Mr. Huie E. Burcham, Counce, Tennessee
Mr. Paul Butalla, Killen, Alabama
Mr. E. L. Byrd, Killen, Alabama
Mr. Emmett Caples, Counce, Tennessee
Mr. Brian Cannon, Collinwood, Tennessee
Mr. Ken Carmack, Germantown, Tennessee
Mr. James Don Caudle, Alamo, Tennessee
Mr. and Mrs. Jeff Cerrito, Memphis, Tennessee
Mr. Joseph W. Chance, Cordova, Tennessee
Mr. James L. Clausel, Savannah, Tennessee
Mr. George K. Clayton, Iuka, Mississippi
Mr. Jon D. Clayton, Memphis, Tennessee
Mr. David Cliff, Savannah, Tennessee
Mr. M. Anderson Cobb, Jr., Memphis, Tennessee
Mr. and Mrs. Travis Cogburn, Jr., Bartlett, Tennessee
Mr. Larry Coleman, Memphis, Tennessee
Martha Coleman, Pickwick Dam, Tennessee
Larry and Lela Collum, Cherokee, Alabama
Mr. Scott Cornelius, Florence, Alabama
Mr. William S. Crawford, Collierville, Tennessee
Mr. Bobby A. Cromwell, Savannah, Tennessee
C. Howard and Mary O. Davis, Memphis, Tennessee
Bill and Lou Davis, Memphis, Tennessee
Ms. Debbie Davis, Iuka, Mississippi
Mr. and Mrs. Hull Davis, Corinth, Mississippi

Randolph DuPont, Memphis, Tennessee
Mr. Jimmy T. Dees, Iuka, Mississippi
William and Debra Delk, Olive Branch, Mississippi
Mr. Walt Drissel, Cordova, Tennessee
Mr. F. P. Dugan, Memphis, Tennessee
Ms. Gwen Y. Eanes, Saltillo, Tennessee
Mrs. Rebecca D. Easley, Savannah, Tennessee
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Henry and Lynn Ellis, Memphis, Tennessee
David Everson, Jackson, Tennessee
Robertson and Nelsie Eppes, Memphis, Tennessee
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Mr. Jim Ethridge, Cordova, Tennessee
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Mr. Jerry Hart, Memphis, Tennessee
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Mr. Warner Hodges, Germantown, Tennessee
Mr. Richard S. Hollis, Memphis, Tennessee
Mr. Richard E. Holst, Muscle Shoals, Alabama
Delores Howard, Elkmont, Tennessee
Mr. Harbin Hughes, Savannah, Tennessee
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Mr. Jerry Irons, Michie, Tennessee
Mr and Mrs. A.B. Isbell, Counce, Tennessee
Alfred and Jean Isom, Memphis, Tennessee
A.A. Ison, Memphis, Tennessee
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Mr. Buddy Jobe, Pickwick Dam, Tennessee
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Jim A. Johnson, Counce, Tennessee
Jim and Beth Johnson, Counce, Tennessee
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Mr. Elton Johnson, Savannah, Tennessee
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Mr. Robert K. Ligon, Memphis, Tennessee
Mr. Tom Lilly, Savannah, Tennesee
Mr. and Mrs. C. Eddie Lomenick Jr., Belden, Mississippi
Grady and Helen Lowery, Collierville, Tennessee
Mr. Greg Lowery, Collierville, Tennessee
William and Doris Jibeault, Savannah, Tennessee
Mr. Larry D. Malone, Eads, Tennessee
Mr. Vincent L. Markscuilo, Cordova, Tennessee
Mr. Robert E. Marshall, Iuka, Mississippi
Mr. William E. Mashburn, Arlington, Tennessee
Mr. Charles D. Massengale, Florence, Alabama
Flinn and Gwen H. Maxwell, Memphis, Tennessee
Ms. Margaret M. McCloy, Florence, Alabama
Ms. Karla J. McGee, Sheffield, Alabama
Mr. Duncan McInnis, Jackson, Tennessee
Mr. Bill McKinnie, Pickwick Dam, Tennessee
Bill M. McLemore, Memphis, Tennessee
Mr. Gerald R. McLemore, Corinth, Mississippi
Mr. Bud McNeal, Savannah, Tennessee
Dr. M.E. McQuenn, Corinth, Mississippi
Mr. Mike McWilliams, Cherokee, Alabama
Mrs. Margaret F. Miller, Memphis, Tennessee
Mrs. Virginia Klyce Minervini, Memphis, Tennessee
Ray Montgomery, Florence, Alabama
Mr Gary L. Morris, Iuka, Mississippi
Samuel and Jean Moss, Memphis, Tennessee
Mr. James P. Murphy, Pickwick Dam, Tennessee
Mr. Gerald C. Oliver, Cherokee, Alabama
Blair Outlan. Collierville, Tennessee
Dr. John Outlan, Collierville, Tennessee
Mr. John B. Outlan, Memphis, Tennessee

Marvin H. Palmer, Memphis, Tennessee
Ms. Anne Ward Palmer, Memphis, Tennessee
Mr. Jack Paratore, Memphis, Tennessee
Mr. William J. Parkhurst, Sheffield, Alabama
Mr. J. Gilbert Parrish, Jr., Memphis, Tennessee
Mr. Glenn H. Pate, Memphis, Tennessee
Mr. Olon R. Patterson, Florence, Alabama
Melvin Payne Jr., Bartlett, Tennessee
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Robert and Louise Perry, Corinth, Mississippi
E. Kay Phillips, Florence, Alabama
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Mr. Charles Rose, Florence, Alabama
Mr. and Mrs. Charles J. Ross, Germantown, Tennessee
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Frank and Patti Sachenbacher, Cordova, Tennessee
Mr. John F. Sharpe, Brownsville, Tennessee
Carrie Nell Shelby, Savannah, Tennessee
Mr. J. M. Shepard, Cordova, Tennessee
Mr. Bob Shutt, Savannah, Tennessee
Mr. Johnny Sims, Cherokee, Alabama
W.S. Small, Counce, Tennessee
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Mr. Larry J. Stanford, Corinth, Mississippi
Pat Stansell, Florence, Alabama
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Mrs. Trice Sumner, Tupelo, Mississippi
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David and Martha Walker, Somerville, Tennessee
Joe and Linda Walkup, Pickwick Dam, Tennessee
Mr. David C. Walton, Sheffield, Alabama
Ms. Deedee Warriner, Tupelo, Mississippi
Dr. Richard Warriner, Tupelo, Mississippi
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Dr. and Mrs. Elbert A. White III, Corinth, Mississippi
Ms. Betsy Whitehurst, Corinth, Mississippi
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David and Billie Anne Williams, Memphis, Tennessee
Fayette and Mary Williams, Tupelo, Mississippi
Dr. John C. Williams, Jackson, Tennessee
James and Frances Williams, Tupelo, Mississippi
Mr. Peter M. Williams, Florence, Alabama
W.T. and Nanette H. Williams, Tupelo, Mississippi
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Dean Wingo, Collierville, Tennessee
Mark Woodruff, Memphis, Tennessee
Mr. Bill Wooten, Florence, Alabama
Paul and Judith Wylie, Jackson, Tennessee

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A copy of the Draft EA was placed in each of the following libraries for public review.

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Florence, Alabama

Sheffield Public Library
Sheffield, Alabama

Muscle Shoals Public Library
Muscle Shoals, Alabama

Helen Keller Library
Tuscumbia, Alabama

Memphis-Shelby County Public Libraries
Arlington Branch
Arlington, Tennessee

Lucius E. and Elsie C. Burch Jr., Branch
Collierville, Tennessee

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Lee County
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Corinth Public Library
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Iuka Public Library
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Memphis, Tennessee

Cordova Branch
Cordova, Tennessee

Cherokee Branch
Cherokee, Tennessee

Highland Branch
Memphis, Tennessee

Central Branch
Memphis, Tennessee

Whitehaven Branch
Memphis, Tennessee

Popular-White Station
Memphis, Tennessee

Raleigh Branch
Memphis, Tennessee

Bartlett Branch
Bartlett, Tennessee

Germantown Community Branch
Germantown, Tennessee

Jackson-Madison County Library
Jackson, Tennessee

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Memphis, Tennessee

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Memphis, Tennessee

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Parkway Village Branch
Memphis, Tennessee

Randolph Branch
Memphis, Tennessee

East Shelby Branch
Memphis, Tennessee

Cornelia Crenshaw Branch
Memphis, Tennessee

Frayser Branch
Memphis, Tennessee