Scoping Report

Watts Bar Reservoir
Land Management Plan Amendment
and
Supplemental Environmental Assessment

February 2018

Tennessee Valley Authority
Knoxville, Tennessee
Contact:
Kelly R. Baxter
Senior Specialist, Land Planning
Natural Resources
Tennessee Valley Authority
400 W. Summit Hill Drive, WT 11D-K
Knoxville, Tennessee 37902
Phone: 865-632-2444
Email: kr Baxter@tva.gov
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Introduction

The Tennessee Valley Authority (TVA) proposes to amend the 2009 Watts Bar Reservoir Land Management Plan (RLMP) to respond to new issues and changes in conditions and circumstances while identifying and evaluating the most suitable use of public land under TVA stewardship. TVA proposes to change the land use allocations on six parcels affecting approximately 226 acres of the 13,425 acres (0.02 percent) of Watts Bar reservoir lands in Rhea and Roane counties in east Tennessee.

The six allocation changes are proposed in response to the following:

- Changes in private property ownership on adjacent private property (Parcels 153 and 197),
- Changes in shoreline access rights on adjacent private property (Parcels 89 and 256), and
- Proposed changes in land uses on adjacent TVA reservoir property (Parcels 144 and 271).

The land use allocations on other Watts Bar parcels would remain as allocated in the 2009 Watts Bar RLMP and it supplements.

The proposed RLMP amendment would be consistent with the TVA Land Policy, Natural Resource Plan (NRP) and Comprehensive Valleywide Land Plan (CVLP), Section 26a Regulations, Shoreline Management Policy (SMP) and TVA’s goals for managing natural resources on public lands. RLMPs guide land use approvals, private water use facility permitting, and resource management decisions on TVA-managed public land.

On October 19, 2017, TVA issued a Public Scoping Notice (Notice) to conduct the environmental review for the proposed Watts Bar RLMP Amendment in accordance with the National Environmental Policy Act (NEPA) and published information about the proposed allocation changes on the TVA Web page http://www.tva.gov/wattsbarlandplanreview (see Appendix A for the Notice). TVA also notified numerous individuals, organizations, and intergovernmental partners of the review. The Notice initiated a 30-day public scoping period, which concluded on November 22, 2017. As stated in the Notice, TVA determined that a Supplemental Environmental Assessment (EA) for the six proposed allocation changes would be completed. The EA will supplement the 2009 Environmental Impact Statement prepared for the 2009 Watts Bar RLMP.

This Scoping Report describes the internal and public scoping for relevant issues relating to this land planning effort and the outreach conducted by TVA to notify the public. The Scoping Report also documents the input submitted to TVA by the public and intergovernmental entities during the public scoping period.

TVA’s Objectives

In November 2006, the TVA Board of Directors (Board) approved the TVA Land Policy to govern the retention, disposal, and planning of interests in real property. This policy provides for the continued development of RLMPs for reservoir properties with public input and with approval of the Board or its designee. Up-to-date RLMPs are needed to make land planning allocations on reservoirs consistent with TVA policies (Land Policy and SMP), regulations (Section 26a),
plans (NRP and CVLP), and other guidance to incorporate TVA’s goals for managing natural resources on TVA public lands.

The purpose of TVA’s RLMP planning process is to apply a systematic method of evaluating and identifying the most suitable uses of TVA public lands in furtherance of TVA’s responsibilities under the TVA Act. The planning process uses resource data, staff expertise, stakeholder input, and suitability and capability analyses. The RLMP planning process also supports compliance with applicable state and federal regulations and executive orders, and helps ensure the protection of important resources, including threatened and endangered species, cultural resources, wetlands, unique habitats, natural areas, water quality, and the visual character of the reservoirs.

TVA’s natural resources management strategy promotes the implementation of sustainable, cost-effective practices to balance protection and enhancement of ecological and cultural resources with providing multiple uses of the public lands. Resource management is based on cooperation, communication, coordination, and consideration of stakeholders potentially affected by resource management. TVA recognizes that the management or use of one resource affects the management or use of others; therefore, an integrated approach through the planning process is more effective than considering resources individually. Through this approach, TVA ensures that resource stewardship issues and stakeholder interests are considered and conflicts are minimized.

**Background**

TVA has been charged by Congress with improving navigation, providing flood control of the Tennessee River, providing for the proper use of marginal lands, and other purposes. Congress also tasked TVA with land and shoreline management responsibilities, including acquisition of reservoir areas and protection of watersheds.

Shortly after its creation in 1933, TVA began a dam and reservoir construction program that required the purchase of approximately 1.3 million acres of land for the creation of 46 reservoirs within the Tennessee Valley region. Most of these lands are located underneath the water of the reservoir system or have since been sold by TVA or transferred to other state or federal agencies. TVA currently has custody and control of approximately 293,000 acres of federally-owned reservoir property on behalf of the United States of America (TVA public land). TVA manages these public lands to protect the integrated operation of the TVA reservoir and power systems, to provide for appropriate public use and enjoyment of the reservoir system, and to provide for continuing economic growth in the Tennessee Valley. In order to systematically manage these reservoir lands, TVA develops land use plans to integrate land and water program goals, provide for optimum public benefit, and balance competing and sometimes conflicting resource uses. In managing public lands and resources under its authority, TVA also seeks to provide effective and efficient management of natural, cultural, visual and recreation resources to meet all regulatory requirements and applicable guidelines.

TVA develops RLMPs using a Single Use Parcel Allocation methodology, which defines separate parcels of reservoir land and allocates those parcels and affiliated land rights to one of the following land use zones:
TVA Land Planning Zones

Zone 1 - Non-TVA Shoreland¹
Zone 2 - Project Operations
Zone 3 - Sensitive Resource Management
Zone 4 - Natural Resource Conservation
Zone 5 - Industrial
Zone 6 - Developed Recreation
Zone 7 - Shoreline Access

Land planning zone definitions of the allowable land uses within each TVA land planning zone are described here. The RLMP planning process incorporates the assessment of the environmental impacts associated with land use allocations and provides for public involvement in the decision-making process.

In February 2009, TVA issued the Watts Bar RLMP (2009 RLMP) and Environmental Impact Statement (EIS) for managing its 16,220 acres of public lands on the reservoir. The 2009 RLMP and EIS were released in February 2009, soon after the December 2008 Kingston ash spill, and impacts to environmental resources and private and public property were still being assessed at that time. After the release of the final RLMP and EIS, TVA determined that additional parcels and acreage were impacted than were described in the final RLMP and EIS. TVA prepared an Errata Sheet to update the RLMP indicating that 184 acres (rather than 134 acres) were impacted by the ash spill, and that nine parcels (rather than six parcels) were excluded from the 2009 RLMP. Because of these changes, the total acreage considered in the 2009 RLMP changed from 16,220 acres to 16,036 acres. These nine parcels were considered “unplanned” and TVA decided that the appropriate future uses of these parcels would be determined during the Kingston recovery planning process. The Board approved the 2009 RLMP on November 19, 2009.

As part of the Kingston recovery process, the Kingston Recovery Project Land Management Plan (2012 Plan) was completed in April 2012 to address eight of the nine parcels excluded from the 2009 RLMP. This land planning effort allocated land use zones to 143.6 acres of the 184.0 acres of reservoir property impacted by the ash spill and the 2012 Plan supplements the 2009 RLMP. A 40.6-acre parcel remains “unplanned” and the 2012 Plan indicates its allocation depends on TVA business needs and would be determined at a later date. The proposed RLMP amendment will address this parcel.

On August 18, 2011, the Board accepted TVA’s NRP and authorized the Chief Executive Officer (CEO) to implement the NRP to guide TVA’s natural resource management in the areas of biological, cultural, and water resources management, recreation management, public engagement, and reservoir lands planning. The NRP removed power plant property from planned reservoir lands, so with the implementation of the NRP, the scope of TVA-managed Watts Bar reservoir land acreage was reduced by about 2,796 acres and changed from approximately 16,220 to 13,425 acres.

¹ Lands around TVA reservoirs that are not owned and managed by TVA are identified as Zone 1 and are excluded from the land use planning process. TVA RLMPs do not address the management of these lands.
As part of the NRP, TVA adopted the CVLP to guide use of the approximately 293,000 acres of TVA public land on 46 reservoirs and the Board approved updates to the CVLP target ranges in August 2017. The CVLP is composed of land use allocation ranges which are targets within which TVA intends to maintain a desired balance of shoreline development, recreational use, sensitive and natural resource management, and other uses. The CVLP and its target ranges enable TVA and the public to consider those allocations across the reservoir system and determine whether too much or too little attention is being given to particular land uses on a system-wide basis. Further, the CVLP specifies that TVA can develop and update RLMPs for a portion of a reservoir, an entire reservoir, or a group of reservoirs. The NRP estimated these changes to TVA policies would likely result in reservoirs being planned on a more regular basis than has occurred in the past, allowing TVA to be more responsive to changing conditions on each reservoir.

At the conclusion of this planning effort, then, TVA will have an amended RLMP for Watts Bar Reservoir.

Environmental Review Process

NEPA requires federal agencies to consider and study the potential environmental consequences of major actions. The NEPA review process is intended to help federal agencies make decisions that are based on an understanding of the action’s impacts and, if necessary, to take actions that protect, restore, and enhance the environment (40 CFR 1500.1(c)). NEPA also requires that federal agencies provide opportunities for public involvement in the decision-making process (for more information, visit www.NEPA.gov).

As noted, TVA intends to prepare an EA to consider the proposed allocation changes on six parcels in the Watts Bar RLMP. During the completion of the EA, the public and other environmental and permitting agencies have opportunities to provide input on the development of the environmental review. After considering input from the scoping period, TVA will develop and publish a draft EA that will be provided to the public and intergovernmental partners for additional comment. After the public review period, TVA will make revisions, if necessary, and publish a final EA. Comments on the draft EA will be addressed by TVA in the final EA. TVA will make final land use decisions after the final EA is published.

During the public scoping period in October and November 2017, TVA estimated that the draft EA would be published in early spring 2018, the final EA would be published in the summer of 2018, and a final decision would also be made in summer 2018.

TVA’s Watts Bar RLMP Amendment and EA Webpage

TVA is utilizing its existing corporate website as the primary platform for public outreach. The project website – www.tva.gov/landplanreview - is intended to serve as the primary hub for distributing information to the public. Visitors can navigate from the project website to other land planning websites for additional information pertaining to the Watts Bar RLMP and its supplements and TVA reservoir land planning. Information available on these websites includes:

- Current and proposed land use allocations for each Watts Bar parcel
- Maps identifying each TVA parcel and the proposed allocation change areas
- Previous, relevant environmental reviews of Watts Bar RLMPs
- Information about TVA’s Comprehensive Valleywide Land Plan
- An overview of TVA’s reservoir land management planning process
• An overview of the NEPA environmental review process
• Contact information for the TVA project leads

During the public scoping period, the project webpage directed the public to submit scoping comments via email or mail to Kelly Baxter, TVA Senior Specialist for Reservoir Land Planning. Public comments are included in Appendix B. It also instructed those interested in the proposed land use plan amendment and TVA’s land planning process to contact Kelly Baxter.

Further, those interested in the NEPA process were directed to contact Matthew Higdon, TVA NEPA Project Manager.

Public Outreach During Scoping Period

As noted, TVA’s public scoping period was initiated in October 2017 and TVA placed newspaper advertisements in papers around the region to provide notice of the planning effort and invite public comments (see Appendix A for copy of the advertisements). Advertisements were placed in the following newspapers: *Daily Post-Athenian* (Meigs County), *Knoxville News Sentinel* (Knoxville Area), *News Herald* (Loudon County), *Rhea Herald News* (Rhea County), and the *Roane County News* (Roane County).

TVA also developed a project mailing list and sent postcards and emails to notify those on the list. The mailing list was derived from prior land planning, stewardship and natural resource planning efforts and included TVA partners and others that have expressed an interest in TVA natural resources and public lands management. About 100 postcards and 75 emails were sent.

Issues Addressed During Scoping Period

In its Notice and on the website, TVA stated that it would be preparing a draft EA to consider resources that may be affected by changes to land use allocations on six parcels. TVA solicited feedback from the public during the scoping period and asked that new issues or information about other concerns also be brought to TVA’s attention. TVA anticipates potential impacts to the following resources will be addressed in the EA:

- land uses
- prime farmland
- recreation
- terrestrial ecology (plants and wildlife)
- aquatic ecology
- threatened and endangered species
- water quality
- wetlands
- floodplains
- air quality
- cultural and historic resources
- managed areas and ecologically significant sites
- aesthetics and visual resources
- noise
- socioeconomic resources

TVA’s allocation of parcels to particular land use zones during the planning process is an administrative process that does not result in direct environmental impacts. However, the types of actions that TVA would allow to occur in each land use zone could eventually have varying environmental impacts to resources when site-specific activities are permitted in the future based on the allocations in the land use plans. The scope of the environmental analysis, then, will be programmatic in nature and will address the general types of environmental impacts
anticipated from changing the types of activities that would be permissible within the TVA land use zones identified above.

**Summary of Public Scoping Feedback**

TVA received questions and comments regarding future management of TVA public lands on Watts Bar Reservoir and will consider the input in developing its draft EA. Three comment letters were submitted, one from a federal resource agency and two from resource organizations; the comment submissions are included as Appendix B.

**Federal Agencies**

The U.S. Fish and Wildlife commented that considerations to land use changes should include an evaluation of potential impacts to federally protected threatened or endangered species and that potential impacts to wetland and cultural resources features on Parcel 144 should be addressed with the appropriate regulatory agency.

**Resource Organizations**

Similarly, the Tennessee Citizens for Wilderness Planning expressed concerns regarding potential impacts to wetlands and cultural resources within Parcel 144 and urged TVA to provide long-term plans for the protection of the wetlands and archaeological resources.

The Tennessee Wildlife Federation commented on TVA’s land planning process, the proposed EA level of review, and each proposed allocation change. Tennessee Wildlife Federation indicated that it would prefer that TVA continue to manage Parcel 89 (Natural Resource Conservation) and Parcel 144 (Sensitive Resource Management) as undeveloped public lands that allow for passive recreational use and that TVA should conduct an environmental impact statement prior to potential development on Parcel 144 to fully evaluate site suitability, impacts, and alternatives. On other parcels, Tennessee Wildlife Federation urged TVA to conduct thorough environmental reviews and provide opportunities for public comment for each location to ensure identification and mitigation of potential impacts. Tennessee Wildlife Federation also requested that TVA demonstrate that the proposed allocation changes would comply with the land use allocation ranges in the CVLP.

**Federal and State Agencies and Officials**

In addition to the newspaper publication and TVA website notifications of the public scoping period, TVA notified federal agencies, local and state government entities, and local and regional organizations including natural resource, land management, conservation, recreation, and watershed entities. The list of intergovernmental entities notified by TVA is provided in Table 1.

**Table 1: Agencies Receiving Notice of TVA’s Scoping Period**

<table>
<thead>
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<th>Federal Agencies</th>
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<tbody>
<tr>
<td>Department of Army, Corps of Engineers</td>
<td>Nashville District, Nashville, Tennessee Regulatory Office, Lenoir City, Tennessee</td>
</tr>
<tr>
<td>Environmental Protection Agency</td>
<td>Atlanta, Georgia</td>
</tr>
<tr>
<td>Fish and Wildlife Service</td>
<td>Cookeville, Tennessee</td>
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<td>Tennessee State Agencies</td>
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<tr>
<td><strong>Department of Agriculture</strong></td>
<td>Nashville, Tennessee</td>
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<tr>
<td><strong>Department of Economic and Community Development</strong></td>
<td>Nashville, Tennessee</td>
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</table>
| **Department of Environment and Conservation** | Bureau of Environment, Nashville, Tennessee  
Bureau of Parks and Conservation, Nashville, Tennessee  
Division of Natural Areas, Nashville, Tennessee  
Greenways and Trails Office, Nashville, Tennessee  
Natural Areas Administrator, Nashville, Tennessee  
Natural Areas Regional Office, Knoxville, Tennessee  
Watershed Management, Nashville, Tennessee |
| **Department of Tourism Development** | Nashville, Tennessee |
| **Department of Transportation** | Nashville, Tennessee |
| **Tennessee Wildlife Resources Agency** | Nashville, Tennessee  
Vonore, Tennessee |

TVA will notify the Tennessee State Historic Preservation Officer and federally-listed tribes when the draft EA is released and invite their participation in consultation under Section 106 of the National Historic Preservation Act.
Appendix A: Public Scoping Notice Newspaper Advertisement

Notice of Public Scoping

Proposed Amendment to the Watts Bar Reservoir
Land Management Plan

TVA intends to prepare an environmental assessment (EA) addressing the potential impacts of proposed changes to the land use allocations on six parcels of public land on Watts Bar Reservoir in east Tennessee. The land use allocations on the remaining parcels would remain as allocated in the 2009 Watts Bar Reservoir Land Management Plan and the supplemental 2012 Kingston Recovery Land Management Plan. For more information about the proposed allocation changes, please visit www.tva.gov/wattsbarlandplanreview.

TVA is interested in receiving input from the public regarding the proposed allocation changes and potential effects on the environment or historic properties, and any other issues associated with the proposed changes. Any comments received, including names and addresses, will become part of the administrative record and will be available for public inspection. All written comments on this proposed action must be received on or before November 22, 2017. Written comments may be mailed to the address below or e-mailed to landplans@tva.gov.

Kelly Baxter
Tennessee Valley Authority
400 W. Summit Hill Drive, WT 11-D
Knoxville, Tennessee 37909
(865) 632-2444
### Appendix B: Comments from Agencies and Organizations

(October 20, 2017 through November 22, 2017)

The unedited comments below were submitted to TVA via email, or by letter.

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<tr>
<th>Name</th>
<th>Title</th>
<th>Organization</th>
<th>Date</th>
<th>Message</th>
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<tbody>
<tr>
<td>Mary E. Jennings</td>
<td>Field Supervisor</td>
<td>U.S. Fish and Wildlife Service</td>
<td>November 7, 2017</td>
<td>Dear Mr. Baxter: U.S. Fish and Wildlife Service personnel have reviewed the Tennessee Valley Authority’s (TVA) notice of public scoping to prepare an Environmental Assessment (EA) regarding the proposed amendment to the Watts Bar Reservoir Land Management Plan in Loudon, Meigs, and Rhea counties, Tennessee. The notice indicates that the proposed land use changes would affect a total of 226 acres of TVA property. The EA would address proposed modifications to the following land parcels: 89, 144, 153, 197, 256, and 271. The following constitutes the comments of the Service regarding the proposed EA. Considerations to land use changes should include an evaluation of potential impacts to federally protected threatened or endangered species. The Service is willing to provide assistance in evaluating these impacts in accordance with the Endangered Species Act of 1973, as amended. Furthermore, the amendment to parcel 144 would change 172.3 acres of property from sensitive resource management to project operations. This parcel is the proposed site of the Clinch River Small Modular Nuclear Reactor (FWS# 2017-l-0473) development. The scoping letter indicates that the site is currently managed to protect wetland and cultural resources. Potential impacts to these features should be addressed with the appropriate regulatory agency. The Service anticipates consultation regarding future infrastructure at this site and any other parcels where development is proposed. Thank you for the opportunity to comment on the proposed action. If you have any questions regarding the information which we have provided, please contact Dustin Boles of my staff. Sincerely, Mary E. Jennings</td>
</tr>
<tr>
<td>Sandra K. Goss</td>
<td>Executive Director</td>
<td>Tennessee Citizens for Wilderness Planning</td>
<td>November 22, 2017</td>
<td>To whom it may concern: I write on behalf of Tennessee Citizens for Wilderness Planning, an Oak Ridge-based not-for-profit environmental advocacy organization, about the plans to change land use allocations for six parcels of public land on Watts Bar Reservoir. TCWP is a partner to TVA at the Whites</td>
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Creek Small Wild Area through annual trail maintenance events. (Next one is scheduled for January 13.) TCWP also partners with TVA on an annual Invasive Plant Removal event at Worthington Cemetery Ecological Study Area on National Public Lands Day. TCWP Board and staff very much appreciate our partnership activities, and benefit from TVA staff expertise and support.

Of the proposed allocations, the particular concern for TCWP is the proposed reallocation of 172.3 acres of Parcel 144 at the Clinch River Site from Zone 3 (Sensitive Resource Management) to Zone 2 (Project Operations). In 2008 TCWP worked closely with TVA to protect these sensitive resources. The affected parcel includes much of the riparian area around the peninsula that makes up the Clinch River Site. This riparian area includes many acres of sensitive wetlands and archaeological resources. These resources on Parcel 144 deserve the avoidance and mitigative measures that TVA would impose. These measures need to be included in the site-specific environmental review. Above all, TVA must do all possible to avoid and minimize their footprint(s) in the riparian zone and to avoid adverse effects on wetlands and cultural resources within Parcel 144.

TCWP urges TVA to provide long-term plans for the protection of the wetlands and archaeological resources. Thank you for the opportunity to comment on this issue.

Sandra K. Goss

Mike Butler
CEO
Tennessee Wilderness Federation
November 30, 2017

TWF General Comments: As we understand it, comments on the six parcels are being requested by TVA as part of a scoping period in preparation for the drafting of an environmental assessment (EA) to amend the Watts Bar Land Management Plan. There are land use allocation requests associated with each of the parcels. According to TVA, this is being viewed as a higher level programmatic review and additional environmental assessments (including site-level assessments in association with shoreline management plan/permit reviews and a potential EIS for Parcel 144) will be conducted on a case by case basis as appropriate. We believe that a mid-term change to an existing NEPA approved land management plan should rise to the level of an environmental impact statement versus just an environmental assessment.

Notably, the public notice on the TVA website states that the agency is drafting an environmental assessment (EA) and is interested in receiving comments regarding the action’s potential to affect the environment or historic properties, and to identify any other issues associated with the proposed allocation changes. At this stage, given the way this is communicated, these appear to be unique to and concerning only the proposed changes to the land use allocations on these six parcels on Watts Bar Reservoir. While it is acknowledged that there have been changes to TVA’s overall land planning strategy, this narrow focus seems to be rather uncharacteristic framing of what is being referred to as scoping for an EA and what appears to be in response to a need for purely administrative changes, rather than a request for comments/input that would really have the ability to influence decisions that seem to have already, to an extent, been made (though it is understood that there is the potential for further environmental review and permitting processes in accordance with Section 26a shoreline
construction permitting as an example, that would be required for certain projects to be completed. It calls into question, at what stage should land deals be done relative to the NEPA process?

In at least three of the six cases, it is our understanding that the actual land transactions have already taken place, creating the need for the requested administrative land allocation changes in the Watts Bar Land Management Plan. In such cases, this "retroactive" request has the potential to inadvertently undermine the integrity of the existing land management plan and potentially reverses things that the public has previously voiced support for, as well as relegate potential land allocations to afterthought status, and exerts pressure to facilitate needed approvals.

Similarly, while it's prudent to plan for potential land allocation needs, doing so years in advance of the scheduled land planning revision process potentially opens the door to unintended consequences. With what appears to be the last update in 2012, we would like to know more about the timeline for regularly scheduled land management plan updates and what, more specifically in the process, warrants and allows for requested changes to be proposed and approved "mid-cycle".

TWF strongly encourages and supports opportunity for public involvement in programmatic NEPA reviews and TVA environmental assessment scoping. While it is acknowledged that there are certain, unforeseen situations such as the Kingston Coal Ash Spill, that may precipitate a need for periodic updates and potential land allocation changes outside of the regular land planning cycle, frequent reviews that are not in accordance with a regular plan update cycle (which we have been told is approximately every 10-15 years), may unnecessarily call into question the integrity of the original plan, classifications, and the decision-making process.

While each amendment/update process should allow for a public comment period (as required under NEPA), more frequent proposed amendments mean that it may be more challenging for the public to track requests for comment and result in missed opportunity, and weakening of public trust.

1) Parcel 89:

TWF Comments - As we understand it, Parcel 89 is part of a maintain and gain agreement and includes shoreline access rights from Parcel 256 (backlot property) being applied to Parcel 89 and that the private landowner would still need to apply for a required Section 26a permit and there would be a site-specific review. The maintain and gain agreement has already legally been completed and this land use allocation change would be an administrative measure that would allow for the water use facility (dock) consideration.

While Parcel 89 is a small property, a change in land allocation from Zone 4 (natural resource) to Zone 7 (shoreline access) would include a respective change in 0.12 acres of shoreline property from Zone 7 to Zone allocation, the size of the land swapped is not comparable. Given that 0.4 acres of land that is proposed for allocation change would fragment the natural resource habitat and passive recreational opportunities, it should remain such in perpetuity and should not be subject to development. These types of changes to land allocations should be considered in accordance with the regular land management plan review cycle (which we have been told is about every 10 to 15 years) and the NEPA permitting process. TVA should not be making piecemeal changes to land allocations that are directed by individual landowners when affecting land that is in the public trust.
2) Parcel 144:

TWF Comments - As we understand it, Parcel 144 is part of the former Clinch River Breeder Reactor (CRBR) site. According to the 2009 Watts Bar Land Management Plan Final EIS, this parcel contains significant, very high quality riparian forests habitats and shoreline fringe wetlands that are used by a diversity of upland and wetland wildlife species, as well as cultural resources. While it is acknowledged that the lands would be subject to additional environmental and cultural review, a proposed change of 172.3 acres from Zone 3 (sensitive resource management) to Zone 2 (project operations), would have varying degrees of impact to wildlife and habitat on a large tract of land, would lessen current passive recreational opportunities, and potentially open cultural resources to impacts. It is also notable that previous TVA proposed land allocation changes acknowledged the need for protective measures that would minimize impacts to aquatic species from ground disturbances. Changing the land allocation would open the property to potential development and these very types of disturbances. It is also our understanding that a potential land use allocation change could potentially result in degradation to the contiguous forest that along with the DOE protected forest it currently provides. Maintaining the current sensitive resource status would also afford continued protection of scenic resources and preservation of this natural area, while maintaining public access for passive recreational use.

Given the significant wetlands, cultural resources and current passive recreational opportunities provided by this tract, it is our strong recommendation that Parcel 144 should remain as it was previously designated as Sensitive Resource Management in perpetuity and should not be subject to development. Given the purpose and scope of the larger project that this land is associated with, TVA should conduct an environment impact statement (EIS) to fully evaluate site suitability, impacts, and alternatives.

3) Parcel 153:

TWF Comments - As we understand it, due to the environmental effects of the 2008 Kingston ash spill, TVA changed the land allocation of Parcel 153 (along with eight other parcels) from Zone 7 (shoreline access) to "unplanned". TVA indicated it would designate an allocation after the ash recovery effort was completed. In 2015, they sold this residential property it acquired after the ash spill back to the public for residential use. All properties have deeded shoreline access rights. The land sale has already been complete and this would be an administrative change of the allocation to update the plan that would change 40.6 acres from unplanned to shoreline access (Zone 7). Parcel 153 fronts this residential property (Gunters Field and Kile Subdivisions) and was originally classified as Zone 7.

What is the status of the bottom/and hardwoods, wetlands, important habitat for nesting herons and osprey, and cultural resources that were previously identified in the 2009 EIS on the property? How will these be impacted by potential / shoreline development? It is our recommendation that if this property is returned to Zone 7shoreline access, that all measures be put in place to assess and mitigate wetlands and species impacts.

4) Parcel 197:
A-5

TWF Comments - As we understand it, Parcel 197 is seven noncontiguous parcels fronting residential property on the main river channel from TRMs 562.2R to 567.1R where Tennessee Wildlife Resources Agency (TWRA) acquired backlying private residential land for public recreation purposes and the agency is proposing to construct public water access facilities including a boat-launching ramp and a fishing pier. It is also our understanding that the TWRA land acquisition has already taken place (this is not open to comment) and what is up for comment is the administrative land use allocation change to allow for public recreation use.

While TWF generally supports land use allocation changes of non-sensitive lands that will have little to no impacts to natural resources and provide increased public access, we are wondering what, if any, potential impacts to other private residents will be given the proposed changes? Given the noncontiguous nature of the seven parcels that have been purchased, the actual proposed uses for each of the seven parcels that would precipitate the need for a change to developed recreation should be clarified before wholesale land allocation changes are authorized.

5) Parcel 256:

TWF Comments - As we understand it, Parcel 256 fronts Lakeside and Paradise Cove subdivisions and is part of the maintain and gain agreement with a property owner who is requesting shoreline access at Parcel 89. According to the exchange agreement, the private residential property behind this .12-acre portion of parcel 256 no longer has shoreline access rights. This means that anyone purchasing this private property where the current landowner has relinquished shoreline access rights (they will not be granted shoreline access rights in the future and would no longer be eligible to put in a dock at this location). No other structures will be considered at this location and the .12-acre portion of parcel 256 that is being changed from zone 7 to zone 4 will still provide opportunities for passive recreation, such as bank fishing. Apparently, the land exchange has already taken place (this is not open to comment) and what is up for comment is the administrative land use allocation change.

According to local residents, this cove is a haven for wildlife, and numerous wood ducks, owls, blue herons, bald eagles and osprey. Converting this from Zone 7 (shoreline access) to Zone 4 (natural resource conservation) would be a more protective measure.

We encourage TVA to accept this change in classification, however, the 0.12-acre amount of land to be reallocated as part of the maintain and gain agreement is not comparable in size to that of Parcel 89, which is 0.4 acres. While a small discrepancy, we recommend that TVA consider allocating additional land as natural resource conservation to appropriately offset the land that will be converted to Zone 7 (Parcel 89).

6) Parcel 271:

TWF Comments - As we understand it, this property is across the road from the Spring City Park (Parcel 270, Zone 6) and the proposed land use allocation is being requested now in anticipation of a potential future need for developed recreation, including overflow parking for vehicles and boat trailers for adjacent public boat-launching ramps (in association with future event-related needs). The land use planning cycle is only done approximately every 10 years.

According to the 2009 EIS, Parcel 271 (the 2.4 acre portion of which is up for a land allocation change to developed recreation) consists of riparian forested habitat on a moderate slope and provides limited wildlife habitat and floodwater storage capacity.
It is unclear as to the impacts of intermittent use of the property for potential parking purposes. We recommend further consideration of the impacts and consideration of this land use change in conjunction with the regular land use planning cycle.

Closing comments:

The Federation reiterates the need for TVA to consider these types of land allocation changes only within the official, regularly scheduled planning cycle/process. Given the timing of these land allocation changes, these types of requests and approvals must be placed at the beginning of these processes, and not acted on after the fact. We request that TVA to demonstrate that these changes will comply with the land use allocation ranges in the Comprehensive Valleywide Land Plan. Regarding any potentially affected floodplains or wetlands, TVA should consider the effect of any proposed land allocations and associated projects that are prompting these requested changes and potential alternatives to eliminate or minimize potential effects. Wherever possible, we urge TVA to conduct the most thorough environmental reviews and provide opportunities for public comment for each location to ensure identification and mitigation of impacts to land, water, habitat and wildlife to the fullest extent.

Sincerely,

Mike Butler