



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

January 30, 2017

Via Electronic Submittal at TVA.gov

Attn: Matthew Higdon, NEPA Project Manager
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11D
Knoxville, TN 37902

Dear Mr. Higdon:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) *Multiple Reservoir Land Management Plans (RLMP)* Draft Environmental Impact Statement (EIS). TVA is proposing to develop new RLMP plans for eight reservoirs, six of which are in Tennessee, which will result in the adoption of a new land use planning and allocation framework for RLMPs. The new framework is expected to bring consistency to the land planning process across the eight reservoirs. The preferred action alternative will apply a systematic method for evaluating and identifying the most suitable uses of TVA public lands in furtherance of TVA's responsibilities under the TVA Act.

Actions considered in detail within the Draft EIS include:

- **Alternative A – No Action Alternative.** Under this action alternative TVA would take no action to align or complete RLMPs for the TVA managed lands of the eight reservoirs identified in the Draft EIS. For the six reservoirs with RLMPs in place, the parcels would continue to be managed in accordance with their existing management plans.
- **Alternative B – Proposed Land Use Alternative.** Alternative B is TVA's preferred action alternative and would result in the implementation of new RLMPs for each of the eight reservoirs included in the Draft EIS, six of which are in Tennessee.¹ As part of updating or developing RLMPs, new zone definitions for land use would be adopted²; land currently committed to a specific use would be allocated to that current use unless there is an overriding need to change the use. Land allocations under Alternative B were primarily proposed to reflect existing conditions and identify suitable uses of land utilizing resource data, stakeholder input, suitability and capability analyses, and TVA staff input, and as such the difference between the two alternatives is minor.³

¹ Affected reservoirs in Tennessee include Chickamauga, Fort Loudoun, Great Falls, Kentucky, Nickajack, and Normandy.

² Land would be allocated into broad categories or "zones" including Zone 2 (Project Operations), Zone 3 (Sensitive Resource Management), Zone 4 (Natural Resource Conservation), Zone 5 (Industrial), Zone 6 (Developed Recreation) and Zone 7 (Shoreline Access). Land use allocations to each of these zones would be determined with consideration of the social, economic, and environmental conditions around the reservoirs.

³ The total number of acres of TVA lands around the six Tennessee reservoirs allocated to Zone 4 is slightly lower under Alternative B; there would be a reduction of 6,076.9 acres in Zone 4 (Natural Resource Conservation). In turn, the amount of land allocated to Zones 2, 3, 5, 6 and 7 (Project Operations, Sensitive Resource Management, Industrial, Developed Recreation and Shoreline Access, respectively) would be slightly higher under Alternative B; an additional 1,235.7 acres would be allocated to Zone 2 (Project Operations), 999.5 acres in

TDEC's **Division of Natural Areas (DNA)** has reviewed the Draft EIS and does not anticipate any impacts to rare, threatened, or endangered plant species from Alternative B – Proposed Land Use Alternative. If there are any land planning changes that may impact Tennessee State Natural Areas please contact the DNA.⁴

TDEC's **Division of Archaeology (DOA)** has reviewed the Draft EIS and acknowledges that TVA provides a detailed plan to ensure that significant archaeological resources will not be impacted by future projects on all lands managed by TVA. DOA has no further comments regarding the proposed action alternatives.

TDEC's **Division of Water Resources (DWR)** has reviewed the Draft EIS and notes that the Draft EIS was written before the Water Infrastructure Improvements for the Nation (WIIN) Act was signed into law in December of 2016, which contains provisions regarding TVA's actions with respect to floating homes on TVA reservoirs.⁵ DWR recommends that page I-11 of the Draft EIS be amended to reflect these provisions.

TDEC's **Tennessee State Parks and Real Property Management (TSP)** has reviewed the Draft EIS and acknowledges that TVA has zoned any TVA owned/TSP managed lands as Developed Recreation. TSP has no further comments regarding the proposed action alternatives.

TDEC also acknowledges that any proposed TVA development or activity on public land will be subject to TVA approval pending the completion of an additional site-specific environmental review to evaluate potential environmental effects of the proposal and looks forward to participating in future site-specific environmental reviews.

TDEC appreciates the opportunity to comment on this Draft EIS. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



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cc: Bill Avant, TDEC, TSP
Tom Moss, TDEC, DWR
Mark Norton, TDEC, DOA
Stephanie Williams, TDEC, DNA

Zone 3 (Sensitive Resource Management), 903 acres in Zone 5 (Industrial), 1,925.9 acres in Zone 6 (Developed Recreation), and 1,081.9 acres in Zone 7 (Shoreline Access).

⁴ Contact David Withers, Zoologist, Natural Heritage Inventory Program at (615)532-0441 or david.withers@tn.gov. For more information visit <http://www.tennessee.gov/environment/section/na-natural-areas>

⁵ The WIIN Act prevents TVA from requiring the removal of floating houses, including previously permitted nonnavigable houseboats, from the TVA reservoir system by May 5, 2046.