January 11, 2022

Via Electronic Mail to landplans@tva.gov
Matthew Higdon
NEPA Specialist
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Dear Mr. Higdon:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) Tellico Reservoir Land Management Plan Draft Environmental Assessment (Draft EA), which evaluates the potential environmental impacts of TVA’s proposed revisions to the 2000 Tellico Reservoir Land Management Plan (RLMP) based on its review of all existing land allocations to assess and respond to new issues and changes in conditions and circumstances. TVA proposes to revise the RLMP by changing the allocation of approximately 2,075.0 acres of the 12,787.6 acres (16.2%) of public lands managed by TVA on Tellico Reservoir in Blount, Loudon, and Monroe counties in East Tennessee. The Draft EA evaluated three alternatives in detail, which include the following:

1. **Alternative A – No Action Alternative:** Under the No Action Alternative, TVA would not take any action to amend the 2000 Tellico RLMP for TVA managed lands on the Tellico Reservoir. All parcels would continue to be managed by TVA according to the allocations of the 2000 RLMP. The analysis of this alternative serves as a baseline for comparing the other action alternatives.

2. **Alternative B – Proposed RLMP Alternative:** Under Alternative B, TVA would amend the 2000 Tellico RLMP by reallocating land use zones on 102 parcels affecting approximately 2,075.0 acres (16.2%) of the 12,787.6 acres of TVA-managed public lands on Tellico Reservoir. Under Alternative B, the proposed lands plan would be updated to become consistent with current lands planning practices and would consider proposals previously provided to TVA and supported by TRDA and/or local stakeholders. Consistent with TVA RLMP planning methodology, the public lands managed by TVA on Tellico Reservoir would be reviewed by the planning team and placed into one of the seven land use zones consistent with existing land use and staff recommendations.

3. **Alternative C – Modified Proposed RLMP Alternative:** Alternative C would be substantially the same as Alternative B except that fewer parcels would be identified for potential new development under Alternative B. Alternative C would be substantially similar to Alternative B except that TVA would not revise the allocations of parcels 2, 3, and 74 and a portion of parcel 44. These parcels would remain in the allocation identified and approved in the 2000 Tellico RLMP.
TDEC is the environmental and natural resource regulatory agency in Tennessee with delegated responsibility from the U.S. Environmental Protection Agency (EPA) to regulate sources of air pollution; solid and hazardous waste; radiological health issues; underground storage tanks; and water resources. TDEC has reviewed the Draft EA and has the following comments regarding the proposed action:

**Water Resources**

TDEC has reviewed the Draft EA and concurs that the changes are minor fluctuations to the current parcel allocation percentages and should have no significant impact to the water resources. Any new construction mentioned that would impact the Reservoir such as boat ramps, fishing piers, etc. would require a general or individual Aquatic Resource Alteration Permit (ARAP), depending on the amount of shoreline disturbed. Shoreline stabilization projects would also require an ARAP permit. Projects disturbing more than one acre of land would require a Construction Stormwater Permit. TDEC encourages TVA to include these considerations in the Final EA.

**Geologic Conditions**

The Draft EA does not discuss the geologic conditions in the assessment area. Specifically, there is no mention of the presence or absence of potential geologic hazards, existing mineral resources, historic mining activity, or abandoned oil and gas wells in the various parcels. TDEC encourages TVA to include information in the Final EA regarding these considerations.

Another potential geologic hazard is bedrock that has an acid rock drainage potential. This hazard is not widespread, but according to the Tennessee Department of Transportation database there are parcels (e.g. Parcel 73) with bedrock that contain acid producing rock. TDEC encourages TVA to include a detailed review of the geologic conditions that may impact future land use in the Final EA.

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action, 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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