



United States Department of the Interior

FISH AND WILDLIFE SERVICE

446 Neal Street
Cookeville, Tennessee 38501

May 23, 1996

Mr. Jon M. Loney
Manager, Environmental Management
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902

RECEIVED	
MAY 28 1996	
Doc. No. 163	
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2 DVW/HD	
Environmental Management	

cc -
[unclear]
sent

Subject: Draft Environmental Assessment (EA) for the development of the Little Cedar Mountain Tracts, Nickajack Reservoir, Marion County, Tennessee.

Dear Mr. Loney:

Thank you for providing a copy of your draft EA of April 17, 1996, concerning the potential sale and/or development of Tract No. XNJR-1PT (possible future development), XNJR-3PT (commercial recreation, public recreation, and residential development), XNJR-4PT (commercial recreation), and Tract 5 (access corridor) of the above-referenced properties. The Fish and Wildlife Service (Service) has reviewed the information contained in the draft EA and offers the following comments.

Plant species such as the large-flowered skullcap (*Scutellaria montana*), Price's potato bean (*Apios priceana*), American hart's tongue fern (*Phyllitis scolopendrium*), and Eggert's sunflower (*Helianthus eggertii*) were originally identified by the Service as possibly occurring within the project area (letter of January 26, 1996). The Service requested that the Tennessee Valley Authority (TVA) determine potential impacts to these species and provide the Service an opportunity to review all information used in making your determination. TVA has subsequently concluded that no federally listed plant species occur within the proposed project area. We note, however, that the subject EA contains no information regarding the basis for this conclusion. In the absence of such data, the Service is unable to concur with TVA's determination. The EA should reference the demonstrated absence of suitable habitat, appropriate site surveys, or other basis for TVA's conclusion.

The Service concurs with your determination that the project "may affect" the gray bat (*Myotis grisescens*), Indiana bat (*Myotis sodalis*), and bald eagle (*Haliaeetus leucocephalus*). Given your "may affect" determination for these species, the Service recommends that TVA initiate formal consultation concerning the potential impacts as a result of the proposed project.

We appreciate for the opportunity to comment on this proposal. If you have any questions, please contact Brad Bingham of my staff at 615/528-6481.

Sincerely,

A handwritten signature in cursive script that reads "Lee A. Barclay".

Lee A. Barclay, Ph.D.
Field Supervisor

xc: Reggie Reeves, TDEC, Nashville
Dan Sherry, TWRA, Nashville
Ruben Hernandez, TVA, Knoxville



United States Department of the Interior

FISH AND WILDLIFE SERVICE

446 Neal Street
Cookeville, Tennessee 38501

August 26, 1996

RECEIVED	
AUG 29 1996	
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<i>[Signature]</i>	

Mr. Jon M. Loney
Manager, Environmental Management
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Subject: Response to U.S. Fish and Wildlife Service (Service) comments of May 23, 1996, concerning the revisions to the Draft Environmental Assessment (EA) for the development of the Little Cedar Mountain Tracts, Nickajack Reservoir, Marion County, Tennessee.

Dear Mr. Loney:

Thank you for providing your response to the Service's comments of May 23, 1996, regarding the potential impacts resulting from the proposed development of the Little Cedar Mountain tracts. The Fish and Wildlife Service (Service) has reviewed the new information and offers the following comments.

According to your letter, the Little Cedar Mountain tracts have been surveyed on six different occasions since 1984, resulting in no records identifying the following federally protected plant species: large-flowered skullcap (*Scutellaria montana*), Price's potato bean (*Apios priceana*), American hart's tongue fern (*Phyllitis scolopendrium*), and Eggert's sunflower (*Helianthus eggertii*). Based on the survey work performed by TVA, the Service concurs that the listed plant species do not occur on the affected tracts and, consequently, the proposed development should not have an effect on the species.

The Service concurs with the determination of "no effect" that TVA made concerning the bald eagle (*Haliaeetus leucocephalus*). The bald eagle nest referenced in TVA's letter of June 26, 1996, is located adjacent to Tract 1, which is not slated for development.

Quarry Cave and Little Cedar Mountain Cave were surveyed for the presence of the federally listed gray bat (*Myotis grisescens*) and Indiana bat (*Myotis sodalis*). No bats were found to be using Quarry Cave at the time of the survey. According to the field survey results, most of Quarry Cave appeared to be too dry to support bats, with only the last room having suitable

conditions for bat usage. Evidence of gray bat usage discovered in the Little Cedar Mountain Cave included guano piles and ceiling staining. The investigator estimated that approximately 3,500 gray bats utilize the cave during various times of the year. Another species of bat known to use this cave as a roosting site was the eastern pipistrelle (*Pipistrellus subflavus*). No occurrences of the Indiana bat were noted, but potential foraging habitat and maternity habitat were identified. Based on this fact, the Service recommends that TVA place a restriction on the proposed tracts stating that all land clearing will be completed between October 15 and March 31. During this period, Indiana bat usage of upland forested areas is at a minimum.

The Service recommends that TVA install a suitable bat gate at the entrance to Little Cedar Mountain Cave to prevent human intrusion. Human intrusion can be very detrimental to all bats, especially gray and Indiana bats which tend to be highly sensitive.

As stated in the draft EA, a buffer zone will be required along all shoreline areas except segments allocated for the marina development. Buffer zone widths would vary depending on degree of slope, however, in no instances would this zone be narrower than 100 feet. The Service recommends a buffer zone of similar width be left along all stream channels or drainages associated with the proposed tracts. This would assist in the reduction of sediments entering the reservoir and would also maintain a travel corridor for bats and other wildlife species as they forage throughout these areas. If buffer zones are established along the shoreline and drainages crossing the property, then the Service would concur with a finding of "not likely to adversely affect" for the gray bat and Indiana bat based on project descriptions provided in your letters of April 17, 1996, and June 26, 1996.

The Service strongly discourages the development of public lands. Public lands are being offered for sale or development at an alarming rate. These proposed sales or developments could drastically alter the way in which the public is now able to utilize these areas (i.e., camping, hiking, hunting, backpacking, birdwatching, etc.). We recommend that TVA retain possession of such tracts and maintain them in their natural state to benefit fish and wildlife resources, aesthetics, and public recreation.

We appreciate the opportunity to comment on this proposal. If you have any questions, please contact Brad Bingham of my staff at 615/528-6481.

Sincerely,



Lee A. Barclay, Ph.D.
Field Supervisor

xc: Reggie Reeves, TDEC
Dan Sherry, TWRA
Ruben Hernandez, TVA



DEPARTMENT OF THE ARMY
 NASHVILLE DISTRICT, CORPS OF ENGINEERS
 P. O. BOX 1070
 NASHVILLE, TENNESSEE 37202-1070

June 3, 1996

IN REPLY REFER TO

Planning Branch

Mr. Jon M. Loney
 Environmental Management
 Tennessee Valley Authority
 400 West Summitt Hill Drive
 Knoxville, Tennessee 37902-1499

Dear Mr. Loney:

Thank you for the opportunity to review the Environmental Assessment Recreation Development Alternatives for the Little Cedar Mountain Tracts, Nickajack Reservoir, Marion County, Tennessee. My only comment on the preferred alternative pertains to Department of the Army permit requirements. It appears that some of the possible development actions will require issuance of Section 404 Permits. A commitment should be added in Section 6 to stipulate that proposed development plans will be submitted to the Corps of Engineers for determination of permit requirements and that appropriate permits will be obtained prior to implementation of development plans.

Again, thank you for the opportunity to comment on the Environmental Assessment, and if there are any questions, please contact Tom Swor at the above address or by phone at (615) 736-7666.

Sincerely,

for Blalock

John L. Whisler, Jr.
 Lieutenant Colonel, Corps of Engineers
 District Engineer

*cc Hernandez
 signer*

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Engineer	

JMS



DEPARTMENT OF THE ARMY
 NASHVILLE DISTRICT, CORPS OF ENGINEERS
 P. O. BOX 1070
 NASHVILLE, TENNESSEE 37202-1070

JAN 6 1996

IN REPLY REFER TO

Planning Branch

Tennessee Valley Authority
 ATTN: Jon M. Loney
 400 West Summit Hill Drive
 Knoxville, TN 37902-1499

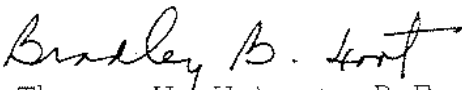
Dear Mr. Loney:

Thank you for the opportunity to review and comment on development of the Shellmound Road Tracts, Nickajack Reservoir, Marion County, Tennessee. The proposal involves making a 701-acre tract of TVA land on Nickajack Reservoir available for commercial recreation, public recreation, and residential development. A second 39-acre tract would be marketed for commercial and public recreation as part of the same proposed action. The proposal would have no effect on any programs being planned or executed by Nashville District, but appears to include activities subject to Department of the Army (DA) permit authority.

The proposed tracts border the Tennessee River, a navigable water of the United States. Any work performed in, over, or across this waterway will require a DA permit pursuant to Section 10 of the Rivers and Harbors Act of 1899. Other work involving a discharge of dredged and/or fill material into waters of the U.S., including streams and wetlands, would require a DA permit pursuant to Section 404 of the Clean Water Act. I assume, as usual, TVA will address its Section 106 responsibilities in the environmental review to ensure that historic properties are considered during project planning and execution.

The Nashville District would appreciate copies of documentation resulting from your environmental review of alternatives for the development. Please feel free to contact Mr. Brad Bishop (615/736-5181) should you have any questions or wish to initiate the DA permit process. Thanks again for including us in your planning process.

Sincerely,

for 
 Thomas W. Waters, P.E.
 Chief, Engineering-Planning
 Division

RECEIVED	
FEB 12 1996	
Doc. No.	25
SEARCHED	INDEXED
✓ FILED	

SC DVW/AD



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

May 30, 1996

Jon M. Loney
 Environmental Management
 Tennessee Valley Authority
 400 W. Summitt Hill Dr.
 Knoxville, Tennessee 37902-1499

**RE: TVA: PROPOSED ENVIRONMENTAL ASSESSMENT OF RECREATIONAL
 DEVELOPMENT ALTERNATIVES FOR LITTLE CEDAR MOUNTAIN TRACTS 1, 2, 3,
 AND 4, NICKAJACK RESERVOIR; MARION COUNTY**

Dear Mr. Loney:

Based on the documentation submitted and a survey report of the project area by the Office of Archaeological Research at the University of Alabama, we concur with the Environmental Assessment by the TVA that site 40MI197 is potentially eligible for listing on the National Register of Historic Places. This site will be impacted by Alternatives 1, 2, and 3. If any of these alternates are chosen, archaeological testing of the site will be necessary to determine its eligibility. Alternate 4 will not impact this site. We further concur with the recommendation that the cemetery, denoted as site 40MI194, be protected no matter which alternate is chosen, and that any future land transfer agreements take into account these site recommendations.

Questions should be directed to Don Merritt at (615) 741-1588. Your cooperation is appreciated.

Sincerely,

Herbert L. Harper

Herbert L. Harper
 Deputy State Historic Preservation Officer

HLH:jdm

*cc Hornandy
 Files
 sign*

RECEIVED	
JUN 7 1996	
Doc. No. <u>37</u>	<i>gms</i>
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Environmental Department	



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 401 Church Street
 Nashville, Tennessee 37243

May 10, 1996

[Draft faxed 5/10/96 4236326855 2:30p/ANB]

Mr. Jon M. Loney
 Manager, Environment Management
 Tennessee Valley Authority
 400 West Summit Hill Drive
 Knoxville TN 37902-1499

*cc Robert Hernandez
 Greg Sagner*

RECEIVED	
MAY 15 1996	
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	<input type="checkbox"/> AD
Environmental Management	

Subject: Project review information for rare, threatened, or endangered species and critical or sensitive habitat, Draft Environmental Assessment-- Development of Little Cedar Mountain Tracts-Nickajack Reservoir

Dear Mr. Loney:

Regarding your letter of April 17, please be advised that a review of our Departmental data bases indicates recorded threatened and/or endangered species within the project boundaries and within a one mile radius of the proposed project. Our records also indicate additional species occurrence records within an approximate four mile radius of the proposed project site(s). The review is for the proposed Environmental review, Draft Environmental Assessment, Recreation Development Alternatives for Little Cedar Mountain Tracts (Tracts #1, #3, and #4, approximately 1378 acres); along the Tennessee River, Nickajack Reservoir, Marion County, TN project site(s). As per your request, the species that have recorded occurrences near the project site(s) are listed by quad map and are attached.

Jon

In addition to the information provided, we have reviewed the subject document and offer the following general comments:

- In order to comply with the National Environmental Policy Act consideration should be given to the comprehensive and *cumulative* impacts associated with the project actions. Considering the information provided, it is probable that any proposed development will increase stream crossings, will affect instream, aquatic, and riparian habitat, and thereby degrade significant habitat as part of the project implementation. The document suggests significant short term and secondary effects of development. The document does not however, outline the anticipated long term effects of habitat loss for this region.

Page 2.

Mr. Loney, TVA

May 10, 1996

- Although TVA outlines some "Commitments" for protection of natural resources, these are not specific and do not address long term protection of habitat and species. I strongly support a no-net loss approach to the management of public lands. The loss of wildlife habitat and lands suitable for recreational uses is an important issue that this Division cannot support. We are opposed to TVA contributing to the fragmentation of forested lands and to the loss of wildlife habitat and recreational resources.
- The document suggests that local economic development is important to this region. Our Department encourages planned and environmentally sound development throughout the State. The document does not address any alternatives of economical development adjacent to, or ancillary to the TVA tracts. Alternatives could be developed using commercially available and private land near the proposed project. Perhaps by utilizing the current recreational values and diverse habitat within these TVA tracts, economic ventures that do *not* deplete the natural resources (and the current land use) could be explored.
- The Department has worked with TVA staff for many years in order to protect large undeveloped tracts. The purpose of this protection is to prolong significant habitat and species biodiversity. The proposed actions are inconsistent with this long-standing cooperative effort.
- During 1992 TVA conducted a Gallup poll of those people using TVA facilities and land. Please note that this poll indicated that 69% of the users wanted to see further protection of public lands in an undeveloped condition, and that 84% of those polled wanted to see TVA lakefront lands maintained for further public use. Additionally, 61% of those polled indicated that the highest priority for TVA should be preserving the environment.
- In summary, considering the Alternatives presented, we find Alternative 4 least objectionable. We still however, have concerns about future options to consider industrial development for these tracts.

Page 3.
Mr. Loney, TVA
May 10, 1996

We appreciate the opportunity to assist you with your pre-project planning. If we can be of further assistance with your project please contact Andrew N. Barrass Ph. D., in our office in Nashville, telephone 615/532-0431.

Respectfully,

A handwritten signature in black ink, appearing to read 'Reginald G. Reeves', followed by a long horizontal line extending to the right.

Reginald G. Reeves,
Director,
Division of Natural Heritage

Attachments: (3)

cc: Dodd Galbreath, TEPO-TDEC
Gary T. Myers, TWRA
Lee A. Barclay, Ph. D., U. S. Fish and Wildlife

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request 12-11-95	
Name Of Project LITTLE CEDAR MT. DEVELOPMENT PROJECT- NICKASACK		Federal Agency Involved TENNESSEE VALLEY AUTHORITY	
Proposed Land Use Commercial Recreation, residential development, RES.		County And State MARION TENNESSEE	
PART II (To be completed by SCS)		Date Request Received By SCS 12/11/95	
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply - do not complete additional parts of this form).		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Average Farm Size 181
Major Crop(s) CORN	Farmable Land In Govt. Jurisdiction Acres: 138505 % 41	Acres Irrigated N/A	Amount Of Farmland As Defined in FPPA Acres: 44699 % 13
Name Of Land Evaluation System Used MARION County	Name Of Local Site Assessment System FPPA	Date Land Evaluation Returned By SCS JAN 5 1996	
PART III (To be completed by Federal Agency)		Alternative Site Rating	
		Site A	Site B
A. Total Acres To Be Converted Directly (2 Tracts)		768	
B. Total Acres To Be Converted Indirectly		0	
C. Total Acres In Site		768	
PART IV (To be completed by SCS) Land Evaluation Information			
A. Total Acres Prime And Unique Farmland		397	
B. Total Acres Statewide And Local Important Farmland		N/A	
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted		29	
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value		14	
PART V (To be completed by SCS) Land Evaluation Criterion			
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)		88	
PART VI (To be completed by Federal Agency)			
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))	Maximum Points		
1. Area In Nonurban Use	15	12	
2. Perimeter In Nonurban Use	10	10	
3. Percent Of Site Being Farmed	20	10	
4. Protection Provided By State And Local Government	20	0	
5. Distance From Urban Builtup Area	15	10	
6. Distance To Urban Support Services	15	10	
7. Size Of Present Farm Unit Compared To Average	10	10	
8. Creation Of Nonfarmable Farmland	10	5	
9. Availability Of Farm Support Services	5	5	
10. On-Farm Investments	20	0	
11. Effects Of Conversion On Farm Support Services	10	0	
12. Compatibility With Existing Agricultural Use	10	2	
TOTAL SITE ASSESSMENT POINTS	160	74	
PART VII (To be completed by Federal Agency)			
Relative Value Of Farmland (From Part V)	100	88	
Total Site Assessment (From Part VI above or a local site assessment)	160	74	
TOTAL POINTS (Total of above 2 lines)	260	162	
Site Selected:	Date Of Selection	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Reason For Selection:			



TENNESSEE WILDLIFE RESOURCES AGENCY

ELLINGTON AGRICULTURAL CENTER
P. O. BOX 40747
NASHVILLE, TENNESSEE 37204

December 19, 1995

Mr. Jon M. Loney, Manager
Environmental Management
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902-1499

re: INTERGOVERNMENTAL REVIEW -- DEVELOPMENT OF THE
SHELLMOUND ROAD TRACTS, NICKAJACK RESERVOIR,
MARION COUNTY, TENNESSEE

Dear Mr. Loney:

The Tennessee Wildlife Resources Agency has been interested in the 701 acre Shellmound Tract (Tract No. XNJR-2PT) for many years as documented in comments to the Nickajack planning process in the late 1980's. This tract is one of the last remaining properties of significant size in the vicinity of Chattanooga that remains potentially available for wildlife recreation. Our plans were to have cooperated with Quail Unlimited in order to improve habitat for upland species and provide dog training opportunities for the public.

As we have commented in the past, we recommend that these tracts remain dedicated to public recreation and are disappointed to see that TVA is proposing to expand the options for use of these properties to commercial and residential development. We hope that TVA instead will consider the need for balance between open lands available to the public to offset rapidly expanding private development and the unique opportunity TVA has to serve the former.

Thank you for considering these comments.

Sincerely,

Gary T. Myers
Executive Director

GTM/bjs

cc: Mr. Reid Tatum - TWRA

The State of Tennessee

AN EQUAL OPPORTUNITY EMPLOYER

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

446 Neal Street
Cookeville, Tennessee 38501

January 26, 1996

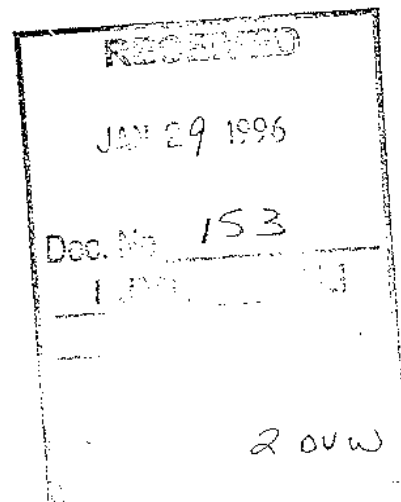
Mr. Jon M. Loney
Manager, Environmental Management
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Dear Mr. Loney:

The Fish and Wildlife Service (Service) has evaluated potential environmental impacts concerning the proposed development of two TVA tracts of land on Shellmound Road in Marion County, Tennessee, as requested in your letter of November 22, 1995. The Service has also investigated the existence of threatened and/or endangered species as requested in your letter of December 8, 1995. TVA proposes to offer a 701-acre tract (Tract No. XNJR-3PT) for commercial recreation, public recreation, and residential development; and a 39-acre tract (Tract No. XNJR-4PT) for commercial and public recreation. Both tracts are located on Nickajack Reservoir.

The Shellmound Tracts are within the range of the Federally endangered Indiana bat, *Myotis sodalis*, gray bat, *Myotis grisescens*, and large-flowered skullcap, *Scutellaria montana*; and the Federally threatened bald eagle, *Haliaeetus leucocephalus*, Price's potato bean, *Apios priceana*, American hart's tongue fern, *Phyllitis scolopendrium*, and Eggert's sunflower, *Helianthus eggertii*. You should assess potential impacts and determine if the proposed development may affect the species mentioned above. A finding of "may affect" could require initiation of formal consultation.

Transfer of TVA lands from public ownership could potentially allow changes in land use practices from low-impact recreational use to high-impact recreational use and high-density residential development. Such changes would have negative impacts on fish and wildlife resources in the area, such as a significant increase in shoreline degradation, loss of habitat and habitat types, and a potential increase in sedimentation to streams and the reservoir. Shallow lacustrine wetlands which are located along the shorelines of the Shellmound Road Tracts could be adversely influenced by development, potentially requiring mitigation. Wetlands such as these serve as spawning and nursery areas for aquatic resources, and as forging areas for the Indiana bat, gray bat, and bald eagle. Bald eagles are known to nest in the vicinity of Nickajack Dam. A nest which has been active for the past several years is located within two miles of the



Shellmound Tracts. Nickajack Cave, a known maternity colony for gray bats and wintering area for Indiana bats, lies directly across the reservoir from the Shellmound Tracts. Habitat manipulation on the Shellmound Tracts could affect the existing streams and shorelines which provide foraging areas for local bat and eagle populations.

The proposed development could drastically alter the way in which the public is now able to utilize the area (i.e., camping, hiking, hunting, backpacking, birdwatching, etc.). We recommend that TVA retain possession of the tracts and maintain them in their natural state to benefit fish and wildlife resources, aesthetics, and public recreation.

Please provide us with a copy of the Environmental Assessment (EA) for review and comment. We appreciate the opportunity to comment on this proposal. If you have any questions, please contact Brad Bingham of my staff at 615/528-6481.

Sincerely,



Lee A. Barclay, Ph.D.
Field Supervisor

xc: Reggie Reeves, TDEC, Nashville, TN
Bob Hatcher, TWRA, Nashville, TN
Ruben Hernandez, TVA, Knoxville, TN



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

May 3, 1996

Mr. Jon M. Loney
Environmental Management
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902-1499

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MAY 13 1996	
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Dear Mr. Loney:

In my role as one of the Department of Environment and Conservation's reviewers of environmental assessments, I have reviewed the document entitled *Draft Environmental Assessment, Recreational Development Alternatives for the Little Cedar Mountain Tracts* transmitted to me on April 20, 1996. I offer the following general comments for your consideration.

The Division of Water Pollution Control is concerned about the potential negative impacts of the preferred alternative on water quality. Sources of concern include construction runoff, alteration of aquatic resources, and disposal of domestic wastes. We appreciate TVA's commitment to require the use of appropriate erosion controls on the private development component of the proposal.

The problem of appropriate sewage disposal from a development of this size is not a small matter. Jasper may be unable to accept additional flow at its present facility without plant modifications. The suggestion that a more localized sewage treatment works could be constructed in conjunction with the development is also problematic. The Division would be unlikely to permit such a treatment facility unless a legally viable and continuing entity is created to be responsible for the operation of the facility and the quality of the discharge.

If you have questions concerning my comments, please contact me at 615-532-0699.

Sincerely,

Gregory M. Denton, Manager
Planning and Standards Section

FRED THOMPSON
TENNESSEE

United States Senate

WASHINGTON, DC 20510-4204

November 2, 1995

Mr. Ruben O. Hernandez
Vice President
Land Management
Tennessee Valley Authority
17 Ridgeway Road
Norris, Tn 37828-0920

11/2/95
23164

✓	HERNANDEZ	AC
	QM	
	BOS	
	EC	
	RA	
CC	RLM	
	RM	

Dear Mr. Hernandez:

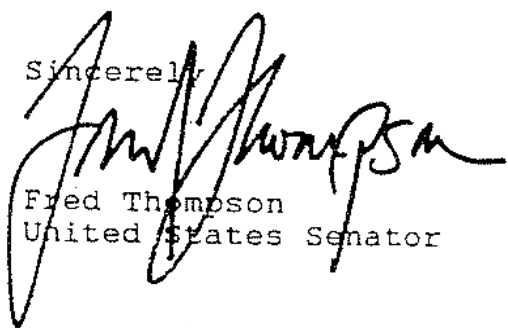
Both local officials and private citizens have approached my office to discuss the disposition of a parcel of Tennessee Valley Authority property known as Little Cedar Mountain. It is my understanding that your office is in the process of deciding the potential land use options for this parcel.

These local interests suggest that the area be opened up for multi-use purposes beyond recreation. Multi-use would seem to have an enormous beneficial impact on Marion County. I ask that you consider these alternatives as you formulate your decision on the disposition of this piece of land.

I know that your office is striving to determine the best use of this land for TVA, Marion County, and Southeast Tennessee. I applaud these efforts and hope that you will factor in the needs and wishes of the local community in your decision making process.

Thank you for your time and consideration of this important issue.

Sincerely,



Fred Thompson
United States Senator

FDT:sjb

RLC:CJG--11/20/95

cc: Harold M. Draper, WT 8C-K--For information.
Jonny M. Loney, WT 8C-K--For information.



TENNESSEE WILDLIFE RESOURCES AGENCY

ELLINGTON AGRICULTURAL CENTER
 P. O. BOX 40747
 NASHVILLE, TENNESSEE 37204

MAY 2 1996

Land Management
 Chickamauga and
 Nickajack Reservoirs

LJC
RJL
DEN
VPY
SLL
JHL
MBH
RMK
MRC
Tract Files
General Files

April 29, 1996

Mr. Lee J. Carter
 Tennessee Valley Authority
 1101 Market Street, LMO 1A-C
 Chattanooga, TN 37402-2801

re: Draft Environmental Assessment, Recreation Development Alternatives For the Little Cedar Mountain Tracts, Nickajack Reservoir, Marion County

Dear Mr. Carter:

During the earlier Intergovernmental Review of the proposed alternatives for the Little Cedar Mountain Tracts, the Tennessee Wildlife Resources Agency expressed its disappointment with the concept of transferring public TVA lands to private development. Our long-term interest in the Shellmound Tract (No. XNJR-3PT) was also reiterated.

Our position regarding privatization of public lands remains and we would prefer that the Shellmound Tract not be developed as proposed in the Draft Environmental Assessment (EA). The impacts of that decision, however, are somewhat mitigated by the proposed dedication of Tract No. XNJR-IPT (Tract I) to wildlife management. There is promise in the wildlife development potential of this tract.

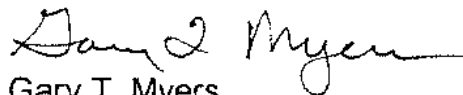
This agency supports Alternative 2 (the preferred alternative) presented in the EA. There are several considerations, however, that we would request be made as the Shellmound tract is developed for residential and commercial (Shellmound Recreation Area) interests:

- Some of the best aquatic vegetation in Nickajack Lake exists adjacent to the shoreline of the Shellmound Tract. The presence of this vegetation attracts heavy bass fishing pressure. It is important that, as residential development progresses, pressure to control and eliminate this vegetation is not successful.

- TVA is now in the process of developing a comprehensive shoreline development policy called the TVA Shoreline Management Initiative. TWRA has recently commented on the DEIS for this policy initiative and is very supportive of its most environmentally sensitive alternatives. The policy initiative is not mentioned in the subject EA. We request, however, that the principles of that initiative be applied in the form of requirements on developers for shoreline buffer zones and restrictions on dredging, docks, as other structures.
- The EA mentions the potential for impacts to endangered gray and Indiana bats with commercial and residential development on any of the three tracts addressed. We emphasize the importance of the protective measures described in the EA.
- The Shellmound Tract now provides excellent upland wildlife habitat. Developers should be encouraged to protect as much of that habitat as possible when undertaking residential planning. Avoiding structural sprawl and leaving significant open spaces would be concepts contributing to the salvaging of at least some of the habitat that exists now.

Although we regret the concept that would shift public resources to the hands of private development, we appreciate the consideration of wildlife interests with the dedication of Tract I to same. Coupling this dedication to responsible development of the Shellmound Tract will hopefully result in a balanced approach. Thank you for considering this comment.

Sincerely,



Gary T. Myers
Executive Director

GTM/bjs

cc: Reid Tatum - TWRA
Dan Sherry