Paul R. Isbell Cookeville, Tennessee Comment:

> Paul R. Isbell 4399 Buck Mountain Road Cookeville, TN 38506 (931) 537-9733

January 3, 2008

James F. Williamson, Jr. Tennessee Valley Authority 400 West Summit Hill Drive WT 11D Knoxville, Tennessee 37901

Dear Mr. Williamson:

Thank you for sending me a copy of the Draft Environmental Assessment for the "Power Supply Upgrade – Algood 161-KV Transmission Line Project" and for extending the deadline for comments until January 15, 2008. Without the extension, it would have been difficult for me to provide comments due to holiday travel. This project has been very controversial and there is much interest and many questions concerning the issue.

Before I comment on the Environmental Impact Assessment (EIA), I would like to provide some information on other issues pertaining to this project. This project was requested by the Upper Cumberland Electric Membership Cooperative (UCEMC) whose executives have refused to communicate with the citizens and landowners affected by the power line. After numerous inquiries about the need for this project, UCEMC and TVA stated that the additional power was needed because three new industries and a 400-unit apartment complex were going to be located in the Algood area. I have personally discussed these claims with Algood City Officials and Putnam County Chamber of Commerce Officials and have been assured that the information is false and that no industry or large apartment complexes are planning to locate in the Algood area.

This entire area has lost more industry in the past five years than it has gained. Industries such as TRW, Russell Stover and Norwalk have closed their doors putting hundreds of employees out of work. Other smaller industries have left or downsized and no new industry is filling the void. The Chamber is working hard to attract new industry with little success. Even the housing industry has slowed and hundreds of homes are on the market with few buyers in the market.

The economy is slowing and UCEMC is asking TVA to build a multimillion-dollar transmission line that isn't needed. There are no new industries coming and no large apartment complexes. In fact, the City of Cookeville recently annexed 1200 residential customers from UCEMC. Although UCEMC refuses to release load data to us, I would venture to speculate that the needs for electricity in the Algood area would decline rather than increase. Also, the City of Cookeville has stated that they have excess electrical supply that they would provide to Algood if it were needed.

#### Isbell - page 2

As the major source of electrical power in this region I think that TVA should provide guidance and leadership to their customers. TVA should be seeking ways to conserve resources and encourage customers to work together to provide electricity as economically and efficient as possible. This power line has become a major controversial issue in this community and TVA should listen to the public outcry and validate the need or lack there of for this project before proceeding.

I have reviewed the Environmental Impact Assessment (EIS) and found it to be lacking in many respects. I observed many of the personnel who came out to look at various environmental issues and quickly realized that they were working under a deadline to move this project along rather than genuine concern for the environment. As a landowner who lives within the route of this line, I feel that TVA should make a concerted effort to protect the environment as though TVA employees were living here.

This project will result in the destruction of over thirty (30) acres of forest in the Buck Mountain area. I find this very significant when considering that other routes could reduce this destruction to zero. Trees are very valuable to the environment and with the global warming threat TVA should be very concerned about this forestland. These forests are already stressed due to the lack of rainfall and extreme heat of recent years. Many trees are dying and the segmentation caused by this line will only add to the problem.

The destruction of habitat for endangered animal and plant species is also a major concern that should not be taken lightly by TVA. The EIS was conducted at a time when most endangered plant species were not in bloom and could not be recognized and animal species would not be active. Also, the sites most likely to produce endangered species were ignored. A cave on my property is one of the most likely habitats for the Indiana Gray Bat and it was not surveyed during the assessment. The power line route through my property will also result in the destruction of a grove of shagbark hickory trees that are a favorite habitat for the Indiana Gray Bats.

The route on Buck Mountain will also have a negative impact on the water shed. There is a large network of caves, springs and underground streams that supply water to the valley below. Erosion and runoff from chemicals used to kill vegetation will invade this water supply and create a hazard for residents in the valley below. The Hidden Hollow Recreation Area Lake receives water from this underground network. This is a public recreation area where people go to swim and fish.

The Buck Mountain area is rich in prehistoric and Native American artifacts. Personnel performing the EIA utilized a very superficial methodology and yet evidence was found which should indicate a need for further investigation and study. Native American organizations are becoming aware of this project and are expected to get involved very soon. The invasion of Native American burial mounds and the destruction of prehistoric and Native American artifacts are totally unacceptable and something I am sure TVA would not want to be responsible for causing.

#### Isbell - page 3

In summary, there are many elements of the EIA that raise questions and issues requiring further study and research. If, after further analysis to determine if there is a valid need for this project TVA decides to go forward, a complete and comprehensive Environmental Impact Study (EIS) should be performed. A full study should be conducted to include all seasons of the year when various species are normally in evidence. Extensive research of prehistoric and Native American evidence should be conducted by personnel qualified in that field. Also, tests should be conducted to identify the underground water flows from the mountain and the impact of the project on these water sources.

Thank you again for allowing me the opportunity to comment on the Environmental Impact Assessment. I hope that my comments will be of assistance. If you have questions or wish to discuss any of the issues I have presented, please feel free to contact me.

Sincerely,

Paul R. Isbell

LTC. U.S. Army (Retired) Vice President, TTU (Retired)

#### Bower L. (Bob) Johnston

Cookeville, Tennessee

Comment:

I am a retired professor of physical education from Tennessee Tech University. I purchases 27 acres on Buck Mountain in 1972, built a house in 1976, and remodeled in 2006. This property has spectacular views overlooking Cookeville and has unique features such as sink holes, a cave, and a rock house. I have developed hiking trails over all the acreage and keep them cleared for the enjoyment of the family--wife, children, and grand children. The transmission line runs across an area of mature forest on my property. There are several trees along the proposed line that are 30+ inches dbh and stand over 100 feet tall. One of my hiking trails runs through this area. It will never be the same without the mature trees, but at least I hope the stumps and tree tops will be removed so the trail will be usable in the future. Also, trees will have to be removed along my driveway. The TVA land appraisers indicated these stumps and tree tops would be chipped, but I have had people tell me that TVA would not be responsible for removing stumps and tree tops. A building site along the driveway will be made useless. These sites document the areas that I have described.

http://www.flickr.com/photos/b | johnston/sets/72157601371553719/ http://www.flickr.com/photos/b | johnston/sets/72157601497752102/ http://www.flickr.com/photos/b | johnston/sets/72157601504568911/

Your recent environmental report left out several things I have witnessed through the years. In the 1970's I invited a friend of mine who was a professor of Earth Science at TTU to help me design a water system from a spring in my cave to my house. When he saw the cave, he said he had conducted a dye test in the cave to determine where the water in the cave surfaced. He indicated the dye surfaced in the historically and ecologically important Booger Swamp. This could especially impact the use of herbicides along the proposed transmission line.

I took one of the TVA biologists into a very deep sink hole that begins within the R-O-W of the transmission line. She felt cold air coming from several places in the bottom of the sink hole. Herbicides would naturally run off into this sink hole and probably enter an underground aquifer. Also the sink hole blooms every spring with several types of trilliums. I would hate to lose this feature due to herbicides.

I have witnessed cranes using the small pond on the adjacent Hawkins property. I am not sure what type cranes they are, but they are very noisy.

I have witnessed bobcats and red foxes on my property in addition to the mammals in the report.

Please consider these items when making decisions.

Thank you,

Bower L. (Bob) Johnston"

#### Jon Jonakin

Cookeville, Tennessee

Comment:

The proposed transmission line expansion in Algood is especially troubling to me in light of TVA's apparent reluctance to practice full disclosure of information that TVA has and that relates to the proposed construction. As an economist, I understand that information is critical in attempting to determine if the benefits of any project outweigh the costs. In the case of the current proposal, it appears that TVA not only is unwilling to release the full body of data that relate to the proposal, but that some of the information that has been released is now apparently invalid. I am referring in particular to the proposed 400 unit apartment complex that was used, in part, as a justification for the project and that has now apparently been scrapped. The failure to disclose information in these matters and the current irrelevance of information that has been released raises serious questions as to the legitimacy of the proposed project and of the trustworthiness of TVA itself. I urge TVA to fully disclose all reports and data they have that related to the Algood project and that TVA revise any reports that make claims that can no longer be substantiated. Thank You, Jon Jonakin, PhD Economics

#### Lawrence R. Klem

Cookeville, Tennessee

Comment:

"The TVA needs to show the citizens of Putnam County and specifically Algood why this line has to go up Buck Mountain and destroy so much wildlife habitat. Since an alternative route has been suggested alond the Hwy 111 ROW that wouldn't impact people and wildlife has any further study been done? We have a right to know why this line has to go where TVA and UCEMC say it does. TVA and UCEMC have a responsibility to their customers especially and to all of Putnam County to work with folks in the line of proposed construction and to lessen environmental impacts where ever they can. I think it's a shame how you all are trying to bulldoze this transmission line through.

Sincerely, Lawrence R. Klem"

#### **Robert and Velda Koger**

Cookeville, Tennessee Comment:

"As a resident of this area, my husband and I would like to compliment you and TVA on making the choice to bring the proposed line down the mountain rather than taking the homes of those of us who live on Old Qualls Rd. and other streets at the foot of the mountain.

To our way of thinking, it is a very humanitarian effort and decision to decide to take some trees rather than homes. I have looked at some of the environmental study and really cannot see that much damage to the view, the animals, or the soil for farming.

We and our neighbors thank you,

Robert and Velda Koger"

#### **Mary Mastin**

Upper Cumberland Group of the Sierra Club Cookeville, Tennessee Comment:



January 14, 2008 Electronically - Hard copy to follow

James F. Williamson, Jr. Tennessee Valley Authority 400 West Summit Hill Drive WT 11D Knoxville, Tennessee 37901

Phone: (865) 632-6418 Fax: (865) 632-3451

e-mail: jfwilliamson@tva.gov

Re: Algood 16-kV Transmission Line

Please accept these comments on behalf of the Upper Cumberland Group of the Sierra Club.

The draft Environmental Assessment (EA) does not contain an adequate assessment of impacts to the natural and human environment. The Sierra Club does not believe that this EA will support a finding of no significant impacts. Under the National Environmental Policy Act (NEPA), a full Environmental Impact Statement (EIS) should be prepared..

## I. TVA Has Not Demonstrated the Purpose and Need for this Project.

Initially, the Sierra Club notes that although requested by commenting organizations and individuals, UCEMC and TVA have not been willing to release the studies they cite as evidence of the need for more power lines. Without public access and scrutiny it is impossible to determine if the projections are based on faulty assumptions. The failure of TVA to provide the

1

underlying documentation for its EA violates the following Council of Environmental Quality regulation regarding agencies obligations for public involvement under NEPA.

Agencies shall:

(f) Make environmental impact statements, the comments received, and any underlying documents available to the public pursuant to the provisions of the Freedom of Information Act (5 U.S.C. 552), without regard to the exclusion for interagency memoranda where such memoranda transmit comments of Federal agencies on the environmental impact of the proposed action. Materials to be made available to the public shall be provided to the public without charge to the extent practicable, or at a fee which is not more than the actual costs of reproducing copies required to be sent to other Federal agencies, including the Council.

40 CFR Sec. 1506.6.

The draft EA states that this project is needed because

- Three large industries are relocating to the Algood area.
- A large 400 unit apartment complex will be built in Algood.
- Hundreds of new homes will be constructed in the Algood area.

According to information provided to the Buck Mountain Community Organization, the Algood City Planner and the Putnam County Chamber of Commerce have no knowledge of any new large industries moving into the Algood area. The developers of the 400 unit apartment complex have apparently decided not to build the complex. As is well known, nationally and locally the building boom bubble has burst and new home construction around the country is on the decline.

The Buck Mountain Community Organization reports that in an interview with the Herald Citizen's Liz Engel, TVA essentially admitted there are no new known industries coming to Algood. When asked to identify the sources of the projected 8 megawatt increase in peak demand for the Algood substation, TVA's Allen Miller could not identify any new industries coming to the Algood area. He said there was speculation about some possible new retail stores and a

2

school. Algood City Manager, Freddie Maxwell, also said he had no knowledge of any new industries coming into the area. In any event, the most optimistic speculation about possible new businesses do not justify a projected 8 megawatt increase in peak demand for the Algood substation. In fact, with the loss of customers to Cookeville Electric there may be no increase in peak demand, or even a decrease in demand. Future annexations of customers by Cookeville Electric that are part of the State approved Cookeville Urban Expansion Growth Boundary will involve the additional loss of customers at the UCEMC Algood substation.

The projection of growth for UCEMC customers also did not take into account the loss of over 1200 customers UCEMC lost to Cookeville Electric, additional customers that UCEMC is scheduled to lose to Cookeville Electric as part of Cookeville's Urban Expansion Plan.or other ways to remove the load from the Cookeville West substation or the Algood substation. There was no consideration of redistributing customers to other substations. No consideration was given to the use of distributed power generation in the area other than saying that it would take too long to implement. TVA has been advised that Tennessee Technological University has generators that could be used for Peak Demand that would produce 8 megawatts of power.

Tennessee Technological University is willing to sell these generators to TVA to reduce this load. These generators would also serve as back up power in case a line went down.

Courts have found EIS's invalid where an agency relies on inflated estimates of market demand for or benefit of a project. NRDC v. US Forest Service, 421 F.3d 797 (9th Cir. 2005) and Hughes River Watershed Conservancy v. Glickman, 81 F.3d 437, 446-448 (4th Cir. 1996).

A. The projections of energy savings from new public awareness of the need for energy conservation and energy efficiency are very underrated in this draft EA.

Studies show that Tennesseans use more electric power per residence than citizens in any other state. TVA encourages high electric consumption through many of its policies. These policies are bad for the environment. They contribute to global warming and the degradation of our beautiful Tennessee environment that attracts tourists.

TVA has already been criticized for not doing enough to promote conservation by the GAO. The March 8, 2002 United States General Accounting Office Report to the Chairman, Subcommittee on Legislative, Committee on Appropriations, House of Representatives March 2002, AIR QUALITY - TVA Plans to Reduce Air Emissions Further, but Could Do More to Reduce Power Demand:

Although TVA's demand-side management programs provide opportunities for thousands of its customers to reduce their consumption of electricity, these programs make modest contributions to reducing peak-time demand—an average of 41 megawatts annually between 1996 and 2000 (equivalent to 1/10th of 1 percent of TVA's peak capacity). This reduction is less than it otherwise could be, in part because TVA has limited the scope of its key program to reduce peak-time consumption by residential customers; TVA believes the program is not cost-effective. TVA projects that its demand-side programs will produce nearly twice as much in savings during the period 2001 through 2005 as was achieved in the previous 5 years. However, about a third of this projection is based on the expected success of a program that began in June 2001. In October 2001, TVA began an evaluation of short-term opportunities to improve and expand its demand-side management programs.

Other large utilities have more fully implemented the types of programs that TVA currently has in place and have also implemented a greater array of demand-side management tools. For example, like TVA, Florida Power and Light offers its residential customers a bill credit for allowing their water heaters and air conditioners to be switched off during periods of peak demand. However, Florida Power and Light has involved a much higher proportion of its residential customers in its program (about 19 percent) than has TVA (about 2 percent). Unlike TVA, Puget Sound Energy piloted a "time-of-use" program for 300,000 of its 1.4 million residential customers to encourage less electricity used during periods of peak demand. The utility established different prices for electricity used during four periods of the day—ranging from 6.5 cents per kilowatt hour at night to

9 cents per kilowatt hour during the day—and its customers' bills depend on the amount of electricity used during each period. As a result of the program, customers shifted, on average, about 5 percent of their demand from peak to off-peak hours.
In light of the limited scope and impact of TVA's current demand-side management programs when compared to similar programs managed by other utilities and the potential benefits (including reduced emissions) that may be achieved through the use of additional demand-side management tools, we are recommending that TVA evaluate the structure and effectiveness of its current programs, review the longer-term potential applicability of other programs to its power system, and, as appropriate, expand its demand-side management programs.

March 8, 2002 United States General Accounting Office Report to the Chairman, Subcommittee on Legislative, Committee on Appropriations, House of Representatives March 2002, AIR QUALITY - TVA Plans to Reduce Air Emissions Further, but Could Do More to Reduce Power Demand.

The Sierra Club believes that as the public becomes more aware of the implications of electricity usage on global warming that the public will become more and more interested in energy conservation and efficiency. Thus, we believe TVA's projections of energy savings from new public awareness of the need for energy conservation and energy efficiency are very underrated in this draft EA.

B. The Draft EA is Arbitrary and Capricious in its Failure to Assess the Global Warming Impacts of This Project.

TVA's draft EA gives short shrift to the Sierra Club's concerns regarding global warming and failed to include the IPCC report as requested in our March 15, 2007 comments. Yet warming of the climate system is unequivocal, as is now evident from observations of increases in global average air and ocean temperatures, widespread melting of snow and ice, and rising global average sea level (IPCC 2007). Recent studies indicate to a 90% certainty that the globally averaged net effect of human activities since 1750 has been one of warming (IPCC 2007). The observed widespread warming of the atmosphere and ocean, together with ice mass loss, support the conclusion that it is extremely unlikely that global climate change of the past fifty years can be explained without external forcing, and very likely that it is not due to known natural causes alone (IPCC 2007). Continued greenhouse gas emissions at or above current rates would cause further warming and induce

many changes in the global climate system during the 21st century that would very likely be larger than those observed during the 20th century (IPCC 2007).

These increases could have a profound impact on natural ecosystems, human health, and the economy. For instance, global warming may increase sea level and lead to more frequent, more severe storms, disrupting the lives of the fifty-three percent of Americans living in the coastal zone. The economy of western states may suffer because reduced annual snow pack will increase water scarcity. Also, higher temperatures may increase heat-induced health problems and change the distribution of vectors of infectious disease, like rodents and mosquitoes

As early as 2003, federal courts have recognized the need for an analysis of the global warming impacts from increased burning of greenhouse gases in discrete, not easily calculable amounts. In Mid-States Coalition for Progress v. Surface Transportation Board, 345 F.3d 520 (8th Cir. 2003), the 8th Circuit remanded a Surface Transportation Board licensing decision because the EIS failed to consider the environmental implications of the air pollution (CO2 and other pollutants) that would be generated when the hauled coal is burned in power plants. See also Border Power Plant Working Group v. Department of Energy, 260 F.Supp.2d 997 (S.D. Cal. 2003). In more and more other cases, as global warming science is beginning to be more widely recognized and accepted courts are deciding whether agencies have taken a sufficiently "hard look" at the potential environmental consequences of their contributions to global warning. Friends of the Earth v. Mosbacher, formerly Friends of the Earth v. Watson, 2005 WL 2035596 (N.D.Cal. Aug 23, 2005) (challenge to financial support for overseas fossil fuel development provided by the Export Import Bank and the Overseas Private Investment Corporation based on failure to consider impact on global warning under NEPA; the District Court denied defendants' motion for summary

6

judgment.)

II. There will be Significant Impacts to the Environment from this Project.

A. The Draft EA is Arbitrary and Capricious in that It Does Not Adequately Analyze the Impacts to the Environment from this Project.

The draft EA recognizes the ecological importance of the area that would be disturbed by this project. At least 33 caves have been reported within three miles of the proposed newtransmission line route, pp. 25-26 ("Numerous other caves occur closer to the proposed new transmission line route and offer potential gray bat roosting habitat...", p. 31). ... "Additionally, the Highland Rim is host to the most diverse fish fauna of any region of comparable size in North America (Etnier and Starnes 1993) ... Five watercourses were spring heads located in or near the right-of-way. Watercourses documented during the field survey were typical of the Highland Rim region as described above. One perennial stream that would be crossed by the proposed transmission line, the Falling Water River, is considered a high quality stream by the Tennessee Department of Environment and Conservation (TDEC) and is listed on the TDEC 303d list as impaired due to loss of biological integrity because of siltation (TDEC 2006). The Falling Water River is listed on the Nationwide Rivers Inventory (see Section 3.8). p. 29.

The EA recognized that the federally listed as endangered gray bat roosts in caves yearround and typically forage over streams, rivers, and reservoirs provide low-quality foraging
habitat and that two caves in Putnam County have records of gray bats. These caves are 3.2 and
3.8 miles from the proposed new transmission line, and 2.7 and 3.2 miles from the existing
transmission line to be sold.

Yet, caves which were most likely to have endangered bats were completed neglected

while no complete cave inventories were conducted despite the fact that researchers have found the caves on the Cumberland Plateau to rich in biodiversity. Even though TVA was provided with information that cavers had found rare and previously unidentified species in one cave along the route, no cave surveys were done by TVA.

#### B. There Was No Consideration of Cumulative Impacts.

The draft EA recognizes that the endangered "Cerulean Warbler occurs largely in unfragmented, mature deciduous forests, particularly along floodplains or other mesic areas that the mature forests found along the proposed new transmission line route provide habitat for this species, specifically, the one mile of dry ridgetops and moist coves east of the proposed substation site. Although cerulean warblers were not observed during field inspections of the proposed transmission line or the existing transmission line to be sold, numerous records exist for Putnam County. Habitat along the proposed route as it heads south towards the proposed tap point is of lower quality." p. 33 (emphasis added).

The draft EA recognizes that "Central Tennessee is one of the faster growing areas in the United States. The Cookeville area has experienced residential and commercial growth into previously rural areas and forested areas. The study area has been disturbed and modified by previous human alterations of the landscape", p, 49. Yet the draft EA incorrectly concludes that: "Overall, forest conversion would be regionally insignificant due to the high amount of habitat fragmentation that already exists along the proposed route." p. 48.

NEPA requires that the reviewing agency look at the cumulative impacts to the environment, including past and future impacts. CEQ 2005 guidance. Oregon Natural Resources Council Fund v. Brong, 492 F.3d 1120 (9th Cir. 2007). TVA has made precisely the wrong

8

conclusion here. Further fragmentation of the forest, when combined with past fragmentation

will have a significant impact on the warbler and other species that rely on our forests.

C. There Was No Consideration of Impacts to Native American Artifacts.

Despite the fact that the Buck Mountain Community Organization provided substantial

documentation of artifacts recovered around the projected transmission line and expert letters

about the presence of extensive Native American habitation of the region, no mention is made of

the Native American burial mound along the route or the burial cave in the area or of Native

American artifacts found along the route.

Finally, many of the species such as endangered bats, the Cerulean Warbler, and trillium

were not studied during the appropriate time of the year. The two caves closest to the line most

likely to have endangered bats were not studied. All alternative routes should be fully evaluated.

The Sierra Club asks that TVA find that there will be significant environmental impacts

from this project and that a full environmental impact statement be completed.

Thank you for the opportunity to make these comments.

Sincerely,

Mary M. Mastin

Conservation Chair,

Upper Cumberland Group, Sierra Club

#### **Silas Mathes**

Tennessee Department of Environment and Conservation Division of Natural Areas Nashville, Tennessee Comment:



## STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Natural Areas 14th Floor L&C Tower 401 Church Street Nashville, Tennessee 37243-0447 Phone 615/532-0431 Fax 615/532-0231

December 4, 2007

Kimberly Choate Siting and Environmental Design Tennessee Valley Authority 1101 Market Street Chattanooga, TN 37402-2881

Subject: Algood Transmission Line Delivery Point, Putnam County, TN

Dear Ms. Choate:

Thank you for your recent letter requesting Division of Natural Areas comments for the Putnam County 161kV Algood transmission line project in Putnam County, Tennessee. We have reviewed the letter and accompanying maps with respect to rare species observations and offer the following comments.

In the immediate vicinity of the project (one-mile radius), our database contains observations of two rare animals, the state deemed-in-need-of-management meadow jumping mouse and the state-rare green salamander. The meadow jumping mouse has been observed very close (within 100 yards) to the transmission line corridor, approximately 1/3 mile east of the Algood 69 kV substation.

Within four miles of the proposed transmission line corridor, the following rare species have been observed:

| Туре               | Scientific Name      | Common Name          | Global Rank | State Rank | Federal Status | State Status |
|--------------------|----------------------|----------------------|-------------|------------|----------------|--------------|
| Amphibian          | Aneides aeneus       | Green Salamander     | G3G4        | S3S4       | **             | **           |
| Bird               | Aimophila aestivalis | Bachman's Sparrow    | G3          | S2         | **             | E            |
| Fern and Fern Ally | Botrychium jenmanii  | Alabama Grapefern    | G3G4        | S1         | **             | T            |
| Flowering Plant    | Hydrastis canadensis | Goldenseal           | G4          | S3         | **             | S-CE         |
| Flowering Plant    | Lilium canadense     | Canada Lily          | G5          | S3         | **             | T            |
| Flowering Plant    | Trillium pusillum    | Least Trillium       | G3          | S2         | **             | Е            |
| Mammal             | Myotis grisescens    | Gray Bat             | G3          | S2         | LE             | Е            |
| Mammal             | Neotoma magister     | Eastern Woodrat      | G3G4        | S3         | **             | D            |
| Mammal             | Sorex cinereus       | Common Shrew         | G5          | S4         | **             | D            |
| Mammal             | Sorex longirostris   | Southeastern Shrew   | G5          | S4         | **             | D            |
| Mammal             | Zapus hudsonius      | Meadow Jumping Mouse | G5          | S4         | No Status      | D            |

#### Mathes – page 2

The Division asks that TVA perform a survey for rare species along the proposed transmission line route. Should suitable habitat exist in areas proposed for disturbance, the Division asks that TVA provide protective consideration for rare species. Based on the US Geological Survey topographic map, the proposed transmission line appears to cross sinkholes. Because of this and because caves with the federally endangered gray bat and state deemed-in-need-of-management eastern woodrat populations have been observed within four miles, the Division asks that TVA pay particular attention to potential impacts to karst habitats.

For the fauna listed above, the Division asks that this project be coordinated with the Tennessee Wildlife Resources Agency (Rob Todd, TWRA, <a href="mailto:rob.todd@state.tn.us">rob.todd@state.tn.us</a>). For the gray bat, TVA should coordinate protective planning efforts with the US Fish and Wildlife Service.

Also, for additional information regarding Tennessee's rare and endangered species or interpretation of Status or Ranks, please visit our website at <a href="http://state.tn.us/environment/na/">http://state.tn.us/environment/na/</a>. Thank you for considering Tennessee's rare species during the planning for this project. Should you have any questions, please do not hesitate to contact me at (615) 532-0440.

Sincerely,

Silas Mathes Data Manager

**Hugh Mills** 

Cookeville, Tennessee

Silas Mathes

Comment:

"I dislike the "preferred" route simply on aesthetic considerations. I would prefer to see the powerline in a location already impacted by human artifacts, rather than see a relatively pristine area become blighted by this addition. I realize that such a route may cost more, but preserving the beauty of the natural landscape is worth the extra cost."

#### Steve/Diane Moore

#### Comment:

Page 1 of 2

## Diane Moore - STEVE'S WIFE

From: "Diane Moore" <dianemoore@frontiernet.net>

<ucdailynews@yahoo.com> To: Cc: <ifwilliamson@tva.gov>

Sent:

Wednesday, December 19, 2007 5:50 PM MOORE TO THE POINT - STEVE MOORE - 2 XWEEK OALINE COL. M&TH Subject:

PLEASE POST 12-20-2007

WEB SME: UCDAILY NEWS, com

#### A PILE DRIVER OVER EVERYONE'S HEAD

These pesky dirt people would have Algood go dark all for their self-centeredness. They are miserable and want everyone to be the same. They don't care one bit that Algood is growing at a rapid pace. It's the fastest growing municipality in Putnam County, and it's one of the fastest growing places in the Upper Cumberland. It would stand to reason and should be recognized by reasonable people that with growth comes the demand for more electric power. These NIMBYs will no doubt take TVA to court in an attempt to stop them from crossing their land. Costs like this affect everyone's rates. Algood must have adequate power for the present and for the long term.

As Ronald Reagan said on the old GE Theater which he hosted some 50 years ago: "Progress is our most important product."

These environmentalists would have us riding horses, streets with manure in the dirt, and pushing wheelbarrows if they had their way. They can't win at the ballot box, so they try to use the courts to impose their policies on the rest of us who make up the majority. Unfortunately, their actions mirror a trend today that a small but vocal minority employs. When they can't gain traction, they whine, lawyer-up, and shop for a liberal judge who will rule in their favor. And, they are prepared and bank rolled sufficiently to carry their demands through appeal after appeal at the State and Federal court levels. They have no concerns for the people who their actions

Let's face it -- somebody's land will be affected. The last time I looked the technology for sending electric power through thin air has yet to be developed. And, the cost to bury the transmission lines is prohibitive.

So, what do these NIMBY environmentalists expect? Why not just let Algood go dark or brown as demand outpaces supply. Can anybody imagine letting Algood experience a loss of power because TVA failed to plan for the fact that more electricity would be needed? Yeah, those environmentalists would. These powerline opponents are a perfect example of how a fringe element is empowered by the Environmental Protection Agency. This governmental entity is an out-of-control bureaucracy that NIMBYs use as a pile driver over the head of progress. This agency has almost singlehandedly sounded the death knell for needed projects nationwide, and the silent majority has suffered because of its ham-handed ways. This agency is exactly the one that has allowed these NIMBYs to gain any possible traction.

This nation was far better off before the advent of the EPA. Countless billions have been spent fighting their smothering excesses. They are a bane to progress in this country. Think not? Look at what's happening to the new Algood transmission line. Look at the effects of the outages in Oklahoma, Kansas, and Missouri in the past couple of weeks because of the ice storm, and the group that opposes the Algood transmission line says with straight faces that they can find no proof that the line is needed. Look at the delays in the completion of 840 through Williamson County. I ask again: Do they want Algood to go dark?

#### EXTRA, EXTRA, EXTRA

On Monday, Congress approved funding a loan program to guarantee 80% of nuclear power plant construction. It's part of the 2008 Omnibus Appropriations Bill.

12/19/2007

#### **Vincent Neary**

Cookeville, Tennessee Comment:

"If you cannot make the data justifying this project available to the public you should not build it. The project unnecessarily causes environmental damages that could be avoided by routing the transmission lines along Highway 111. An honest analysis of cost-benefits, would probably kill this project."

#### Danny L. Newton

Cookeville, Tennessee

#### Comment:

"This project calls into guestion the judgment of TVA. The alleged reason for not releasing the engineering report is not good enough. I don't see any reason to even begin a project like this with an agreement limiting public disclosure. The EIS probably used some facts that the engineers failed to gather because they are not part of the inner circle of those knowing what the Chamber of Commerce is doing from time to time. TOUR has taken a keen interest in this project because of the similarities between the Fifth Interchange and this TVA power line. In both cases, there is uncalled for exuberance and hyperventilation caused by the Chamber of Commerce. There seems to be overblown or artificially inflated demand that must be met under what seems to be an emergency situation. A highly technical subject has been dressed up in an economic development fabric that makes nearly everyone think that they can master the subject with a minimum of study and a maximum of cliché thinking. Anyone who objects or questions the need for this line is automatically dismissed as a The Fifth Interchange is an attempt to provide an over supply of NIMBY. exits from the Interstate 40 at a cost that can not be recovered from the means that we have to recover costs except income transfers from other parts of the state. The partially purchased 400 acre industrial park/business park is an attempt to provide an over supply of commercial property in a county that already receives a very high fraction of income from industrial and residential development. Only seven other counties in Tennessee have higher percentages of industrial and commercial tax receipts from industrial and commercial property. This data is easily found on the Internet. The counties are: Hamblen, Montgomery, Madison, Shelby, Sevier, Davidson and Hamilton. The only thing missing in the future 400 acre Mine Lick Creek Business Park is another over supply of road and utility infrastructure to attract some kind of The TVA power line may also be an attempt to oversupply the Algood area with electrical capacity by inflating the need. I suspect that the original engineering report did not have anything in it about the apartment houses, the school, the bank, the three future industries etc. which was mentioned on Adobe page 11 of the report. Another commonality of these three projects is that the cost of the oversupply is communized or shifted to the public at large. The mistakes that TDOT makes when providing an oversupply of asphalt or asphalt in the wrong place is passed to the traveler through the many transportation means, mostly gas taxes, that the legislature provides to fund TDOT. The business park mistake will be passed to the city of Cookeville and to Putnam County as higher taxes and lost property tax revenue. If TVA is moving precipitously into this power line project, those costs will also be passed to the

local UCEMC and then to the people with electric meters on their houses. I don't know what industry they were talking about in the report. There are at least three parcels of land along SR111 totaling 88 acres that are for sale as industrial properties but there are no major empty buildings to be served in the area of Algood. There are currently at least <A

HREF="http://www.tennesseeprospector.com/ed.asp?cmd=findsites&maxx=324 5301.69933914&minx=678372.283830362&miny=-

205039.900486618&maxy=1304918.57922443&vis=&nvis=&p=1&t=1&x1=&y1= &label=&selid=&s=&k=0&rida=&thetype=all&minsize=&maxsize=&units=SqFt&r ailroad=&minceiling=&geotype=county&zipcode=&county=47141&Submit=Sear ch">17 empty buildings </A>in Putnam County ready for the next call center, warehouse or factory. The TVA EIS report does not mention the recent 400 acre business park that is under development on the west side of Cookeville. Since this property is already within the city limits, it is probably going to be served from the Cookeville East substation. Adding capacity to Algood gives additional capacity to the East Cookeville substation and thus to the City of Cookeville to serve this future industrial park on Mine Lick Creek Road on I-40. This additional capacity also allows the city to expand its borders without challenge to its capacity to serve the willing and unwilling residents by incorporation. By expanding the availability of industrial property in the county, they have lowered the probability that the new industry, real or imagined, would end up in Algood. Do not hold your breath for the three industrial buildings that are claimed in the report. Tennessee lost over <A

HREF="http://www.knoxnews.com/news/2006/Nov/20/business-journalbriefs/">15,000 industrial jobs </A> since 2002. The rate of industrial jobs lost due to productivity is approximately 2.29% per year every year in spite of all of the efforts of the State Economic and Community Development plus local efforts. Over 13% of those 15,000 jobs lost were losses in Putnam County. Manufacturing jobs in Cookeville declined 18.1% and 13.9% in Putnam County from 2000 to 2004. Many people are victims of Chamber of Commerce hyperventilation about jobs, jobs, jobs but TVA can not pretend to be unaware of the realities in this case. They have years of data that could be easily put in a table showing the historic electrical consumption from that particular sub station. Instead, they decided to tell everyone that there was going to be a 30% increase in demand in the next three to five years. From here on out, we are on our own to imagine the missing details. A perpetual increase of 30% over 5 years would work out to an annual increase of about 5.38% per year. The new capacity of 33MVA would be exceeded in 10.86 years. I seriously doubt that TVA or anyone else would rebuild a substation with a service life of less than 11 years. Let's say that the miracle development boom is going to be over in five years and there is no sub prime morgage crisis ever or looming. The Algood station would be producing 24.27 MVA or about 75% of its capacity. If the remaining capacity was spread out over 25 years, then the average increase per year would be 1.2 percent per year. This would place the next capacity crisis 30 years down the road. As long as no one invents an economical electric car with a 300 mile driving range or an aluminum plant does not come to town, the 1.2% increase in consumption per year will be above the probable increase in population or per capita consumption. According to data provided on the state Economic and Community Development web site, the population projections from 2006 to 2011 anticipate an increase in Putnam County population of that would cause it to double every 56.78 years. A 1.2%

per year increase per year in electrical demand would double demand every 35 years. If electrical demand follows per capita population, there is no crisis with or without the imaginary and suddenly mysteriously appearing economic It is very difficult to escape the conclusion that this "crisis" development. real or not, should have been seen sooner if it is as dire as presented. If, in fact, there are transformers in the system with a name plate date of maufacture going back to 1968, this is a strong and convincing suggestion that the area is due for an upgrade if not now then soon. A justification for this project based upon a 2002 study probably would have included a stagnant rate of increase in electrical demand for industrial enterprises, especially if the data included the recession of 2001. Even though this new power line is a logical step for both reasonable and possibly unreasonable future growth, TVA should no longer be given future respect or the benefit of a doubt because of their failure to release supporting documents. TVA should not be using short term speculative promises from the Chamber of Commerce to justify infrastructure management decisions. Secrecy does not foster public trust and takes a long time to regain once lost. It seems that TVA is working for the UCEMC and the Chamber of Commerce a lot harder than the citizens of Putnam County."

#### Valerie Ohle

Commissioner, Tennessee Commission on Indian Affairs Comment:

"Thank you for returning my call. Today is Monday, January 14, 2008.

As I explained on the phone earlier today, a constituent has reported to me that there are intact American Indian burials in the route of the proposed Algood Power Supply Upgrade. This e-mail is to serve as notice of the reported burials before the end of the comment period.

I am requesting a copy of the Hockersmith 2007 archeological survey for this project, and a copy of the documentation showing compliance with Section 106 through notification of federally recognized American Indian nations and consultation with representatives of federally recognized American Indian nations.

My fax number and e-mail are below. I appreciate your assistance in this matter.

Sincerely, Valerie Ohle, Commissioner TN Commission on Indian Affairs"

#### **Edith Phipps**

Cookeville, Tennessee Comment:

"We would like to thank you and the staff of TVA for the work and study put into the new TVA Line for Algood.

I know TVA can not please every one with the choice that has been made.

Trees can be replaced, and I think

Less homes will effected on the route chosen.

Edith Phipps"

#### Fred Ray

Cookeville, Tennessee

Comment:

"Yes...I have reviewed your proposals. I personally do not have any property that would be affected by the proposed transmission; however, I do have friends whose property may be affected. I know the Putnam County region is growing, but I would like to see a less environmentally damaging route proposed. Please consider a route west from Tap 1 to SR 111, north on SR 111 to Main St. 10 th St. exit and east on Main St. to the currently being built substation. I know this may not be the shortest route, but will be the least costly in terms of aesthetic views destroyed, property values decreased, and lives disrupted. SR 111 is a natural corridor to build this line. Going east on Main St. to First Avenue then South to the sub station is also natural. Please consider this route. I have friends whos farms will be damaged aesthetically if this line is built with the current alternatives. There is a less damaging route and this is the SR 111 route. Thank you.

#### Michael Richardson

Cookeville, Tennessee Comment:

"I am concerned about the lack of consideration for building this project along existing right of way, specifically along SR 111. If existing right of way is technically suitable for the expansion project it should be given first priority, rather than creating an entirely new right of way that disrupts and negatively impacts properties along the 5.2 mile corridor proposed by TVA. While necessary for our quality of life, there is no question that power transmission lines are a visual blight on the landscape. Therefore, their impact on the land should be reduced whenever possible. Constructing new power lines along existing routes minimizes the overall visual effect of the new lines, since other transmission lines already exist. And, using an existing route allows property owners along the proposed new route to maintain their quality of life and the value of their property. Cost of construction should never be the only factor that TVA considers when constructing new lines. The long-term economic effect on TVA is negligible compared to the the considerable short and long term economic effects on the affected property owners. Sincerely, Michael Richardson"

#### Kate Scurlock

Cookeville, Tennessee

Comment:

"I would like to voice my concern and opposition to the proposed transmission line that will run over Buck Mountain. Not only will this destroy yards and private property but huge, ancient trees and wildlife habitat that is becoming more scarce every day. Can't we, the citizens of this area be informed of the alternatives to this route? Please, please reconsider this plan. Kate Scurlock"

**Don Shockley** 

Cookeville, Tennessee

Comment:

"From my location the present route is ok with me."

#### Sullivan Smith MD

Cookeville, Tennessee Comment:

"I wish to thank you in advance for your time and attention to my comments. In particular, the attorney representing my wife and I in this matter proposed an alternate solution to this project. His proposal was developed after extensive meetings, site visits, and consultations. I should mention that it also came at a considerable cost to my family. That solution would have saved significant funds (estimated to be more than \$3 million) for TVA in terms of property acquisition costs. In addition, it would have provided a back up power source for Algood (as well as Cookeville) should the line fail. This has happened at least once in the past after a pole was struck by a car. In this alternate proposal, the property, environmental, and personal impact created by the existing route all but goes While it may seem unlikely that an attorney could propose a meaningful alternate solution to address whatever issues are driving this new power project, I should tell you that he is a former TVA counsel who has worked on many similar projects. Our attorney, Mr. Herb Sanger, made his proposal personally to TVA staff members during a meeting in Chattanooga. I do not believe that his alternate proposal was given fair and equal consideration compared to the current route and project. My specific request is for you to reconsider his suggestions and then specifically address the reasons why TVA chose to continue on with the project as proposed. Once again, thank you for your consideration in this matter. Respectfully, Sullivan Smith, MD"

#### **Scotty Sorrells**

Tennessee Department of Environment and Conservation Water Supply Nashville, Tennessee Comment:



# STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

WATER SUPPLY
9th Floor, 401 Church Street
Nashville, Tennessee 37243-1549
Phone: (615) 532-0191; Fax: (615) 532-0503

January 14, 2008

James F. Williamson, Jr. Tennessee Valley Authority 400 West Summit Hill Drive WT 11D Knoxville, Tennessee 37901

RE: Draft Environmental Assessment Proposed power Supply Upgrade Algood 161-KV Transmission Line, Putnam County Tennessee

Mr. Forbes:

The Division of Water Supply has received and reviewed the request for a Draft Environmental Assessment Proposed power Supply Upgrade Algood 161-KV Transmission Line, Putnam County Tennessee and would like to thank TVA for the opportunity to comment on this plan.

#### Safe Dams Program:

A file review was conducted of all registered sites in the Safe dam program. There are no registered dams located within the proposed project area. The contact for information in the Safe Dams Program can be obtained from Mr. Lyle Bentley Manger of the Safe Dams Section in the Division of Water Supply. Mr. Bentley may be reached by e-mail lyle.bentley@state.tn.us reached at (615) 532-0154.

#### Source Water Protection Program:

A review of the community and non-community water supplies in the area shows the proposed project not located within any community water supplies. A Noncommunity water system Hidden Hollow Camp is located close to the proposed project area (see attached map). Any information on the Source Water/Wellhead Protection areas can be directed to Mr. Scotty D. Sorrells Manager Groundwater Management Section. Mr. Sorrells may be reached by e-mail <a href="mailto:scotty.sorrells@state.tn.us">scotty.sorrells@state.tn.us</a> or by telephone at (615) 532-9224.

#### Sorrells - page 2

Mr. Williamson

Draft Environmental Assessment Proposed power Supply Upgrade Algood 161-KV Transmission Line, Putnam County Tennessee January 14, 2008

Page 2

#### Water Well Program:

A file review was conducted of all the registered private water wells within this proposed route. Please contact Mr. Luke Ewing with the names of the topographic quads. There are private water supplies in the proposed area. Please be advised that not all the water wells that are in existence are on this database and that there may be older wells that we have no record of as well as hand dug wells whose existence we would not have recorded. All water wells that are encountered should be plugged and abandoned by a licensed well contractor. Any information related to the Water Well Program can be directed to Mr. Luke Ewing Manager Water Well Program. Mr. Ewing can be reached by e-mail <a href="mailto:luke.ewing@state.tn.us">luke.ewing@state.tn.us</a> or by telephone at (615) 532-0176. All of the wells drilled for testing and or production will need to be registered with the water well program and appropriately tagged and recorded.

#### Underground Injection Control:

A file review was conducted of all the registered Underground injection Control (UIC) points within the area of review. No registered UIC sites are within the proposed routs. Please be advised that not all old large capacity septic systems or stormwater injection points that are in existence are on this database. All UIC wells that are encountered should be plugged and abandoned according to approval from the UIC program. Also please be advised that the area has the potential for karst activity. Any sinkhole that is encountered should be registered with the UIC program and shall be permitted before any disturbance to the area. Any information on the UIC programs can be directed to Ms. Carolyn Sullivan UIC program Groundwater Management Section. Ms. Sullivan may be reached by e-mail <a href="mailto:carolyn.sullivan@state.tn.us">carolyn.sullivan@state.tn.us</a> or by telephone at (615) 532-0180.

This letter represents a brief review off best available data sources and not a comprehensive field evaluation. Please verify all information contained within this letter in the field.

365

## Sorrells - page 3

Mr. Williamson
Draft Environmental Assessment Proposed power Supply Upgrade Algood 161-KV Transmission
Line, Putnam County Tennessee January 14, 2008
January 14, 2008
Page3

The issuance of this letter does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, State, or local laws or regulations.

If you have any questions, feel free to call me at (615) 532-9224 or email at scotty, sorrells@state.tn.us.

Sincerely,

Scotty D. Sorrells

Manager Ground Water Management Section

Source Water Protection Coordinator

Division of Water Supply

c: Thomas A. Moss Deputy Director DWS

Lyle Bentley Chief SDP Luke Ewing Manager WWP Carolyn Sullivan UIC

Wellhead Protection Area Non-Community Water System Intons Cmmunity Water System Safe Dam Program Private Water Wells TN Counties Power Supply Upgrade Algood 161-KV Transmission Line Aera of Intrest Putnam County 0.5 0.25 0 1.5 ■Miles

#### **Barry Stein**

Cookeville, Tennessee

Comment:

#### Comments on TVA Draft EA For Algood Transmission Line (2007-12)

Submitted by Dr. Barry Stein, 4299 Buck Mountain Road

#### Introduction

The draft EA submitted for review by TVA is based on outdated and erroneous projections of power needs in the Algood area. These projections are based on exaggerated and unsubstantiated claims of industry relocations to the area and housing growth. Changes in the U.S. economic picture for financing new construction have obviously affected growth in the housing sector. There is no evidence of any new industries moving into the area that would correspond to an 8 megawatt increase in peak power demand at the Algood substation. Energy projections have also failed to take into account new conservation measures and the loss of over 1200 customers to annexations by the City of Cookeville – many of whom are served by the Algood substation. The need for a need transmission line ROW is just not supported by any publicly disclosed information.

If as TVA representatives now suggest, the real justification for the new transmission line is to relieve load on the West Cookeville substation, then the planning process needs to begin anew so that viable options can be considered that factor in the changing needs of power distribution in the area as they are impacted by existing and future annexations of customers in the UCEMC service area surrounding Cookeville. Cookeville Electric has requested upgrades to its power supply infrastructure from TVA that would if implemented alleviate the problem at the West Cookeville substation and make a new transmission line to the Algood substation unnecessary (see supporting materials #2). Furthermore, current annexations of customers by Cookeville Electric will greatly reduce the load at the Algood Substation and make it unnecessary to increase the capacity of that substation. TVA's plan to reduce the load on the West Cookeville substation by separating it from the Algood substation will not have the desired effect. Many of the current customers served by the Algood substation will be migrating to other substations operated by Cookeville Electric once annexations are complete. Some of these Cookeville Electric substations will still be drawing power from the West Cookeville substation and will force TVA to revisit the overloading of the West Cookeville substation in the very near future.

Building a new 161 KV transmission line to the Algood substation would not be in the best interests of serving the power needs of the Cookeville area with the greatest growth and would instead bring more power to an area with declining demand as additional annexations occur. TVA should instead improve the infrastructure serving Cookeville Electric within the city limits and take the load off of the West Cookeville substation. Plans to achieve these goals have already been submitted to TVA by Cookeville Electric (see supporting materials #2). TVA needs to reexamine the power distribution needs of this area and develop a plan that truly accommodates growth in services in an effective way with minimal environmental impact.

The analysis of environmental damage caused by the construction of the proposed transmission line across Buck Mountain is grossly underestimated. In fact, the criteria used by TVA to rank environmental and cultural impact are at best arbitrary and capricious. Specifically, those criteria assign little or no value to the destruction of over 12,000 trees in the ROW which is

1 of 7

#### Stein – page 2

two to three times the magnitude of other available routes. The TVA criteria for route selection also assigns little or no value to significant Native American archeological and cultural evidence in the area. As such, it seems that this project and all other TVA construction projects should be halted until full NEPA environmental impact studies have been completed or until criteria for route selection are developed and applied that are not arbitrary and capricious and that recognize the true environmental value of trees and Native American culture.

The TVA environmental assessment raises numerous concerns about impacts that either casually dismissed without serious consideration or admittedly subjected to less than adequate investigation. For example, the report dismisses the impact of destroying over 12,000 trees as having any serious environmental impact because there are plenty of other trees in the area. Policies like this have contributed to the destruction of large areas of the Amazon forest and are now associated with significant contribution to global warming. Insufficient study of the affected area has been undertaken to evaluate the impact on threatened and endangered species. Many of these species were either not studied at the appropriate time of year or the most likely areas of habitation were not fully explored.

Federal NEPA guidelines state that a full NEPA environmental impact study/statement is required when a project is controversial. A recent article in the Cookeville Herald-Citizen supports the controversial nature of this project by identifying it as "A Top News Story of the Year" (Engel, December 24, 2007). Numerous articles and letters have been published about the controversial nature of the project including; citizens' objections to the project, the refusal by TVA and UCEMC to disclose documents supporting need, the lack of substantiating evidence for projected growth in new industries and housing and the denial of such growth by city officials and the chamber commerce, and the extensive environmental damage that would be caused by the transmission line.

Taken together these issues require a complete reanalysis of the power needs in this area and a full NEPA environmental impact study/statement.

#### Analysis of Need

- The need for this project is based on an outdated and now erroneous report that projects an 8 megawatt increase in peak power demand for the Algood Substation. This projection was based on the following assumptions which have turned out to be false:
  - a. 3 large industries relocating to the Algood area. For comparison the magnitude of these industries would exceed the entire electrical consumption of the Tennessee Technological University campus by 2 megawatts.
  - A large 400 unit apartment complex would be built in Algood.
  - Hundreds of new homes would be constructed in the Algood area.
- No conservation measures were either included in the projections or considered.
- No consideration was given to the loss of over 1200 customers through annexation to Cookeville Electric.
- No consideration was given to the loss of additional customers through future annexations that are part of the Cookeville urban expansion plan approved by the State of Tennessee and that would reduce power demand at the Algood substation.

2 of 7

369

#### Stein - page 3

No consideration was given to the use of distributed power generation in the area despite the fact that this a recognized solution to problems of peak power demand by the U.S. Department of Energy and other utility companies across the nation.

The projections for growth of industrial customers and residential customers in the Algood substation area were overly optimistic. There is no evidence that there is any likelihood of these projections being realized now or in the foreseeable future and current economic conditions in the U.S. financial markets portend even slower growth in residential and commercial construction. No effort was made to factor in conservation activities in the initial projections for energy demand, although such activities are now projected by the conservation division of TVA to save between 10 and 15% of energy consumption. The loss of customers by UCEMC to Cookeville Electric through annexation was also never factored in to the projections for energy demand despite the fact that these annexations had announced before plans for the new transmission line were announced. Although we have been continually denied access to documents that would allow our energy experts to precisely calculate demand, we suspect that with the loss of annexed customers, demand for electricity at the Algood substation would at best remain relatively unchanged and will most likely decline.

#### Comments on Environmental Impact

As stated in section 4.15 of the Draft EA.

Construction and operation of the proposed transmission line has the potential to cause unavoidable adverse effects to several environmental resources. These adverse effects could include the loss of forest area and associated wildlife populations; increased forest fragmentation; removal of the tree canopy at stream crossings; restrictions on future land use within the right-of-way; and changes to the visual character within the local area.

Cerulean warblers are one such species that would be affected by this transmission line. As stated in 3.31 of the Draft EA:

Although cerulean warblers were not observed during field inspections of the proposed transmission line or the existing transmission line to be sold, numerous records exist for Putnam County. Cerulean warblers occur largely in unfragmented, mature deciduous forests, particularly along floodplains or other mesic areas. The mature forests found along the proposed new transmission line route provide habitat for this species, specifically, the one mile of dry ridgetops and moist coves east of the proposed substation site.

The environmental assessment conducted by TVA was woefully inadequate because cerulean warblers would not normally be observed outside of the month of May in this area (see supporting materials #4.

The survey of endangered and threatened bats also suggests that the numerous caves in the area provide a likely habitat. Indeed, appropriate observations were not conducted at the correct times of the year in the caves to evaluate the areas contribution to endangered or threatened bat species.

Indiana bats were not expected at this time of year, and no Indiana bats were caught at either survey. (p 32)

Rafinesque's big-eared bats occur in the forested regions of the South and roost in

3 of 7

#### Stein – page 4

buildings, attics, hollow trees, mines, and caves (Linzey 1998). An individual of this species was captured at a cave 210 feet from the proposed new transmission line route on August 13, 2007. Other caves in the vicinity also provide suitable habitat for this species. (3.31)

Numerous other caves occur closer to the proposed new transmission line route and offer potential gray but roosting habitat, although gray buts have not been recorded from them. Three of the four closest caves, located between 150 and 210 feet from the proposed route were surveyed for buts.

These caves including Red Rag cave (the most likely to host grey bats) were only observed during one day in June and could serve as hibernation habitats for endangered grey bats at other times of the year when they were not surveyed.

- No mention is made of efforts to investigate the presence of the endangered Carolina northern flying squirrel on Buck Mountain which residents have reported seeing on their property. This requires further study.
- 4. Groundwater and Geology. The proposed transmission line travels through a large area that is covered with Karst features including many sinkholes and caves. This area supplies ground water to the Falling Water river basin and the residences in the Poplar Grove Community and Rockwell Holler below Buck Mountain. Many of these residences do not have access to city water and rely on springs or wells for drinking water. Contamination of these drinking water supplies is almost certain during construction of the transmission line and during herbicide application to maintain the ROW. As noted in section 3.5:

Karst systems are readily susceptible to contamination as the waters can travel long distances through conduits with no chance for natural filtering processes of soil or bacterial action to diminish the contamination. "Mature" or well-developed karst is particularly susceptible to contamination, and some learst in the project area is considered mature. In unconfined or poorly confined conditions, karst aquifers have very high flow and contaminant transport rates under rapid recharge conditions such as storm events (TDEC 2002a).

Residential wells may occur near the project area.

Contrary to what is implied in the EA, access roads will have to be constructed through extensive areas of Karst topography in order to construct and maintain towers.

There are several wetlands in the right of way and there are insufficient plans to deal with these areas which have been known to host Heron.

Two wetlands were identified within the proposed right-of-way (see Table 7). The proposed right-of-way would cross a 0.46-acre portion of a forested wetland (W001B) near the Algood Substation. W001B is located along an intermittent stream that flows into a sinkhole just outside the proposed right-of-way. W001B exhibits hydric soils. W001B is dominated by hydrophytic vegetation, including red maple, sweetgum, green ash, and Nepalese browntop. W001B was rated as a Category 2 wetland using TVARAM. This wetland exhibits moderate wetland condition and provides moderate wetland functions. (3.71)

About 50 percent of the ROW is through mature forest areas and about 32 acres of
mature trees will be destroyed. These trees are located near interstate (I-40) and two
cities (Cookeville and Algood). According to the U.S. Department of Forestry and other
sources (USDA Forest Service Pamphlet #R1-92-100; Alexander, 2008; Novak, 2005,

4 of 7

#### Stein - page 5

2006, 2007) mature trees will have the following environmental economic benefits over a fifty year life span:

| \$31,250 | worth of oxygen                |  |
|----------|--------------------------------|--|
| \$62,000 | worth of air pollution control |  |
| \$37,500 | worth of recycled water        |  |
| \$31,250 | worth of soil erosion control  |  |

#### \$162,000 of environmental benefits per tree

At an average density of about 400 trees per acre (e.g. Raile and Leatherberry, 1988), over 12,000 trees will be destroyed with an environmental value of over \$2 billion. The magnitude of this environmental damage should necessitate a full NEPA environmental impact study. Furthermore, over 50% of the weight of trees is carbon (Nowak, 1994) and hence trees play an extremely important role in carbon sequestration and in controlling CO2 and global warming. Given the crucial role that trees are acknowledged to play in reducing global warming, we find it astonishing that an agency that is one of the worst producers of greenhouse gases would consider destroying such a large quantity of trees that are known to have such a large positive environmental impact. Furthermore, since transmission ROWs generally persist for more than 50 years the \$2 billion estimate of environmental damage may actually underestimate the damage from this transmission line. If we factor in a 100 year effect we would need to double the estimate to \$4 billion, however, this estimate would still be too conservative because it does not take into consideration the effects of inflation into the estimate of value.

- 7. Over 30% of the ROW will be cut through forested mountain with slopes of more than 20% 30% where erosion will be significant. These steep slopes are also located in areas where there are numerous Karst features and where erosion will contribute to the degradation of ground water supplies for residences in the valley that obtain their drinking water from wells or springs because city water is not available. The impact of this project on drinking water sources in the Rockwell Hollar is totally overlooked in the report. At a minimum, TVA should be required to install city water to any residences that feel their water quality is affected by the project.
- 8. Despite the fact that we provided considerable documentation of artifacts recovered in around the proposed transmission line and expert letters about the presence of extensive Native American habitation in this area from historic to prehistoric times (8000 B.C. to 3000 B.C.) in our previously submitted comments (see Buck Mountain Community Organization Report Opposing Proposed TVA/UCEMC High Voltage Power Line Across Buck Mountain Prepared March 5, 2007) little or no mention is made of any efforts to investigate these types of cultural artifacts or investigate the presence of Native American Habitation, burial grounds, or burial caves in the area. The presence of these artifacts and the cultural significance of this area for historic and prehistoric Native American habitation has been acknowledged in other TVA publications. The evidence already uncovered should warrant a full NEPA environmental impact study. Furthermore, we were assured that there would be complete disclosure of the exact methods and findings associated with such investigations. The draft EA is quite vague

5 of 7

#### Stein – page 6

and arbitrarily dismissive of any archeological findings. TVA has also failed to consult with Native American groups about the evidence of Native American habitation in this area in violation of Federal section 106 regulations.

- 9. There is no mention in the EA of the historic horse and wagon road used for mail delivery (Hyder Mountain to Rockwell Holler) and documented in the Tennessean Magazine article (1947) enclosed in the previously submitted comments (see Buck Mountain Community Organization Report Opposing Proposed TVA/UCEMC High Voltage Power Line Across Buck Mountain Prepared March 5, 2007). This road would certainly qualify for inclusion in the historic register and would be grossly impacted by the proposed transmission line (see supporting materials #6).
- 10. The endangered plant species Least Trillium that is likely to be found near the proposed transmission line, would not have been visible during the month of September when a survey was conducted because of drought conditions during the summer and the fact that it is difficult to differentiate from other species of trillium when it is not flowering. This species needs to be surveyed during the Spring.

#### References

Alexander, K. 2008. "Benefits of Trees In Urban Areas," Colorado Tree Coalition, http://www.coloradotrees.org/benefits.htm

Coder, K. D., "Identified Benefits of Community Trees and Forests", University of Georgia, October, 1996.

Nowak, D.J., 1994, Atmospheric carbon dioxide reduction by Chicago's urban forest, in: Chicago's Urban Forest Ecosystem: Results of the Chicago Urban Forest Climate Project, (E.G. McPherson, D.J. Nowak, and R.A. Rowntree, eds.) Gen. Tech. Rep. NE-186, USDA Forest Service, Northeastern Forest Experiment Station, Radnor, PA, pp. 83-94.

Nowak, D. J.. 2005. Strategic tree planting as an EPA encouraged pollutant reduction strategy: how urban trees can obtain credit in state implementation plans. USDA Forest Service, Northeastern Forest Experiment Station

Nowak, D.J., D.E. Crane, and J.C. Stevens. 2006. Air pollution removal by urban trees and shrubs in the United States. Urban Forestry and Urban Greening 4:115–123.

Nowak, D. J., Hoehn, R. and Crane, D.E. 2007. Oxygen Production by Urban Trees in the United States. Arboriculture & Urban Forestry 33(3), p 220-226.

Raile, G.K. and Leatherberry, E.C., 1988, Illinois forest resource, Resour. Bull. NC-105, USDA Forest Service, North Central Forest Experiment Station

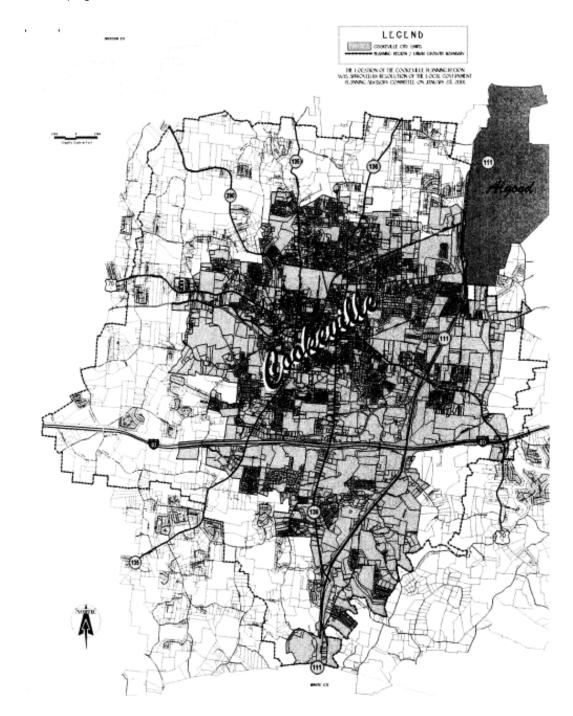
USDA Forest Service Pamphlet #R1-92-100

6 of 7

## Other supporting documentation

- State Approved Cookeville Urban Expansion Boundary.
- Cookeville Electric Proposal that would reduce load on TVA's West Cookeville substation.
- 3. Expert's letter about impact to Cerulean Warbler habitat.
- 4. Expert's letter about the best time to survey for Cerulean Warblers.
- 5. Sierra Club letter opposing the transmission line.
- Expert's letter about the historical value of the last horse and carriage mail delivery route in Tennessee that was not mentioned in the TVA EA.
- TVA Algood Transmission Line Top news story in 2007 Herald-Citizen Newspaper.
- 8. Related News Stories about project.

# Stein – page 8



KEQ \* 5



## COOKEVILLE ELECTRIC DEPARTMENT

55 West Davis Road Cookeville, TN 38506 Phone (931) 526-7411 Fax (931) 526-2835

September 24, 2007

Mr. Rockey D. Hall Tennessee Valley Authority 1101 Market Street Chattanooga, TN 37402-2801

Re: Cookeville Electric Department Proposed 13 kV Underbuild

TVA Monterey - Cookeville 69 kV Transmission Line

Structure Number 42 to 44

Dear Mr. Hall:

South Cookeville 161 kV Substation was completed in 2001 to serve the rapidly growing southern portion of the Cookeville Electric Department (CED) service area. While new load growth has been added to South Cookeville with the construction of two feeders, the ability to transfer load from the Cookeville District and East Cookeville 69/13 kV Substations has been limited by the availability of distribution line routes for additional 13 kV feeders. Line routes contemplated during substation planning and design were refused once construction began. Route discussions have continued for several years with no success.

The unavailability of additional distribution line routes has resulted in the load growth of the South Willow Avenue corridor and the Interstate Drive area to continue to be served from the Cookeville District and East Cookeville 69 kV Substations respectively - ultimately the West Cookeville 161/69 kV Primary Substation. Annexation by the City of Cookeville of property south of I-40 in the South Willow Ave corridor and Lee Seminary Road area for potential industrial park usage will continue to add load to Cookeville District 69 kV Substation unless new distribution circuits can be added to South Cookeville Substation.

To serve the anticipated loads of the annexed areas and transfer load from the 69 kV system, CED proposes to underbuild two (2) 13 kV distribution circuits on the TVA Monterey – Cookeville 69 kV Transmission Line. This underbuild would extend from Structure 42 to 44 as shown on the enclosed drawings.

With the proposed feeder circuits, we anticipate a transfer of approximately 8 to 9 MW (S. Willow Ave corridor) from Cookeville District and approximately 7 to 8 MW from East Cookeville to the South Cookeville Substation. In addition, we project up to 10 MW in the Lee Seminary Road industrial area to be served by South Cookeville instead of West Cookeville. Overall, up to 16 MW could be served by the 161 kV System instead of the 69 kV System of the West Cookeville Primary Substation.

## Stein - page 10

Enclosed is our design for the proposed underbuild circuits. The design will incorporate underground cable from the substation with risers located on Structures 42-1 and 42-2 and the 13 kV circuits on separate poles of Structures 43 and 43A.

We request the TVA review the possibility of the two underbuild circuits as shown on the enclosed drawing. Please contact the Cookeville Electric Department or our consultant, Allen & Hoshall, with any questions.

Sincerely,

seph A. Peek

Enclosure:

cc: Mike Green TVA

Tom Barnes Allen & Hoshall

2675 Lakeland Dr. Cookeville, TN 38505

6 February 2007

Dr. Barry Stein Buck Mountain Rd. Cookeville, TN

Dear Barry,

In response to your inquiry about the effects of running a power transmission line from I-40 to Algood via a corridor near Hidden Hollow (one of several alternatives being considered), let me offer a two remarks.

First, this alternative to solving the alleged need for a power line to Algood would undoubtedly cause the removal of more forested habitat than any of the other alternatives and would thus be the least preferred alternative from the standpoint of protecting wildlife habitat, as well as the forested viewsheds enjoyed by the local human residents.

Second, this alternative would certainly have the most negative effects on any populations of Cerulean Warblers inhabiting this area, as it would remove hundreds of acres of mature forest from use by this species (and by several dozen other species of woodland breeding birds that occur in this area).

The second of these remarks derives from my considerable field work with the birds of Putnam County. I have conducted surveys for birds in all areas of Putnam County since 1991, and I have found the forested escarpment between Algood and Monterey to harbor a rich and diverse array of breeding species, including the Cerulean Warbler. In The Birds of Putnam County, Tennessee (1st edition1993; 2nd edition 2006)—

http://iweb.tntech.edu/sstedman/PutnamCountyBirdsDustJacketFront.htm
--I especially note the importance of retaining as much habitat as possible on the escarpments of the county in order to maintain healthy populations of breeding birds in these areas.

Given the alternatives available for routing this power line corridor, I certainly recommend against the alternative that would route this corridor through the Hidden Hollow area.

Sincerely,

Stephen J. Stedman, Ph.D.

2675 Lakeland Dr. Cookeville, TN 38505

25 September 2007

Dr. Barry Stein Buck Mountain Rd. Cookeville, TN

Dear Barry,

In response to your inquiry about the best time during which to conduct surveys to detect the presence of Cerulean Warbler (*Dendroica cerulea*), let me offer the following recommendation, based on my having conducted many surveys for this warbler in Putnam County and in some neighboring counties since 1991. Results of these surveys are available at my website.#

As a result of my survey work with Cerulean Warblers, I would strongly recommend that such surveys be conducted during the period from mid-May to mid-June, with May 20-June 10 being the best time for obtaining reliable results about this species' presence or absence from a particular site. To some degree, the elevation of the site being surveyed should affect the timing of the period selected for surveying for Cerulean Warblers. Higher elevation sites (above 2500 feet) may be surveyed effectively late in the period of May 20-June 10, while lower elevation sites (below 1000 feet) should be surveyed early in that period. Sites in Putnam County located at an elevation between 1000 and 2500 feet, as is the case with the area around Hidden Hollow, need to be surveyed near the mid-point of the period from May 20-June 10, if at all possible.

Sincerely,

Stephen J. Stedman, Ph. D.

# http://iweb.tntech.edu/sstedman/WarblerCeruleanUCR.htm



March 15, 2007 Electronically - Hard Copy to Follow

Todd Moore TVA 1101 Market St., MR 4G Chattanooga, TN 37402-1801

Re: New Algood Transmission Lines & Substation Upgrade

Dear Mr. Moore:

Please accept these comments on behalf of the Upper Cumberland Group of the Sierra Club on the above project.

We are opposed to the addition of these new lines. We question the need for these new lines and the upgrade.

We are particularly concerned that the additional lines and substation capacity will have an adverse effect and cumulative indirect impact on global warming by encouraging more growth and electricity usage at a time when scientists globally are warning that we must sharply decrease our fossil fuels emissions in order to have a habitable planet for our children and grandchildren. We ask that the enclosed copy of the recently released Interplanetary Panel on Climate Change report be included in the record for NEPA review for this project.

We urge TVA and UCEMC to develop with their customers energy conservation programs, rather than this support of additional fossil fuel use.

We believe there are significant impacts to the environment from this project and that a full environmental impact statement should be done. There are significant environmental resources in the area. This is a controversial project, with much public opposition. This is not a minor project, nor are its impacts minor.

We are concerned that the routes for the new lines traverse either large areas of contiguous mixed

### Stein - page 14

hardwood forest, with many sinkholes and caves holding native American artifacts and possibly a globally rare species of cave flatworm- or that an alternative route impacts on a significant wetland. Both major alternative route appear to cross historic properties,

We understand that a request for an extension of the comment deadline has been made pending receipt of a report from a consultant with UCEMC/TVA's justification of the need for this upgrade/project. We join in the request for an extension and ask that TVA make public the report. We also request a copy of the report.

Sincerely

Alexy 71/11 Jatter

Mary M. Mastin

Conservation Chair, Upper Cumberland Group Sierra Club

PADDOCK & MASTIN Attorneys at Law 360 Roberts Hollow LN. Cookeville, TN. 38501 931-268-2938 (Phone & Fax)

### Stein – page 15

11 January 2007

Mr. James F. Williamson, Jr. Tennessee Valley Authority 400 West Summit Hill Drive Knoxville, TN 37902

Dear Mr. Williamson:

I am writing this letter at the request of the Buck Mountain Community Organization. As historic preservation planner for the Upper Cumberland Development District in Cookeville, it is my professional opinion, that the old Horse and Carriage Route, or Mail Route, on Brotherton Mountain in Putnam County is eligible for listing in the National Register of Historic Places due to its historical and cultural significance to the early settlement of the Upper Cumberland region. The route also has significance as an Indian trail leading to habitation areas in the vicinity of the Falling Water River. A considerable amount of artifactual material has been found in the immediate area.

This route falls within the footprint of the proposed TVA transmission line project for the Algood substation. Based on current data, this project would have a detrimental effect on the cultural resources of the area in question.

Respectfully,

Randal D. Williams Historic Preservation Planner Upper Cumberland Development District

RW/rdw



Corement 29, 2007 Cocrewing in marking

## Herald-Citizen





become part of public records.

And their outspokenness regarding the issue has brought them to the forefront of the battle with TVA and Upper Cumberland Electric

Membership Cooperative, making the proposed transmission line one of the Herald-Citizen's top stories of 2007.

How it all began

Flash back to February, and it's really no surprise the fight TVA has received from local residents, many who have been skeptical about the need for the line from the get-go.

More than 230 letters were sent to TVA officials during a comment period as residents got their first – and only chance – to discuss the project first-hand with TVA officials. Those officials were able to show residents maps of the 18 different routes for the line and explained the projects need – without the update an Upper Cumberland Membership Cooperative substation would be overloaded, causing power outages in town by summer 2008.

And although little information about the project had been released by TVA, Stein, who spearheaded a group called the Buck Mountain

Community Organization, attended that meeting with packets of information in hand, ready to urge TVA against the project.

"if someone tells me there's only one way to solve a problem, that automatically raises a red flag," Stein said then. "I understand the TVA guys are just doing their job. They've always done business in a certain way and don't think in ways that would support other approaches that would reduce the need for electricity."

Complicating matters, UCEMC refused to release the report proving need for the line, calling it confidential and saying its public release would compromise private corporate information.

\*There is a side of me that says, who is it who thinks they need this information?" UCEMC General Manager Carl Brandt told the Herald-Citizen http://www.herald-citizen.com/index.cfm?event=news.view8id=0CB9842B-19B9-E2E2-673A721931F33985 (2 of 5) [12/29/2007 12:03:31 PM]



#### Herald-Citizen Online Edition - Cookeville, TN

in March. "What is their expertise? Just because they're a professor over at Tennessee Tech doesn't make them an expert at everything."

Portions of that report were eventually released by UCEMC to the TVA in September, and information later appeared on the TVA project Web site

-- claiming three new industries, a bank and a 400-unit apartment complex were part of the growth expected in Algood over the next several

years

But when Isbell checked with several officials, he found that no one had heard of those proposals.

"I've checked with every public official I can find, and nobody knows about three new industries coming in anywhere," Isbell said. "I don't know

where they're getting their information, so we're still questioning that."

But TVA's Allen Moore defended UCEMC, saying often it's not unusual for a utility companies to know about these things before anyone else.

'They are sort of out in front of big power demanding developments, so that's common,' Miller said. "Companies that are interested in a location,

they need to know that (power) can be supplied.\*

Preferred route chosen

It took several months, but the TVA picked its proposed route in late April, and as both Stein and Isbell had anticipated, the transmission line was

set to go right through their property.

Weeks later the pair was heading up an effort to collect funds for a lawsuit.

"Nobody could believe they selected this route," Isbell said. "We think they went out of their way to put it up here. There is some rugged terrain up

here, and they're going to go through and destroy everything."

http://www.herald-citizen.com/index.cfm?event=news.view&id=0CB9842B-19B9-E2E2-673A721931F339B5 (3 of 5) [12/29/2007 12:03:31 PM]

Stein – page 19

chosen, officials said, because it affected the fewest property owners and avoided area wetlands and Booger Swamp. But it was also the most expensive route and impacted the most forested area with 31.6 acres.

In November, the group estimated the line would cause \$2 billion worth of damage to the environment, but a recently released draft environmental impact study tries "to downplay (that) impact," according to a posting on the Buck Mountain group's Web site.

TVA disagreed.

"(The report) basically said they didn't find any environmental issues that would stop the project." TVA spokeswoman Myra Ireland said earlier this month. "But this is a draft, and we're still making sure we have all the information. That's why it's open for comment, to make sure there's nothing we've missed."

Comments regarding that environmental assessment are still being collected, and the TVA recently extended that deadline by two weeks until Jan. 15.

And for the year 2008, the group plans on continuing its fight.

Since construction on the line is expected to begin in the spring, they will need to move quickly.

UCEMC board members have continually refused to meet with them, and several requests for information from UCEMC and TVA have been denied.

The group is meeting with the TVA vice president on Jan. 7, and plans on demanding a full environmental impact statement, which could delay the project more than a year, but would provide the most comprehensive look at possible environmental damages.

They are also petitioning Sen. Charlotte Burks to help support legislation that would essentially make private cooperatives, such as UCEMC,

http://www.herald-citizen.com/index.cfm?event=news.view&id=0CB9842B-19B9-E2E2-673A721931F339B5 (4 of 5) [12/29/2007 12:03:31 PM]

Stein – page 20

#### Herald-Citizen Online Edition - Cookeville, TN

subject to open records laws. And the lawsuit they are planning against TVA seems to be gaining speed.

"I think we have a legitimate case, based on the (lack of) need and the environmental damage the line will do," Isbell said. "They could run the

line down (Hwy.) 111 and avoid cutting down a single tree.

"We're very upset about this whole thing, and we will continue to challenge this. They've sent people to appraise our property, but I don't want

their money. My land's not for sale."

Copyright & 2007 The Herald-Cilizen, All rights reserved.

The information occidented berein is profested by the copyright laws of the United Status. The copyright laws prohibit any copyring, redistributing, retransmitting, broadcasting or reprepaying of any copyright-protocinal material.

#### FORM HORSING OPPOSTUNITY



PUBLISHER'S NOTICE: All real extate advertised in this newspaper is subject to the Facteris Fast Housing Act of 1969 and the Territoriese Harrish Rights Act which makes it illegal to advertise. "Buy preference, limitation or discrimination based on race, color, religion, ear, handings / describing, familial safets, or radional origin or an infention to make any such perference, limitations or discrimination based on race, color, religion, ear, handings or describing to ran infention to make any such perference. Intelligence or discrimination or make any advertising the real vertice for the color of the law. Our readors are informed that all dwellings advertised in this newspaper are available on an expert opportunity.

http://www.herald-citizen.com/index.cfm?event=news.view8id=0CB9842B-1989-E2E2-673A721931F339B5 (5 of 5) [12/29/2007 12:03:31 PM]

· News Story



Call 931-526-9715 To Subscribe.

## Herald-Citizen

## Residents: TVA line will hurt environment

### Liz Engel

Herald-Citizen Staff

COOKEVILLE -- A proposed Tennessee Valley Authority transmission line in the Cookeville and Algood area could cause more than \$2 billion worth of environmental damage, according to findings by residents in the area.

Documents collected recently, including reports from the USDA Forest Service, list the benefits of trees in the Buck Mountain area that will be lost as more than 31.6 acres will be cut down to made way for the transmission line expected to be in service by June 2008.

The line -- which will run about 5.2 miles from a line parallel to Interstate 40 -- has been deemed necessary by TVA and Upper Cumberland Electric Membership Cooperative officials to update a UCEMC substation in Algood.

The particular route affected, chosen over 17 others, was said to have the least environmental impact -- affecting the fewest amount of property owners and avoiding impact to area wetlands and the Booger Swamp area.

But residents say the overall damage, especially to the trees, is being overlooked.

Trees responsible for production of oxygen, air pollution control, and recycling and purification of ground water among many things will be lost.

http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.html?[rkey=0047040+[cr=gdn (1 of 4) [11/5/2007 10:22:44 PM]

News Story



"I think those documents said that 25 percent or more of the route they picked was along steep slopes," said Buck Mountain resident Barry Stein said.

"So you cut the trees down, and the soil's going to erode in that area. You're going to contribute to the degradation of the water in the ground, and once the soil erodes away there's not going to be any opportunity for trees to grow there."

Stein and a group known as the Buck Mountain Community Organization have been fighting the proposed transmission line -- which they consider unnecessary -- since it was first proposed during a public meeting with TVA officials back in February.

He came up with the figure of \$2 billion by taking the environmental value of a tree -- estimated at \$162,000 over a 50-year life span -- and multiplying it times the number of trees, about 12,640 over the 31.6 acres.

"There's not a demonstrated need for this power line, but we're going to go in and do over \$2 billion worth of damage to the environment?" Barry Stein said. "That seems ridiculous."

Residents in the area are still planning to take the matter to court and are still fighting to get controversial reports released that show the need for the line in the area.

UCEMC, a private electric cooperative, is not subject to open records laws and has said the report would compromise confidential company information.

But UCEMC did release on the TVA project Web site that it expects a 30 percent growth through that Algood substation over the next three to five years. It sites the addition of a 400-unit apartment complex, two housing developments, a school, bank drug store and three new industries.

But Stein still wants the rest of the report.

"We're stuck with them telling us, 'just trust us,'" Stein said.

http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.html?[rkey=0047040+[cr=gdn (2 of 4) [11/5/2007 10:22:44 PM]

### Stein - page 23

News Story

"We're in a situation where we want to scrutinize, particularly decisions that involve eminent domain. The public ought to be able to do that -- anytime their property's being confiscated."

Published November 03, 2007 3:14 PM CDT

### Send this story to a friend !!!

| To: (Enter E-Mail Addres | SS)   | O Send as Text    |
|--------------------------|-------|-------------------|
| From: (Enter E-Mail Add  | ress) | O Send as HTML    |
| Send E-Mail!             | Reset | _ O Selid as HTML |

COPYRIGHT ® 2007 Herald-Citizen, a division of Cleveland Newspapers, Inc. All rights reserved.

The information contained herein is protected by the copyright laws of the United States. The copyright laws prohibit any copying, redistributing, retransmitting, broadcasting or repurposing of any copyright-protected material.

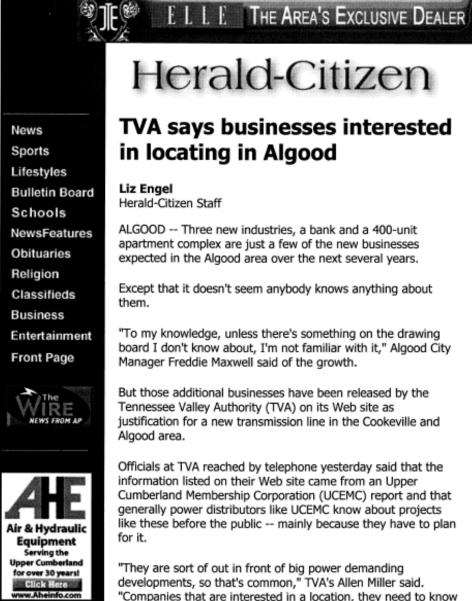
EQUAL HOUSING OPPORTUNITY



PUBLISHER'S NOTICE: All real estate advertised in this newspaper is

http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.htmi?[rkey=0047040+[cr=gdn (3 of 4) [11/5/2007 10:22:44 PM]

News Story



## TVA says businesses interested in locating in Algood

Herald-Citizen Staff

ALGOOD -- Three new industries, a bank and a 400-unit apartment complex are just a few of the new businesses expected in the Algood area over the next several years.

Except that it doesn't seem anybody knows anything about

"To my knowledge, unless there's something on the drawing board I don't know about, I'm not familiar with it," Algood City Manager Freddie Maxwell said of the growth.

But those additional businesses have been released by the Tennessee Valley Authority (TVA) on its Web site as justification for a new transmission line in the Cookeville and

Officials at TVA reached by telephone yesterday said that the information listed on their Web site came from an Upper Cumberland Membership Corporation (UCEMC) report and that generally power distributors like UCEMC know about projects like these before the public -- mainly because they have to plan

"They are sort of out in front of big power demanding developments, so that's common," TVA's Allen Miller said. "Companies that are interested in a location, they need to know that (power) can be supplied.

http://www.herald-citizen.com/NF/omf.wnm/herald/news\_story.html?rkey=0046028+cr=gdn (1 of 4) [9/6/2007 7:08:51 AM]

News Story



"Of course some of this speculative in some way," Miller said.

Miller said specifically Home Depot, a medical center, Walgreens, a Christian school and the large apartment complex were all listed as potential businesses looking at the Algood area.

Maxwell said at one time last year there were plans to develop 23-acres off Highway 111 for apartments and housing, but that the deal had fallen through.

Institutional Wholesale is planning a 60,000 square foot expansion, and Putnam County School Director Kathleen Airhart has said there are plans to build a new elementary school in the area.

But it's the speculative part that has residents in the path of the transmission line worried -- several residents around and along the route have been fighting the line since it was first proposed back in February.

"I've checked with every public official I can find, and nobody knows about three new industries coming in anywhere," Paul Isbell, a resident in the line's path, said. "I don't know where they're getting their information, so we're still questioning that."

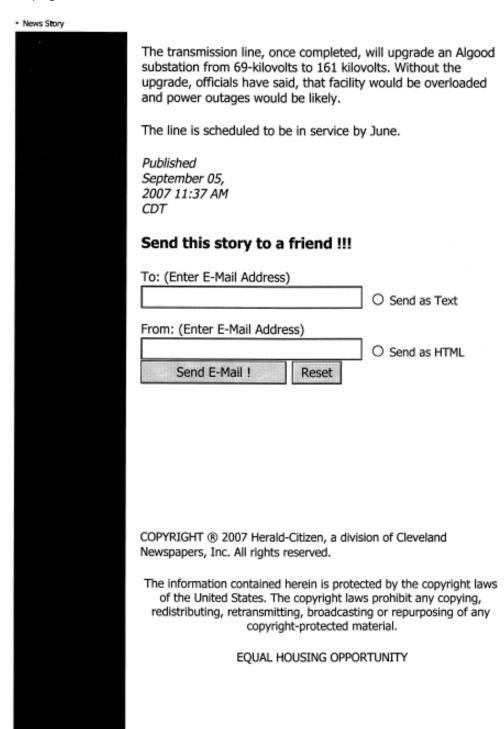
But the TVA is continuing along its schedule for construction, regardless.

Surveying work began in July, but TVA spokeswoman Myra Ireland wrote in an e-mail last month that five homeowners had failed to give TVA permission to enter onto their property.

Isbell, who lives along Buck Mountain, was one of them, and said he was served last week with a court order that would grant TVA the temporary right to enter the land to conduct surveys, core drilling and related activities in connection with the transmission line. The order said Isbell had 20 days to file an objection, but Isbell said TVA has already begun the process of cutting trees and laying survey markers along his property.

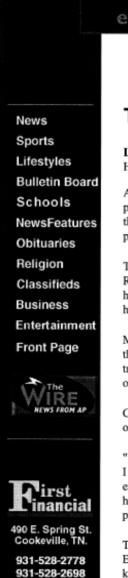
http://www.herald-citizen.com/NF/omf.wnrn/herald/news\_story.html?rkey=0046028+cr=gdn (2 of 4) [9/6/2007 7:08:51 AM]

### Stein - page 26



http://www.herald-citizen.com/NF/omf.wnm/herald/news\_story.html?rkey=0046028+cr=gdn (3 of 4) [9/6/2007 7:08:51 AM]

· News Stery



## network engineering walls new media

# Herald-Citizen

### TVA extends input deadline

Liz Engel Herald-Citizen Staff

ALGOOD -- The deadline for the public to comment on a proposed Tennessee Valley Authority (TVA) transmission line in the area has been extended by the power company after some pressure from a Tennessee state representative.

The extension was prompted mainly by concern raised by U.S. Rep. Bart Gordon over the project and the effect the lines will have on property owners as well as the environmental issues that have been raised.

More than 200 property owners were notified earlier this year that they may be in the path of one of 18 proposed routes for the transmission line, drawing concern and a good amount of criticism over the project.

Citizens now have until March 16 -- a week longer than the original March 9 deadline.

"While it appears an upgrade may be needed in this growing area, I have encouraged TVA not to impact private property and the environment with their routing," Gordon said. "Residents now have an opportunity to let TVA know what they think of the proposed routes."

The transmission line would upgrade an Upper Cumberland Electric Membership Corporation (UCEMC) substation from 69kilovolts to 161-kilovolts. The line would extend from TVA's existing South Cookeville-Monterey 161-kilovolt transmission

http://www.herald-citizen.com/NF/omf.wnm/herald/news\_story.html?rkey=0043593+cr=gdn (1 of 3)3/5/2007 3:07:07 AM



line, which parallels I-40 on the north side, to the Algood substation, located about four miles north at 260 First Ave., in Algood. The transmission line would consist of single steel-pole structures centered on a new 100-foot right-of-way.

While the project has been deemed necessary by both the TVA and UCEMC, the project hasn't come without controversy. Several citizens against the project, including those known as the Buck Mountain Community Organization, have been lobbying local officials to find an alternative to the transmission line. Gordon's office recently contacted TVA and asked the agency to consider proposals that would use existing rights-of-way and reduce the effect on landowners.

TVA officials have said that it will take about two to three weeks after the deadline to select a route and that no route had been given any preference over another.

To submit a comment about the project, contact Todd Moore, TVA, 1101 Market St., MR 4G Chattanooga, TN 37402-1801, call 800-362-4355 or e-mail newtransline@tva.gov. Any comments received, including names and addresses, will become part of the administrative record and will be available for public inspection.

Published March 03, 2007 2:06 PM CST

### Send this story to a friend !!!

| To: (Enter E-Mail Address)   |                |
|------------------------------|----------------|
|                              | O Send as Text |
| From: (Enter E-Mail Address) | _              |
|                              | O Send as HTML |
| Send E-Mail! Reset           |                |
|                              |                |
|                              |                |
| CONTINUOUS CASCALL ALCOHOL   |                |

COPYRIGHT ® 2007 Herald-Citizen, a division of Cleveland Newspapers, Inc. All rights reserved.

The information contained herein is protected by the copyright laws of

http://www.herald-citizen.com/NF/omf.wnm/herald/news\_story.html?rksy=0043593+cr=gdn (2 of 3)3/5/2007 3:07:07 AM

News Story



## network engineering walls new media

# Herald-Citizen

## UCEMC won't release report

Liz Engel Herald-Citizen Staff

ALGOOD -- Upper Cumberland Electric Membership Corporation (UCEMC) won't release the report that shows a need for a new Tennessee Valley Authority (TVA) transmission line in the area.

According to UCEMC officials, the report regarding the need for upgrading an Algood substation is part of an overall document outlining the corporation's long-term plans and several other UCEMC projects. The document was put together by two consulting-based engineering firms — R.W. Beck and PowerTech Engineering — and paid for by UCEMC.

"We're not trying to be uncooperative, really," Carl Brandt, UCEMC general manager, told the Herald-Citizen yesterday. "There's a lot of information in there, both financial and confidential. Upper Cumberland is a private corporation so we're not subject to open record laws."

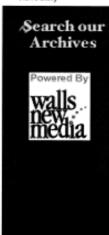
Another major reason for withholding the report, Brandt said, is because of a lengthy federal lawsuit the corporation is currently fighting with the City of Cookeville. The case is currently working its way through the appellate court and will be heard again on March 5 by the 6th U.S. Circuit Court of Appeals.

"There is proprietary information that we feel could be used by the city that we don't feel comfortable, and that our legal counsel has advised us not to give away," Brandt said.

The report claims that nearly eight megawatts of new load is

http://www.herald-citizen.com/NF/omf.wnm/herald/news\_story.html?rkey=0043564+ce=gdn (1 of 4)3/1/2007 2:59:50 PM

· News Story



projected for the area by the summer of 2008 and that the additions would overloaded the existing electrical facilities.

To meet that growth, TVA is planning on building a four-mile long transmission line to upgrade the substation from 69-kilovolts to 161-kilovolts. To reach that substation, TVA selected 18 alternative routes which, in all, affect more than 200 property owners. TVA is expected to select one of the routes by the end of the month.

The public outcry for UCEMC to release the report came shortly after a TVA-held meeting in Algood last month regarding the transmission line. A group opposing the transmission line has even questioned whether or not the report actually exists and has been pushing the TVA, UCEMC as well as local government officials to explore more environmental-friendly alternatives to the transmission lines.

"There is a side of me that says, 'who is it who thinks they need this information?" Brandt said. "What is their expertise? Just because they're a professor over at Tennessee Tech doesn't make them an expert at everything."

Brandt assures the need for the substation upgrade is great. It already serves several large commercial business -- including Wal-Mart and Institutional Wholesale, as well as several schools -- and its existing capacity is already overloaded. In fact, he said, the substation has been overloaded for the past six years and if something isn't done soon, it could lead to a bad situation in Algood.

"Surely we're not going to spend \$2.5 million to build a substation for no reason at all," Brandt said. "All these reports that we've gotten done tell us by the summer of 2008 (our customers will be) in the dark. That's what could happen if we do not do something. How does that impact growth? How does that impact economic development? Tremendously."

"We don't want to put people in the dark, and I don't want to have a substation burnt up," Brandt said. "We have to provide the power. This 161(kilovolt) delivery would give us a more reliable source of power. And that's our whole intention -- to make sure we have adequate supply of power to serve the needs."

http://www.herald-citizen.com/NF/omf.wnm/herald/news\_story.html?rkey=0043564+cr=gdn (2 of 4)3/1/2007 2:59:50 PM

News Story

### SIDEBAR

The TVA is still accepting written comments regarding the transmission line routes. Comments will be received until March 9. For more information about the project or to submit a written comment, contact Todd Moore at 1101 Market St., MR 4G, Chattanooga, TN 37402-1801 or at newtransline@tva.gov.

Published March 01, 2007 11:21 AM CST

### Send this story to a friend !!!

| To: (Enter E-Mail Address)   | O Send as Text     |
|------------------------------|--------------------|
| From: (Enter E-Mail Address) | O Send as HTML     |
| Send E-Mail ! Reset          | ] O Scale as ITTME |

COPYRIGHT ® 2007 Herald-Citizen, a division of Cleveland Newspapers, Inc. All rights reserved.

The information contained herein is protected by the copyright laws of the United States. The copyright laws prohibit any copying, redistributing, retransmitting, broadcasting or repurposing of any copyright-protected material.

#### EQUAL HOUSING OPPORTUNITY



PUBLISHER'S NOTICE: All real estate advertised in this newspaper is subject to the Federal Fair Housing Act of 1968 and the Tennessee Human Rights Act which makes it illegal to advertise "any preference, limitation or discrimination based on race, color, religion, sex, handicap / disability, familial status, or national origin or an intention to make any such preference, limitation or discrimination."

http://www.herald-citizen.com/NF/ornf.wnm/herald/news\_story.html?/rkey=0043564+cr=gdn (3 of 4)3/1/2007 2:59:50 PM

News Stoey



# Residents speak out against

ALGOOD -- The 101-acre farm that Charles and Mary Frances Carter have lived on for more than 50 years is now right smack in the middle of one of 18 proposed routes for a new transmission line the Tennessee Valley Authority (TVA) plans to build in the

Charles, along with his daughters Janice Blaylock and Rebecca Lane were among more than 170 people who attended the TVA's open house yesterday regarding the proposed transmission line, which TVA officials have said is necessary "in order to maintain reliable electric service, meet growing demand and avoid possible power supply disruptions to residential and commercial areas of

"We are very upset about this," Rebecca said of the proposal. "We don't want big steel posts through the middle of our farm. It will destroy the gorgeous view. And it may look like underdeveloped mountain land, but there's priceless history in this area."

Eighteen routes have been proposed by the TVA and the open house was the first and only opportunity for the public to discuss the routes face-to-face with TVA officials. A new 161-kilovolts (kv) transmission line will run about four to five miles from a transmission line that parallels Interstate 40 up to an Upper Cumberland Membership Corporation-owned substation located in Algood at 260 First Ave., upgrading that substation from 69-kv to

http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.html?[rkey=0043275+[cr=gdn (1 of 6)2/11/2007 3:53:57 PM

- News Stery



One of the 18 proposed routes cuts the Carter farm on Buck Mountain Road directly in half, runs within 400 feet of the Carter's home and will run across at least a mile of their property. And with a pole needed about every 500 feet, the Carters could be looking at 10 poles lined right through the middle of the family farm.

Donning orange ribbons, the Carters and several of their neighbors were there to push TVA toward exploring alternatives to the transmission lines, such as building the transmission lines underground, which would significantly increase the cost of the project, or by implementing a distributed generation system in which large electricity users agree to have their power interrupted during peak use times. Institutions and businesses could purchase backup generators to provide their own power during peak power demand and not only pay for the generators and fuel, but may also save money with the substantial savings in electricity costs.

The group, called the Buck Mountain Organization, was spearheaded by resident Barry Stein and several of his neighbors after realizing the impact transmission lines could have on the area.

"If someone tells me there's only one way to solve a problem, that automatically raises a red flag," Stein said. "I understand the TVA guys are just doing their job. They've always done business in a certain way and don't think in ways that would support other approaches that would reduce the need for electricity."

The group is concern about the impact the lines will have on the environment, historical sites as well as the effect on property values in the area. From his research, Stein said the value of the Carter farm could drop as much as 40 percent as a result of the lines and is also worried about construction destroying areas that contain sink holes, bluffs and caves.

TVA officials say both alternatives have been considered and are not likely options for this type of project.

"Building (lines) underground just has a whole set of issues," TVA Senior Consultant Myra Ireland said. "For one, it's eight to 10 times more expensive. And when there's a problem with the line, you have a longer time locating the source of the problem and

http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.html?[rkey=0043275+[cr=gdn (2 of 6)2/11/2007 3:53:57 PM

### Stein - page 34

- News Story

getting to it."

Plus, according to TVA Manager of Siting and Environmental Design Roger Sparry, with underground lines there are possibly more environmental issues to consider.

"Underline (lines are) not really as beneficial as they might appear to be because of the cost and environmental issues," Sparry said. "The environmental impact, in most cases, are pretty substantial because you have to dig large trenches the entire length of the line. There is a lot of ground disturbance, steam crossings and you still have to clear trees and vegetation."

And as far as the possibility of using a distributed generation system, TVA officials say that it is also a very costly project and may only benefit very large industries.

"I am sure that Upper Cumberland (Electric) probably looked at that," Sparry said. "I know from a cost and reliability standpoint that it's not as favorable as a new substation and an additional line to feed that substation. And there are additional environmental issues with those as well."

Todd Moore, TVA siting engineer, told the Herald-Citizen last week that if the Algood substation is not upgraded, then there will be serious problems meeting the load of demand come summer '08. But both TVA officials and Upper Cumberland Electric officials refuse to release the records used to make that determination, calling it "sensitive information." But that's something Stein just isn't buying.

"You're telling us you don't have enough peak power, but you're not showing us the report?" he said. "We should have open access to planning documents. Share those records so we can understand."

Now residents must wait for a 30-day comment period to pass before TVA officials will be ready to designate one of the 18 routes as a "preferred route." An extensive environmental assessment will begin once the route is chosen and property owners will be notified by letter for approval for the TVA to conduct field surveys on their property. Property owners, of course, have the right to accept or refuse the offer, but TVA could

 $http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.html?[rkey=0043275+[cr=gdn~(3~of~6)2/11/2007~3:53:57~PM] \\$ 

### Stein – page 35



possibly take out a court order or even exercise eminent domain.

"We can get a court order to go on the property if we have to," Ireland said. "But we try not to. We really try to work with property owners and work out any issues -- we try to agree on something that will work out for both of us.

"And we're a long way from (eminent domain) because we don't even have a preferred route. I know we had a good turnout last night. We had a lot comments, a lot of information and people asked about other possibilities. So Todd (Moore) has to look at all of that to see if anything else is possible."

But if route one is chosen as the preferred route, the Carter's are prepared to fight back if necessary.

"I am prepared to take this case to court," Janice said.

n To make a comment about the TVA's proposal, contact Todd Moore, TVA siting engineer, at 1101 Market St., Chattanooga, TN 37402, fax him at (423)751-4098, call him at (800)362-4355 or email newtransline@tva.gov. The Buck Mountain Community Organization has started a Web site for information regarding its opposition to the transmission line. It can be viewed at www. notvapowerline.com/.

Sidebars

TVA estimated project timeline

March 9, 2007 End of public comment period

Spring 2007 Announcement of preferred route for field surveys

Winter 2007/2008 Completed environmental review

Spring 2008 Project construction begins

Summer 2008 Project completes

Published February 07, 2007 12:08 PM CST

http://www.herald-citizen.com/NF/omf.wnm/herald/archive\_display.html?[rkey=0043275+[cr=gdn (4 of 6)2/11/2007 3:53:57 PM

### Robert M. Todd

Tennessee Wildlife Resources Agency Nashville, Tennessee Comment:



## TENNESSEE WILDLIFE RESOURCES AGENCY

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

RECEIVED

December 13, 2007

Tennessee Valley Authority
Attention: Jon M. Loney, Manager
NEPA Administration
Environmental Policy and Planning
400 West Summit Hill Drive
Knoxville, TN 37902-1499

| Doc. Type:    |  |
|---------------|--|
| Index Field:  |  |
| Project Name: |  |
| Project No.:  |  |

DEC 2 1 2007

Re: Comments Regarding the Draft Environmental Assessment – Power Supply Upgrade – Algood 161-KV Transmission Line, Putnam County, Tennessee

Dear Mr. Loney:

The Tennessee Wildlife Resource Agency has reviewed the Draft Environmental Assessment – Power Supply Upgrade – Algood 161-KV Transmission Line and provides the following comment. It is the opinion of the Tennessee Wildlife Resource Agency that the Tennessee Valley Authority should mitigate for the conversion of 0.46 acre of forested wetland, Category 2 wetland, to an emergent/scrub-shrub wetland due to the loss of functional values associated with this conversion.

Thank you for the opportunity to comment.

Sincerely,

Robert M. Todd

Fish and Wildlife Environmentalist

Robert M. Jodd

cc: Bobby Brown, Region III Habitat Biologist John Mayer, Region III Manager Dr. Lee Barkley, U.S. Fish and Wildlife Service Darryl Williams, Environmental Protection Agency

The State of Tennessee

IS AN EQUAL OPPORTUNITY, EQUAL ACCESS, AFFIRMATIVE ACTION EMPLOYER

### **Mark Tummons**

Tennessee Department of Environment and Conservation Recreation Educational Services Nashville, Tennessee Comment:



## STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Recreation Educational Services 10th floor - L&C Tower 401 Church Street Nashville, Tennessee 37243 (615) 532-0748 (615) 532-0778 FAX

December 10, 2007

Mr. James F. Williamson, Jr. Tennessee Valley Authority 400 West Summit Hill Drive-WT11D Knoxville, TN 37901

Re: Proposed 161KV Transmission Line

Dear Mr. Williamson:

Thank you for the opportunity to offer comments and input on the above mentioned project. Based on available information concerning the proposed TVA Algood 161-KV Transmission line, we were able to determine that the project will run within approximately 2,000 feet of park and recreational areas funded through the State of Tennessee in the City of Algood.

Recreation Educational Services (RES) is currently funding, or has approved funding for projects in Putman County in the vicinity of the transmission line. The distance appears adequate from the grant sites to have minimal impact on the project. The cities of Cookeville and Algood should be contacted for specifics concerning their planned local park construction. Based on available information, RES has no reason to oppose said project at this time.

Sincerely,

Mark Tummons, CPRP

Director, RES

### Jonathan Williams

Cookeville, Tennessee

Comment:

"If this new line is necessary, more consideration should be given to the idea of following along Highway 111 or some other existing road(s) as much as possible in order to minimize the damage to or loss of private property."

### Randall D. Williams

Upper Cumberland Development District Cookeville, Tennessee Comment:

### UPPER CUMBERLAND DEVELOPMENT DISTRICT

1225 South Willow Avenue Cookeville, TN 38506 Phone: (931) 432-4111 Fax: (931) 432-6010 Chairman: Stephen Bilbrey

Vice Chairman: John II, Mullinix

Sespetary: Kenneth Copeland

Treasurer: Billy Robbins

Executive Director: Wends Askins

11 January 2007

Mr. James F. Williamson, Jr. Tennessee Valley Authority 400 West Summit Hill Drive Knoxville, TN 37902

Dear Mr. Williamson:

I am writing this letter at the request of the Buck Mountain Community Organization. As historic preservation planner for the Upper Cumberland Development District in Cookeville, it is my professional opinion, that the old Horse and Carriage Route, or Mail Route, on Brotherton Mountain in Putnam County is eligible for listing in the National Register of Historic Places due to its historical and cultural significance to the early settlement of the Upper Cumberland region. The route also has significance as an Indian trail leading to habitation areas in the vicinity of the Falling Water River. A considerable amount of artifactual material has been found in the immediate area.

This route falls within the footprint of the proposed TVA transmission line project for the Algood substation. Based on current data, this project would have a detrimental effect on the cultural resources of the area in question.

Respectfully,

Randal D. Williams

Historic Preservation Planner

Upper Cumberland Development District

RW/rdw