

Appendix F

Response to Comments on the DEIS



Appendix F

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Appendix F1

Introduction and Overview



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List of Acronyms

DEIS	Draft Environmental Impact Statement
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
ROS	Reservoir Operations Study
TVA	Tennessee Valley Authority
USFWS	U.S. Fish and Wildlife Service

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F1 Introduction and Overview

The Draft Programmatic Environmental Impact Statement (DEIS) on the Tennessee Valley Authority's (TVA's) Reservoir Operations Study (ROS) was distributed in July 2003 for review and comment. Approximately 1,530 copies of the DEIS were sent to affected tribal governments, agencies, organizations, and individuals. The Notice of Availability of the DEIS was published in the *Federal Register* on July 3, 2003. The comment period closed on September 4, 2003, but TVA continued to accept comments through mid-October from tribes and persons who informed the agency that their comments would be late.

Appendix F contains TVA responses to substantive comments on the ROS DEIS. In response to some comments, changes were made to improve the content of this Final Programmatic Environmental Impact Statement (FEIS). Regardless of whether a comment generated a modification to the FEIS text, TVA provided a response to the issue raised.

Comments were provided by members of the public, organizations, and interested agencies at 12 interactive workshops held around the Tennessee Valley region after the DEIS was released. Approximately 1,700 individuals registered at the workshops (Table F1-01). Attendees were able to discuss issues with TVA and EIS contractor staffs, obtain material about the study, and view information displays and a short video. Workshop participants learned the results of analyses performed, including model results of the impacts of the policy alternatives on pool elevations, flow releases, and power generation for specific reservoirs. During these workshops, comments could be made in writing, using comment cards; given to court reporters; or entered on computer terminals through an interactive software program that was specially designed to assist the public in providing comments. TVA posted a copy of the DEIS on its official agency internet web site, where comments also could be made. In addition, TVA accepted comments by surface or electronic mail, telephone, and facsimile.

While the ROS proceeded, TVA continued to meet with its cooperating agencies and with members of the Public Review Group and Interagency Team to receive their input on the DEIS. TVA conducted special briefings with resource agency staffs, including the U.S. Environmental Protection Agency, to apprise them of ROS analyses and progress. These briefings provided interested agencies multiple opportunities to help direct and influence the scope and substance of the study, the EIS process, and associated analyses. TVA also held briefings with about 200 community leaders and representatives of interest groups to share information and to receive their input on the DEIS (Table F1-02).

The U.S. Fish and Wildlife Service (USFWS) has served multiple roles in the ROS. It provided input as part of the Interagency Team and submitted comments on the DEIS that were part of the letter from the U.S. Department of the Interior. This letter is reproduced in Appendix F4. The USFWS is also obligated to respond to TVA's determinations about potential impacts on threatened and endangered species under the Endangered Species Act (ESA). This is fulfilled by the USFWS's Biological Opinion in Appendix G. TVA's response to the USFWS's ESA determinations and comments on the DEIS are in the text of the EIS and Appendix F4, as appropriate.

Appendix F1 Introduction and Overview

Table F1-01 ROS Community Workshop Attendance

Date	Location	Attendance
July 21, 2003	Murfreesboro, TN	30
July 22, 2003	Knoxville, TN	58
July 24, 2003	Bristol, TN	299
July 28, 2003	Morristown, TN	479
July 29, 2003	Murphy, NC	53
July 31, 2003	Blairsville, GA	407
August 5, 2003	Chattanooga, TN	53
August 7, 2003	Decatur, AL	106
August 12, 2003	Gilbertsville, KY	105
August 14, 2003	Pickwick, TN	70
August 19, 2003	Muscle Shoals, TN	54
August 21, 2003	Columbus, MS	10
Total workshop attendance		1,724

Table F1-02 ROS Special Stakeholder Briefings Attendance

Date	Location	Attendance
July 17, 2003	Morristown, TN	55
July 21, 2003	Murphy, NC	15
July 22, 2003	Blairsville, GA	28
July 24, 2003	Dalton, GA	6
July 29, 2003	Guntersville, AL	27
July 29, 2003	Decatur, AL	24
July 31, 2003	Gilbertsville, KY	14
August 6, 2003	Columbus, MS	6
August 6, 2003	Muscle Shoals, AL	25
Total briefing attendance		200

TVA and the cooperating agencies sincerely appreciate the time and effort of private citizens representing different stakeholder interests on the Public Review Group, as well as those agency representatives who participated as part of the Interagency Team. Their involvement ensured continued public and agency involvement throughout the ROS, and provided independent oversight of study activities and analyses.

F1.1 Overview of Comments Received on the DEIS

Including form letters and petitions, TVA received a total of 2,320 sets of comments on the DEIS (Table F1-03). These sets of comments included input from almost 7,000 individuals, 7 federal agencies, 14 state agencies, 1 tribal government, 8 county and local government agencies, and 42 other organizations. TVA has carefully reviewed all of the comments, has identified specific comments about the EIS contained in each of them, and has associated similar comments to produce a list of approximately 3,264 separate comments (Table F1-04). These comments are arranged in three major sections: general comments, issues, and concerns; specific public comments; and federal and state agency comments. Comments received from federal and state agencies were also published separately.

Due to their large volume and similarity, the general comments, issues, and concerns were summarized and combined into categories of comments (Table F1-05; also see Section F2). These general comments were categorized for easier public review and to avoid repetition. A single response is provided for comments that fell into each category. The names of people who provided comments under each category are listed following the summary of comments within the category. Additionally, 4,602 individuals signed a petition supporting pool stabilization during fish spawning, and multiple individuals signed form letters supporting specific alternatives or resource concerns.

Because the general comments, issues, and concerns were summarized, the exact wording of the comments was not always used. Also, in many cases, the commenters listed with a combined comment may not have raised all of the points in the comment summary, but they supported the primary premise or issue captured by the combined comment. For example, most of the comments that TVA received simply “voted” for one or more of the identified alternatives. A large number of individuals supported Reservoir Recreation Alternatives A and B. Many of those supporting these alternatives said they did so because reservoir levels would be held up longer in summer, thereby increasing recreation opportunities, lake-front property values, scenic beauty, and recreation-related expenditures.

Other commenters listed under the combined comment, Support for Reservoir Recreation Alternative A, however, may have simply stated, “I support Recreation A” and did not give a reason or did not mention any of the other points in the combined comment. Therefore, it should not be assumed that all commenters identified with a combined comment necessarily support all facets of that comment. While summarizing and combining comments, TVA has attempted to retain all important discrete nuances or differences among comments. A number of summarized comments may still be somewhat repetitious because further refinements could have distorted an important element of a specific combined comment.

Appendix F1 Introduction and Overview

Table F1-03 ROS DEIS Comment Source and Number of Comment Segments

Source of Comment	Number of Sets
Comment card	57
Court report transcript	140
E-mail	27
Fax	13
Governmental	22
Letters from general public	268
Telephone	31
Internet web site	825
Workshop—Blairsville, GA	306
Workshop—Bristol, TN	111
Workshop—Chattanooga, TN	51
Workshop—Columbus, MS	3
Workshop—Decatur, AL	42
Workshop—Florence	13
Workshop—Gilbertsville, KY	72
Workshop—Knoxville, TN	29
Workshop—Morristown, TN	261
Workshop—Murfreesboro, TN	16
Workshop—Murphy, NC	19
Workshop—Pickwick Dam, TN	14
Total number of comments	2,320

Table F1-04 Number of Comments on Alternatives and Resource Areas

Subject	Number of Comments
Alternatives	
Base Case	148
Reservoir Recreation A	916
Reservoir Recreation B	307
Summer Hydropower	33
Equalized Summer/Winter Flood Risk	26
Commercial Navigation	54
Tailwater Recreation	41
Tailwater Habitat	16
Study Areas	
Air resources	13
Aquatic plants	23
Aquatic resources	44
Climate	1
Cultural resources	14
Dam safety	4
Flood control	155
Groundwater resources	2
Invasive terrestrial and aquatic animals and terrestrial plants	8
Shoreline development and land use	6
Managed areas and ecological significant sites	13
Navigation	30
Power	32
Prime farmland	3
Recreation	80
Fishing	89
Shoreline erosion	68
Social and economic resources	86
Terrestrial ecology	70
Threatened and endangered species	27
Vector control	23
Visual resources	13
Water quality	51
Water supply	24
Wetlands	31
Water levels	571
Cumulative impacts	2
Mitigation	8
NEPA process	163
Minimum flow	3
Out of scope	48
Policy	5
Authority	13
Total number of comments	3,264

Appendix F1 Introduction and Overview

Table F1-05 General Comments, Issues, and Concerns Raised by Members of the Public

Environmental Review Process and Public Involvement	
1.	EIS and public involvement
2.	Operating priorities
3.	Changes to the environmental impact statement
4.	Communications
Alternatives	
1.	Base Case – Support for Base Case; prefer Base Case – Opposed to Base Case
2.	Reservoir Recreation Alternative A – Support for Reservoir Recreation Alternative A – Opposed to Reservoir Recreation Alternative A
3.	Reservoir Recreation Alternative B – Support for Reservoir Recreation Alternative B – Opposed to Reservoir Recreation Alternative B
4.	Summer Hydropower Alternative – Support for Summer Hydropower Alternative – Opposed to Summer Hydropower Alternative
5.	Equalized Summer/Winter Flood Risk Alternative – Support for Equalized Summer/Winter Flood Risk Alternative – Opposed to Equalized Summer/Winter Flood Risk Alternative
6.	Commercial Navigation Alternative – Support for Commercial Navigation Alternative – Opposed to Commercial Navigation Alternative
7.	Tailwater Recreation Alternative – Support for Tailwater Recreation Alternative – Opposed to Tailwater Recreation Alternative
8.	Tailwater Habitat Alternative – Support for Tailwater Habitat Alternative – Opposed to Tailwater Habitat Alternative
9.	Prefer Reservoir Recreation Alternatives A or B, A over B, B over A, or B or Tailwater Recreation Alternatives – Prefer Reservoir Recreation Alternative A or Reservoir Recreation Alternative B – Prefer Reservoir Recreation Alternative A over Reservoir Recreation Alternative B – Prefer Reservoir Recreation Alternative B over Reservoir Recreation Alternative A – Prefer Reservoir Recreation Alternative B or Tailwater Recreation Alternative – Other preferences
10.	Higher and longer reservoir pool levels
11.	Proposed combination/modification of alternatives
12.	Proposed project modifications
Study Areas	
1.	Water levels for fish spawning
2.	Migratory shorebirds
3.	Shoreline erosion
4.	Economic analysis and adverse effects on jobs and local economy
Out of Scope	
1.	Logs and debris
2.	Boater safety
3.	Jet skis
4.	Water pollution

Specific public comments are organized into 35 sections, generally matching the major subject areas and sections in the EIS. Within the subject areas, comments are ordered based on similarity and not according to the number of people who made a comment. At the end of each comment is the name of the author and an identifying number (#XX) that refers to the number of the original comment segments (numbers reflect the order in which the comments were received).

Except for letters from state and federal agencies, comments received from workshops, letters, and other sources are all categorized and listed together. Agency comments are reprinted verbatim in Appendix F4. Responses to individual agency comments are included after each letter.

Some comments were extensive and contained many sub-issues or elements. Not all sub-issues or elements were separately answered if TVA's primary response was applicable.

To assist the reader with navigating the appendix, along with a table of contents, Appendix F includes an index (Appendix F5). The index provides a list of commenters and references page number(s) where commenters are listed throughout Appendix F.

F1.2 How TVA Responded to Comments Received

Since its inception, the ROS process has been driven by public values and concerns. Without public participation, it would be difficult for TVA to attain its goal of identifying changes to existing operating policies that would improve the overall public value of the TVA reservoir system. Issues and concepts identified by public and agency comments during scoping—along with input from the Public Review Group and Interagency Team—helped define the scope of the study and the contents of the DEIS. Several issues and concepts presented in comments on the DEIS have been used to improve the content of the FEIS. Comments on the DEIS will also assist TVA and other agencies as they make more detailed decisions about how to manage the operation of the Tennessee River in such a way that will increase its value for the people of the region.

TVA developed a Preferred Alternative that combines and adjusts desirable features of the alternatives identified in the DEIS to create a more feasible alternative that is responsive to public comments. TVA has also attempted to capture the characteristics of the preferred alternative in succinct, understandable ways to aid the TVA Board to better appreciate the implications of the decisions it will be asked to make by TVA staff, as a result of this process.

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