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Tennessee Chapter

Charles P. Nicholson
NEPA Compliance Manager
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11D
Knoxville, TN 37902
April 15, 2003

Re: TVA Natural Resource Plan

Dear Mr. Nicholson:

Please accept these comments as representing the position of the Tennessee Chapter of The Sierra Club and its 6,600 members regarding the Tennessee Valley Authority's (TVA) draft Natural Resource Plan.

In general, we recommend TVA adopt a program option midway between the "enhanced" and "flagship" management options. While we would support the flagship option conceptually, we believe the gap in implementation levels between enhanced and flagship is too great to allow for successful results under realistic economic and management scenarios. However, that said, there are specific programs under the flagship option that we believe TVA should consider implementing as presented in the Plan. Further specific comments are listed below.

1. In the foreword to the Plan, it is stated (pg.1) that TVA historically received and spent \$40 million to \$50 million annually through federal appropriations for activities generally covered under the Plan. Since Congress terminated funding for nonpower activities in 1997, TVA has funded these activities at a level of about \$24 million (circa 2001) or less. The custodial management option of the Plan calls for expenditures in the range of \$7 – 10 million. The blended or enhanced management option, TVA's preferred option, calls for expenditures in the range of \$20 – 24 million, approximately the same level of funding TVA allocated over ten years ago. While TVA refers in the Plan to the "importance of TVA's involvement in preserving and protecting the Valley's lands", and refers to itself as the "environmental steward of the nation's fifth-largest river system", TVA's funding history for activities implementing its stewardship responsibilities does not reflect those statements. There is a disconnect between TVA's assertions of the importance of the Tennessee River Valley's natural resources

and their protection, and the actual level of importance allocated to those stewardship activities reflected in the level of funding provided.

2. The Plan does not state what management level the current level of stewardship funding represents.
3. It is difficult and confusing to the reviewer to identify the specific programs and level of activities included in the various alternatives. The body of the Plan refers to “custodial”, “enhanced” or “blended”, and “flagship” or “advanced” management options, but Appendix H refers to alternatives A, B, C, and D but does not define them. Rather it refers back to Chapter 3 of the Plan, which does not mention them. It would be helpful to more closely align the descriptions of programs in the Plan with those in the Appendix and provide consistent terminology to describe options or alternatives.
4. The Plan makes no mention of the relative importance of the Tennessee River System in terms of biodiversity, both aquatic and terrestrial, notwithstanding the historical fact that TVA, in building dams and managing the river, essentially destroyed the natural functioning of the river; the health of its ecosystems; and significantly altered and diminished its native populations of aquatic organisms, driving some species into extinction. The Plan makes no mention of any intentions to attempt to restore those values.
5. Neither the Biological Resources Management Program nor the Water Resources Management Program explicitly addresses the issue of the aquatic ecosystems of the TVA reservoirs. When TVA altered the river system from free-flowing into a series of artificial lakes, no consideration was given to what this alteration did to the aquatic ecosystems affected. The ecology of the reservoirs has been allowed to develop willy-nilly over the past 80 years, and is characterized by emphasis on game fishes and invasive species. Some effort should be made to at least bring the reservoir ecologies in line with native lacustrine ecosystems.
6. Even if TVA implemented the "Advanced Management Level ("gold standard") the proportion of TVA's total annual budget expended for the upper amount (\$55 million) would still amount to less than one percent (0.4 %) of the annual budget. This doesn't convey environmental leadership in a region rich in biological resources that have historically been adversely affected by TVA's construction and operations. For comparison, Bonneville Power Authority's (who also receives no congressional appropriations) annual operations budget in FY2010 was ~\$3 billion, of which they spent ~25% for fish & wildlife programs.
7. Programs we recommend including at the flagship level:
 - a. Biological and Cultural Resources Management
 1. Preservation Program

2. Trails Management
 3. Land Condition Assessment, and Land Stewardship Maintenance Checklist
 4. TVA Natural Heritage Database
 5. TVA Wetlands Database
 6. Public Outreach Programs
 7. Sensitive Biological Resources Management
 8. Terrestrial Habitat Management
- b. Recreation Management
1. Day Use Areas Management
- c. Water Resources Management
1. Aquatic Monitoring and Management
 2. Partnership Programs
 3. Water Resource Improvement Programs

The Tennessee Chapter Sierra Club appreciates the opportunity to provide comments on this important initiative of TVA and looks forward to partnering with TVA as TVA implements those portions of the final Plan that are appropriate for public participation.

Sincerely,

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