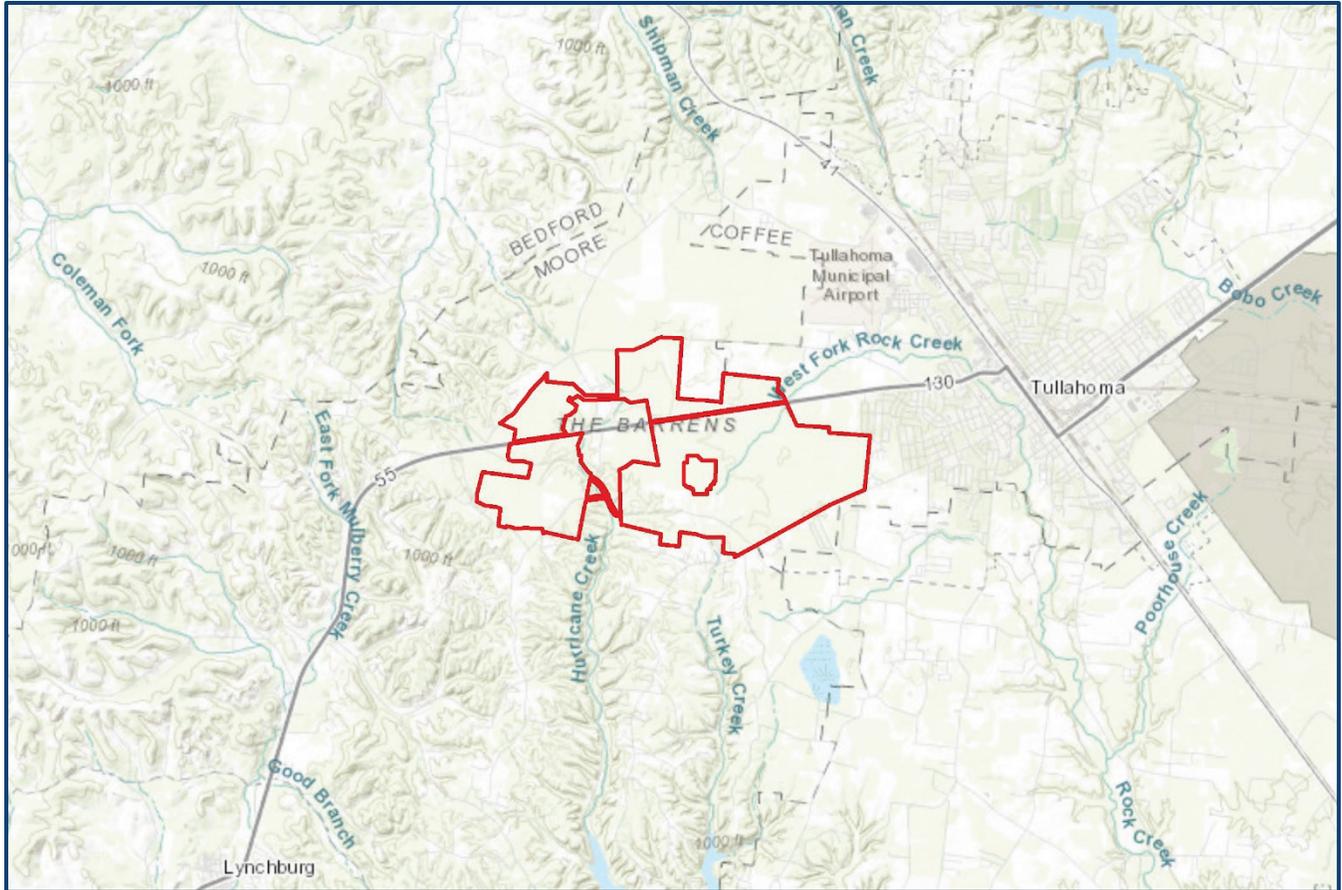


Moore County Solar

SCOPING REPORT

SEPTEMBER 3, 2021



Scoping Report Executive Summary

Tennessee Valley Authority (TVA) is preparing an environmental impact statement (EIS) to assess the potential environmental effects of a proposed solar photovoltaic (PV) facility in Moore County, Tennessee, known as Moore County Solar. The solar facility would be constructed within a project site measuring approximately 3,463 acres, of which approximately 2,000 acres are necessary to develop a 200-megawatt (MW) alternating current (AC) solar facility. The project site is bisected by State Route 55 and is within the metropolitan limits of Lynchburg, Tennessee (Figure 1). Moore County Solar would connect to the TVA Franklin-Wartrace No. 2 161-kilovolt (kV) transmission line (TL), which runs through the project site, and require upgrades on approximately 9.6 miles of this TL (Figure 2). Together, the solar facility and the TL upgrades are referred to herein as the Project.

In June 2019, TVA completed the final 2019 Integrated Resource Plan (IRP) and associated EIS. The IRP is a comprehensive study of how TVA will meet the demand for electricity in its service territory over the next 20 years. The 2019 IRP recommends solar expansion and anticipates growth in all scenarios analyzed. TVA has entered into a power purchase agreement (PPA) with SR Tullahoma LLC (SR Tullahoma), a subsidiary of Silicon Ranch Corporation, to purchase 200 MW AC of power generated by the Project. This PPA will help TVA meet immediate needs for additional renewable generating capacity in response to customer demands and help fulfill the renewable energy goals established in the 2019 IRP. The PPA is contingent upon the completion of an environmental review. The purpose of this is to

address the potential environmental effects associated with constructing, operating, maintaining, and decommissioning the solar PV facility on the project site in Moore County.

The EIS will assess a No Action Alternative and an Action Alternative. The Action Alternative would execute the PPA to purchase 200 MW AC of power generated by the proposed facility. SR Tullahoma would construct, operate, maintain, and eventually decommission a 200-MW AC solar PV facility, as described above, within a footprint that avoids environmental resources to the maximum extent possible. Under the No Action Alternative, TVA would not execute the PPA, and SR Tullahoma would not develop, operate, maintain, or decommission a solar PV facility at this location.

The National Environmental Policy Act (NEPA) requires federal agencies to consider the potential environmental consequences of their proposed actions. An EIS should provide full and fair discussion of significant environmental impacts and should inform decision makers and the public of reasonable alternatives that would avoid or minimize adverse impacts. TVA initiated a 30-day public scoping period on May 3, 2021, when it published a Notice of Intent in the *Federal Register* announcing its plan to prepare an EIS or an environmental assessment (EA). During the scoping period, from May 3, 2021, to June 4, 2021, the public provided input to help TVA identify issues of concern and to help lay the foundation for development of the EIS or EA.

Based on the scoping comments that TVA received, as well as the results of ongoing field surveys and other considerations, TVA decided

Scoping Report Executive Summary

that the appropriate level of review for the Project is an EIS. This scoping report presents the public comments received, as well as information on how the EIS is being developed.

During the scoping period, TVA received comments from two federal agencies, one state agency, one non-governmental organization, and two private individuals. Comments were related

to purpose and need, agency coordination, alternatives, mitigation measures, land use, water resources, biological resources, air quality and greenhouse gas (GHG) emissions, socioeconomics, and environmental justice. This scoping report also includes information about NEPA, federal and local laws, and executive orders that are relevant to the proposed action.

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- Appendix A – *Federal Register* Notice of Intent
- Appendix B – National Historic Preservation Act Initial Section 106 Coordination
- Appendix C – Public and Agency Comments

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AC	Alternating current
BMP	Best management practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DC	Direct current
EA	Environmental assessment
EIS	Environmental impact statement
EO	Executive Order
GHG	Greenhouse gas
IRP	Integrated Resource Plan
kV	Kilovolt
MVT	Mid-voltage transformer
MW	Megawatt
NEPA	National Environmental Policy Act
NOI	Notice of Intent
PPA	Power purchase agreement
PV	Photovoltaic
RFP	Request for proposal
ROW	Right-of-way
SR	Silicon Ranch
SWPPP	Stormwater Pollution Prevention Plan
TDEC	Tennessee Department of Environment & Conservation
THC	Tennessee Historical Commission
TL	Transmission line
TVA	Tennessee Valley Authority
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
U.S.	United States

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1 Introduction

Tennessee Valley Authority (TVA) is a self-financed, wholly owned corporate agency of the United States that serves a region that consists of parts of seven Southeastern states. As a public power entity, TVA has no shareholders and receives no tax dollars. Under the TVA Act of 1933, as amended, Congress charged TVA with advancing the social and economic well-being of the residents of the Tennessee Valley region.

TVA produces or obtains electricity from a diverse portfolio of energy sources, including solar, hydroelectric, wind, biomass, fossil fuel, and nuclear. In June 2019, TVA completed the final 2019 Integrated Resource Plan (IRP) and associated Environmental Impact Statement (EIS). The IRP is a comprehensive study of how TVA will meet the demand for electricity in its service territory over the next 20 years. The target supply mix adopted by TVA in the 2019 IRP recommends solar expansion in all scenarios analyzed, with most scenarios anticipating 5,000-8,000 MW and one anticipating up to 14,000 MW by 2038.

Customer demand for cleaner energy prompted TVA to release a Request for Proposal (RFP) for renewable energy resources in 2020. As an outcome of this RFP process, TVA entered into a power purchase agreement (PPA) with SR Tullahoma LLC (SR Tullahoma), a subsidiary of Silicon Ranch Corporation, to purchase 200 megawatts (MW) alternating current (AC) of power generated by the proposed solar photovoltaic (PV) facility contingent upon the completion of an environmental review. The facility, known as Moore County Solar, would be located within an approximately 3,463-acre project site in Moore County, Tennessee. SR

Tullahoma would construct, operate, maintain, and eventually decommission Moore County Solar. A substation and facilities to interconnect the solar PV facility to the TVA Franklin-Wartrace No. 2 161-kilovolt (kV) transmission line (TL), as well as upgrades on approximately 9.6 miles of this TL, would also be required to operate the solar facility. Together, the solar facility and the TL upgrades are referred to herein as the Project.

The project site consists of 3,463 acres, of which approximately 2,000 acres would be necessary to develop the solar facility. The project site is bisected by State Route 55 and is within the metropolitan limits of Lynchburg, Tennessee. The site is mostly forested, with areas of wetlands, croplands, and early successional fields. TVA's Franklin-Wartrace No. 2 161- kV TL extends north-south through the project site.

TVA initiated the public scoping process for the Project with the publication of a notice of intent (NOI) in the *Federal Register* on May 3, 2021. In the NOI, TVA stated that it was initiating the preparation of either an EIS or an environmental assessment (EA) to address the potential environmental impacts of the Project. Through the NOI and other public notices, TVA requested comments on the scope of the environmental review and environmental issues that should be addressed. TVA also requested data, information, and analyses relevant to the proposed action.

Based on the scoping comments that TVA received, as well as the site size, results of ongoing field surveys, and a preliminary determination of anticipated environmental impacts on natural resources, TVA determined that the appropriate level of review is an EIS.

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TVA is preparing the subject EIS to assess the potential environmental effects associated with

constructing, operating, maintaining, and decommissioning the Project.

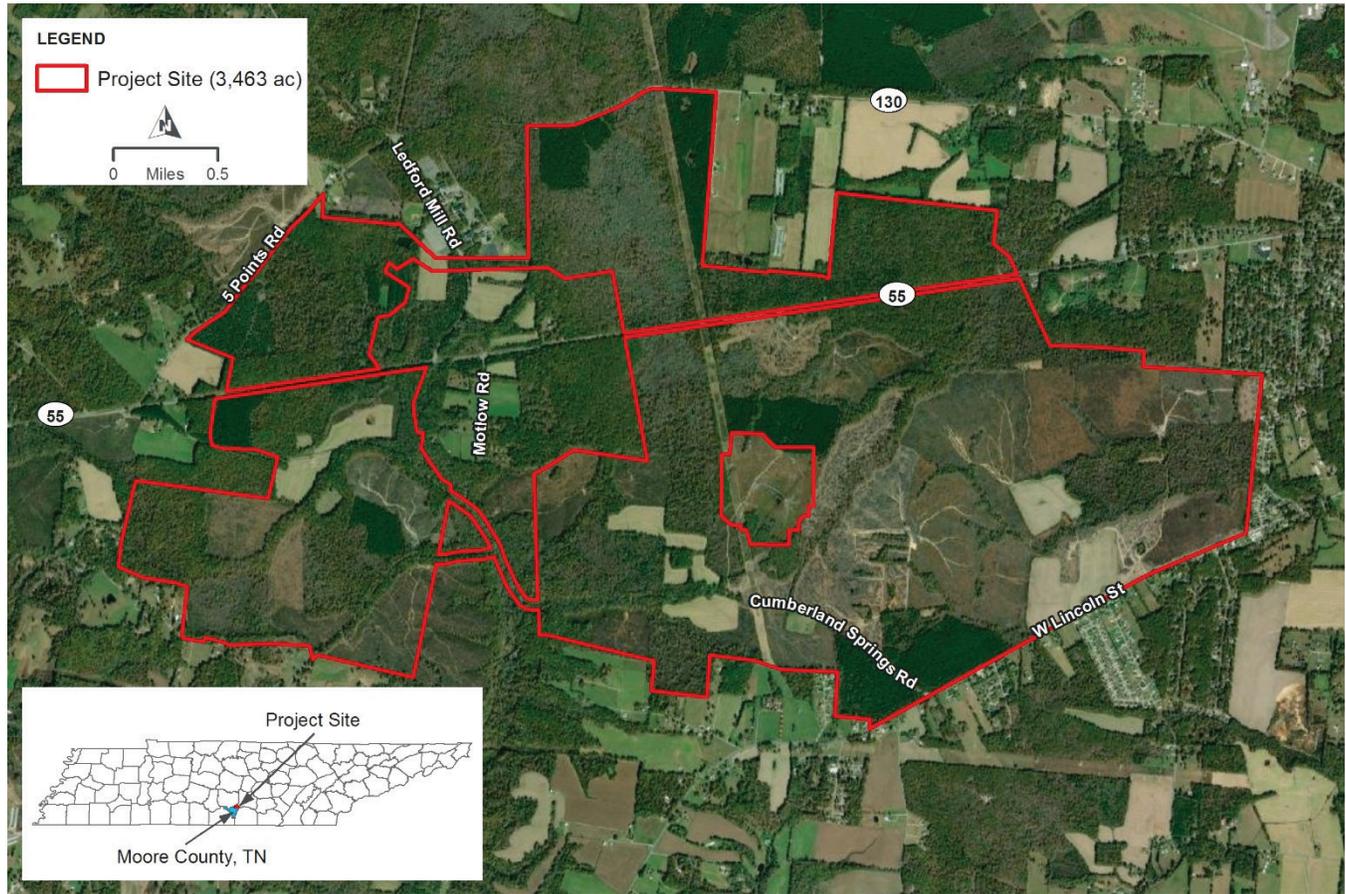


Figure 1. Project Site Location.

2 Purpose and Need

Customer demand for cleaner energy prompted TVA to release an RFP for renewable energy resources (2020 Renewable RFP). The PPA associated with the Project that resulted from this RFP will help TVA meet immediate needs for additional renewable generating capacity in response to customer demands and fulfill the renewable energy goals established in the 2019 IRP. The proposed action would provide cost-effective renewable energy consistent with the IRP and TVA goals.

3 Alternatives

As a result of preliminary internal scoping by TVA and comments received during public scoping, TVA has determined that, from the standpoint of the National Environmental Policy Act (NEPA), there is one reasonable alternative, the Action Alternative, which meets the purpose and need. As required by NEPA, the EIS will also address the No Action Alternative. Variations of the Action Alternative that TVA considered but eliminated from detailed study will be described in the EIS.

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3.1 No Action Alternative

Under the No Action Alternative, TVA would not execute the PPA, and SR Tullahoma would not develop, operate, maintain, and decommission Moore County Solar. Existing conditions (land use, natural resources, visual resources, physical resources, and socioeconomics) on the project site and in the vicinity would remain unchanged. TVA would continue to rely on other sources of generation described in the 2019 IRP to ensure an adequate energy supply and to meet its goals for increased renewable energy and low greenhouse gas (GHG)-emitting generation.

3.2 Action Alternative

Under the Action Alternative, TVA would execute the PPA to purchase 200 MW AC of power generated by the proposed solar PV facility. The facility would be located within the approximately 3,463-acre project site (Figure 1). SR Tullahoma would construct, operate, maintain, and decommission the solar facility within a 2,000-acre footprint that avoids cultural, biological, and physical resources to the maximum extent possible. During the operation of the solar facility, SR Tullahoma would maintain a herd of sheep on the facility site to help control the growth of tall vegetation and reduce mowing needs. The Project would connect to TVA's existing adjacent Franklin-Wartrace No. 2 161-kV TL that extends north-south through the project site. To interconnect to TVA's existing electrical grid, TVA would build an on-site 161-kV substation, if necessary, and replace the existing overhead ground wire with new fiber-optic overhead ground wire along an approximately 9.6-mile portion of the Franklin-Wartrace No. 2 161-kV TL (Figure 2).

The Project would convert sunlight into direct current (DC) electrical energy within PV panels (modules). PV power generation is the direct conversion of light into electricity at the atomic level. Some materials exhibit a property known as the photoelectric effect that causes them to absorb photons of light and release electrons. When these free electrons are captured, an electric current is produced, which can be used as electricity.

The Project would be composed of PV modules mounted together in arrays. Groups of panels would be connected electrically in series to form "strings" of panels, with the maximum string size chosen to ensure that the maximum inverter input voltage is not exceeded by the string voltage at the Project's high design temperature. The panels would be arranged in individual blocks consisting of the PV arrays and an inverter station on a concrete pad or steel piles, to convert the DC electricity generated by the solar panels into AC electricity. Each inverter would be collocated with a mid-voltage transformer (MVT), which would step-up the AC voltage to minimize the AC cabling electrical losses between the central inverters and the proposed on-site 161-kV substation. Underground AC power cables would connect the MVTs to a single main power transformer, located within the substation. The arrays and inverter block areas would be enclosed by chain-link security fencing. The portions of the project site outside the fenced-in areas would not be developed.

The modules would be attached to single-axis trackers. The axis trackers would be attached to steel pile foundations and pivot the panels along their north-south axes to follow the path of the sun from the east to the west across the sky.

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Other temporary or permanent Project components would include construction laydown areas, buildings, and security and communications equipment. Also, if determined necessary, the Project may include water wells

and a septic system or a pump-out septic holding tank. Compacted gravel access roads would provide access to each inverter block, the substation, and to any buildings.

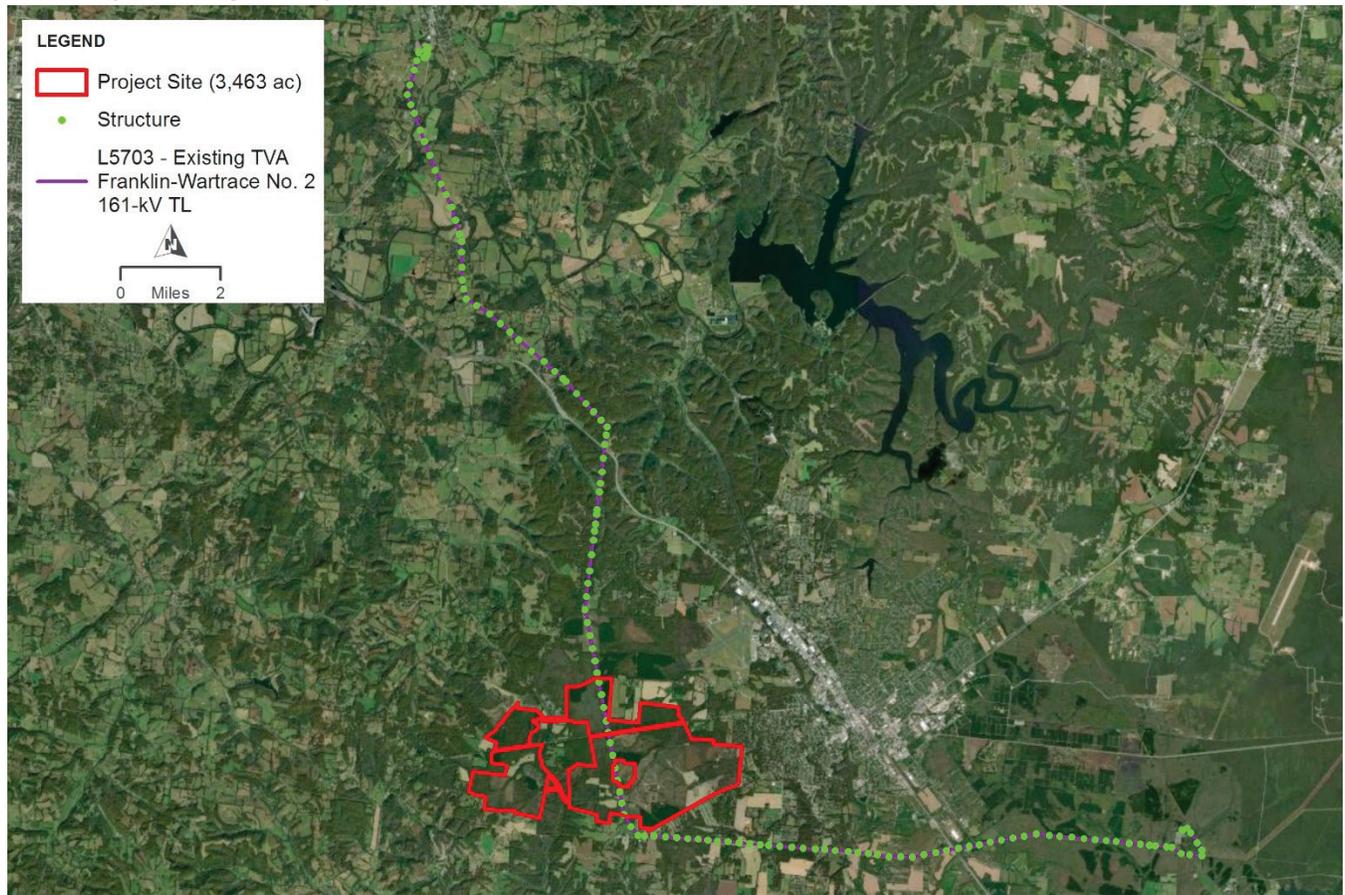


Figure 2. Entire Franklin-Wartrace No. 2 161-kV TL

4 Environmental Review Process

NEPA requires federal agencies to consider and study the potential environmental consequences of their proposed actions. Actions, in this context, can include new and continuing activities that are conducted, financed, assisted, regulated or approved by federal agencies, as well as new or revised plans, policies, or procedures. An EIS should provide full and fair discussion of significant environmental impacts

and should inform decision makers and the public of reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment.

TVA is initiating the preparation of an EIS to assess the environmental impacts of the proposed action. TVA is using the input from the public scoping period in developing the Draft EIS. The Draft EIS will be posted on TVA’s website and distributed to interested federal, state, and local agencies, individuals, and groups, including

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scoping participants, for their review and comment. Following this public comment period, TVA will respond to the comments received and incorporate any necessary changes into the Final EIS. TVA will make a final decision regarding the proposed action no sooner than 30 days after the Final EIS is published.

The completed Final EIS will be posted on TVA’s website, and notices of its availability will be sent to those who received the Draft EIS or submitted comments on the Draft EIS. TVA intends to publish the Draft EIS in early 2022 and publish the Final EIS by mid-2022.

4.1 Applicable Federal Laws and Executive Orders

4.1.1 National Environmental Policy Act

This EIS is being prepared by TVA in accordance with NEPA (42 United States Code

§§ 4321 et seq.), regulations implementing NEPA promulgated by the Council on Environmental Quality (40 CFR Parts 1500 to 1508), and TVA NEPA regulations (18 CFR 1318) and procedures.

4.1.2 Other Laws and Executive Orders

Other laws and Executive Orders (EOs) are relevant to the proposed action (Table 1). These laws and orders may affect the environmental consequences of the solar PV facility or represent mitigation measures to implement during its construction, operation, or decommissioning. The Draft EIS will describe the regulatory setting for each environmental resource in more detail.

Table 1. Laws and Executive Orders relevant to the Proposed Action.

Environmental Resource Area	Law / Executive Order
Prime Farmland	Farmland Protection Policy Act
Water Resources	Clean Water Act EO 11988 – Floodplain Management EO 11990 – Protection of Wetlands Resource Conservation and Recovery Act Safe Drinking Water Act
Biological Resources	Bald and Golden Eagle Protection Act Endangered Species Act EO 13112 – Invasive Species EO 13186 – Responsibilities of Federal Agencies to Protect Migratory Birds Migratory Bird Treaty Act
Air Quality and GHG Emissions	Clean Air Act

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Environmental Resource Area	Law / Executive Order
Cultural Resources	National Historic Preservation Act Native American Graves Protection and Repatriation Act
Solid and Hazardous Waste	Comprehensive Environmental Response, Compensation, and Liability Act Emergency Planning and Community Right-to-Know Act Resource Conservation and Recovery Act Solid Waste Disposal Act Toxic Substances Control Act
Public and Occupational Health and Safety	Occupational Safety and Health Act
Environmental Justice	EO 12898 – Federal Actions to Address Environmental Justice in Minority and Low-Income Populations

4.2 Environmental Resources to Be Considered in EIS

Based on internal and public scoping, identification of applicable laws, regulations, executive orders, and policies, TVA identified the following resource areas as requiring review within the EIS:

- Land Use
- Geology, Soils, and Prime Farmland
- Water Resources
 - Groundwater
 - Surface Water and Wetlands
 - Floodplains
- Biological Resources
 - Vegetation
 - Wildlife
 - Aquatic Life
 - Threatened and Endangered Species
- Natural Areas, Parks, and Recreation
- Visual Resources
- Noise
- Air Quality and GHG Emissions
- Cultural Resources
- Utilities
- Solid and Hazardous Waste Management
- Public Health and Safety
- Transportation
- Socioeconomics
- Environmental Justice

5 Public and Agency Outreach

On May 3, 2021, TVA published a Notice of Intent (NOI) in the *Federal Register* announcing that it planned to prepare either an EIS or an EA to assess the potential environmental effects associated with constructing, operating, maintaining, and decommissioning the Project (Appendix A). The NOI initiated a 30-day public scoping period, which concluded on June 4, 2021. The NOI solicited public input on both the scope of the EIS or EA and the environmental

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issues that should be considered in the EIS or EA. It also requested data, information, and analyses relevant to the proposed action.

In addition to the NOI in the *Federal Register*, TVA sent notification of the NOI to local and state government entities and federal agencies, issued a Project news release in *Moore County News*, and posted the news release on the TVA website. TVA sent the scoping notice via email to agencies and organizations.

As part of its National Historic Preservation Act compliance responsibilities, TVA initiated consultation with federally recognized tribes and the Tennessee Historical Commission (THC), which functions as the Tennessee State Historic Preservation Office, in April 2021 (Appendix B).

6 Response to Public Scoping

During the scoping period, comments were received from the U.S. Geological Survey; U.S. Environmental Protection Agency (USEPA); Tennessee Natural Heritage Program, part of the Tennessee Department of Environment and Conservation (TDEC); Southeastern Grasslands Initiative; and two private individuals. Comments were related to purpose and need, agency coordination, alternatives, mitigation measures, land use, water resources, biological resources, air quality and GHG emissions, socioeconomics, and environmental justice. Comment summaries and full submissions, along with TVA's responses, are included in Appendix C, and summarized in this section. Mitigation measures are presented in Section 7, including those related to the scoping comments.

6.1 Scope of the EIS

TVA will analyze the potential adverse and beneficial impacts related to the construction, operation, maintenance, and decommissioning of the Project. TVA will also analyze the potential impacts related to the associated modifications to the TVA transmission system. In addition to the environmental resources listed in Section 4.2, TVA will analyze the cumulative impacts of the Project with consideration of any reasonably foreseeable actions and other anticipated changes in the vicinity of the project site during the operation of the solar facility. TVA will also describe how the Project would provide cost-effective renewable energy consistent with the 2019 IRP and TVA goals.

6.2 Response to Scoping Comments

Comments were received regarding several topics. A brief summary of TVA's response or planned approach to these items in the EIS is presented by topic below.

Purpose and Need

In planning its energy portfolio in the 2019 IRP, TVA considered the intermittent availability of solar generation and is compensating for this by operating a diverse portfolio of types of generation, an adequate reserve margin to compensate for the loss of individual generating facilities, and a well-maintained interconnected transmission grid.

Agency Coordination

The Project is coordinating with TDEC and U.S. Army Corps of Engineers (USACE) on the surface water resources identified on the project site and will do so for the TL upgrade locations, as well.

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TVA will provide notice to potentially interested state and federal agencies when the Draft EIS is available for review and comment.

Alternatives

In its 2019 IRP EIS, TVA considered land use efficiency of solar energy development in the TVA region and ultimately recommended the expansion of solar generating capacity. TVA will evaluate dual use of the project site as a solar facility and a commercial sheep operation in the EIS.

Silicon Ranch Corporation reviewed other sites prior to selecting the project site. Part of the screening process included a review of interconnection options, including key entry points to the TVA transmission system. The project site in Moore County stood out as a viable option for transmission system connectivity. The EIS will describe the site selection process completed during Project planning.

Mitigation Measures

If needed, the Project will consider environmental conservation and enhancement efforts, in coordination with state and federal agencies, as potential mitigation measures.

Water Resources

TVA will evaluate potential impacts to surface waters, as well as to floodplains, stormwater, and other water resources in the EIS.

Biological Resources

TVA compiled lists of rare plants and animals from TDEC, as well as from the U.S. Fish and Wildlife Service and TVA's Regional Natural Heritage Database, for the Project area. TVA will evaluate potential impacts to biological resources

in the EIS. This evaluation will include detailed field surveys of biological resources, including the presence of rare plants and animals, suitable habitat for the rare species, and rare natural communities.

Air Quality and GHG Emissions

TVA will evaluate potential air quality and GHG emissions impacts in accordance with NEPA requirements as reflected in current regulations and recent Council on Environmental Quality guidance. This analysis will include the Project effects on carbon sequestration.

Socioeconomics

TVA will evaluate potential impacts to employment in the EIS. TVA will consider how reduced energy costs from solar may be relevant to the socioeconomic analysis presented in the EIS.

Environmental Justice

TVA will evaluate potential impacts to minority and low-income populations in the EIS in accordance with EO 12898 and associated CEQ and USEPA guidance. TVA will also comply with EO 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable in the Project area, in public notifications for the Project.

7 Potential Mitigation Measures

TVA and SR Tullahoma would implement minimization and mitigation measures in relation to resources potentially affected by the Project. These would be developed with consideration to best management practices (BMPs), permit requirements, and adherence to the Stormwater Pollution Prevention Plan (SWPPP).

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In association with the proposed electrical interconnection, TVA would employ standard practices and specific routine measures to avoid and minimize impacts to resources. Some comments received during the scoping period offered specific mitigation measures for the proposed action. During development of the EIS, TVA will consider implementation of the following minimization and mitigation measures in relation to potentially affected resources.

Visual Resources

Use timer- and/or motion-activated downward facing lighting to limit visual effects at night.

Soils

Install silt fence along the perimeter of vegetation-cleared areas, implement other soil stabilization and vegetation management measures to reduce the potential for soil erosion during site operations, and make an effort to balance cut-and-fill quantities to alleviate the transportation of soils offsite during construction.

Water Resources

Comply with the terms of the SWPPP prepared as part of the National Pollutant Discharge Elimination System permitting process; use BMPs for controlling soil erosion and runoff, such as the use of buffer zones surrounding perennial and intermittent streams as well as wetlands and natural ponds and the installation of erosion control silt fences and sediment traps; and implement other routine BMPs as necessary, such as non-mechanical tree removal within surface water buffers, placement of silt fence and sediment traps along buffer edges, selective herbicide treatment to restrict application near receiving water features, and proper vehicle maintenance to reduce the potential for adverse

impacts to surface water and groundwater.

Impacts to water resources deemed jurisdictional to TDEC and USACE would be permitted in compliance with the Clean Water Act Sections 401 and 404. The Project would also implement mitigation measures as defined in TVA's 1981 *Class Review of Repetitive Actions in the 100-Year Floodplain*, if needed.

Biological Resources

Revegetate with native and/or noninvasive vegetation, including plants attractive to pollinators, to reintroduce habitat, reduce erosion, limit the spread of invasive species (per EO 13112 (Invasive Species)); follow U.S. Fish and Wildlife recommendations regarding biological resources, including pollinator species; avoid, to the extent practicable, siting generation equipment and associated infrastructure in areas that support state-listed plant species and rare plant habitats; use timer- and/or motion-activated downward facing lighting to limit attracting wildlife, particularly migratory birds and bats; instruct personnel on wildlife resource protection measures, including applicable federal and state laws such as those that prohibit animal disturbance, collection, or removal, the importance of protecting wildlife resources, and avoiding plant disturbance; and use only USEPA-registered and TVA-approved herbicides in accordance with label directions designed, in part, to restrict applications near receiving waters and to prevent unacceptable aquatic impacts.

Solid and Hazardous Waste Management

Develop and implement a variety of plans and programs to ensure safe handling, storage, and use of hazardous materials.

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Public Health and Safety

Implement BMPs for site safety management to minimize potential risks to workers.

Transportation

Implement a traffic management plan to manage construction traffic flow near the project site.

Noise

Limit construction activities primarily to daytime hours and ensure that heavy equipment, machinery, and vehicles utilized at the project site meet all federal, state, and local noise requirements.

Air Quality and GHG Emissions

Comply with local ordinances or burn permits if burning of vegetative debris is required and use BMPs such as periodic watering, covering open-body trucks, and establishing a speed limit to mitigate fugitive dust.



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*Appendix A – Federal
Register Notice of Intent*



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TENNESSEE VALLEY AUTHORITY

Moore County Solar Project

AGENCY: Tennessee Valley Authority.

ACTION: Notice of Intent; request for comments.

SUMMARY: The Tennessee Valley Authority (TVA) intends to prepare an environmental impact statement (EIS) or environmental assessment (EA) for the purchase of electricity generated by the proposed Moore County Solar Project in Moore County, Tennessee. The EIS or EA will assess the potential environmental effects of constructing, operating, and maintaining the proposed 200-megawatt (MW) alternating current (AC) solar facility. The proposed 200 MW AC solar facility would occupy approximately 2,000 acres of the roughly 3,300-acre Project Study Area. Public comments are invited concerning both the scope of the environmental review and environmental issues that should be addressed in the EIS or EA. TVA is also requesting data, information, and analysis relevant to the proposed action from the public; affected federal, state, tribal, and local governments, agencies, and offices; the scientific community; industry; or any other interested party.

DATES: To ensure consideration, comments must be postmarked, emailed, or submitted online no later than June 4, 2021.

ADDRESSES: Written comments should be sent to Ashley Pilakowski, NEPA Specialist, Tennessee Valley Authority, 400 West Summit Hill Drive, WT 11B, Knoxville, Tennessee 37902. Comments may be submitted online at: www.tva.gov/nepa, or by email to nepa@tva.gov. Please note that, due to current TVA requirements for many employees to work remotely, comments submitted electronically are encouraged.

FOR FURTHER INFORMATION CONTACT: Ashley Pilakowski by email at aapilakowski@tva.gov, by phone at (865) 632-2256, or by mail at the address above.

SUPPLEMENTARY INFORMATION: This notice is provided in accordance with the Council on Environmental Quality's regulations 40 CFR Parts 1500 to 1508 (84 FR 43304, July 16, 2020) and TVA's procedures for implementing the National Environmental Policy Act (NEPA) at 18 CFR Part 1318, as well as Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). Following site investigations and a preliminary determination of the anticipated environmental impacts, TVA will decide whether the proposed action will be the subject of an EIS or EA.

TVA is a federal agency and instrumentality of the United States, created in 1933 by an act of Congress to foster the social and economic well-being of the residents of the Tennessee Valley region. As part of its diversified energy strategy, TVA produces or obtains electricity from a diverse portfolio of energy sources, including solar, hydroelectric, wind, biomass, fossil fuel, and nuclear.

Background

In June 2019, TVA completed the final 2019 Integrated Resource Plan (IRP) and associated EIS. The IRP is a comprehensive study of how TVA will meet the demand for electricity in its service territory over the next 20 years. The 2019 IRP recommends solar expansion and anticipates growth in all scenarios analyzed, with most scenarios anticipating 5,000-8,000 MW and one anticipating up to 14,000 MW by 2038. Customer demand for cleaner energy prompted TVA to release a Request for Proposal (RFP) for renewable energy resources (2020 Renewable RFP). The Moore County Solar Project power purchase agreement (PPA) that resulted from this RFP will help TVA meet immediate needs for additional renewable generating capacity in response to customer demands and fulfill the renewable energy goals established in the 2019 IRP.

TVA has entered into a PPA with Silicon Ranch Corporation to purchase 200 MW AC of power generated by the proposed Moore County Solar Project, hereafter referred to as the project. The proposed 200 MW AC solar facility would occupy approximately 2,000 acres of the roughly 3,300-acre Project Study Area which is located entirely in Moore County, Tennessee. The project site is bisected by State Route 55 and its eastern boundary borders the western city limits of Tullahoma, Tennessee. The project site is mostly forested with areas of wetlands, croplands, and early successional fields. A TVA 161-kilovolt transmission line runs north-south through the site. A map showing the project site is available at www.tva.gov/nepa.

Preliminary Proposed Action and Alternatives

In addition to a No Action Alternative, TVA will evaluate the action alternative of purchasing power from the proposed Moore County Solar Project. In evaluating alternatives, TVA considered other solar proposals, prior to selecting the Moore County site. Part of the screening process included a review of transmission options, including key connection points to TVA's transmission system. The Moore County site stood out as a viable option for connectivity. For the proposed site, the solar developer plans to consider the establishment of a reduced footprint so that impacts to cultural and/or biological resources could be avoided. The EIS or EA will also evaluate ways to mitigate impacts that cannot be avoided. The description and analysis of these alternatives in the EIS or EA will inform decision makers, other agencies, and the public about the potential for environmental impacts associated with the proposed solar facility. TVA solicits comments on whether there are other alternatives that should be assessed in the EIS or EA.

Brief Summary of Expected Impacts

Public scoping is integral to the process for implementing NEPA and ensures that (1) issues are identified early and properly studied, (2) issues of little significance do not

consume substantial time and effort, and (3) the analysis of identified issues is thorough and balanced. This EA or EIS will identify the purpose and need of the project and will contain descriptions of the existing environmental and socioeconomic resources within the area that could be affected by the proposed solar facility, including the documented historical, cultural, and environmental resources. Evaluation of potential environmental impacts to these resources will include, but not be limited to, air quality and greenhouse gas emissions, surface water, groundwater, wetlands, floodplains, vegetation, wildlife, threatened and endangered species, land use, natural areas and parks and recreation, geology, soils, prime farmland, visual resources, noise, cultural resources, socioeconomics and environmental justice, solid and hazardous waste, public and occupational health and safety, utilities, and transportation.

Based on a preliminary evaluation of these resources, TVA expects potential impacts to vegetation and wildlife due to the conversion of coniferous and hardwood forests of various ages to early maintained grass-dominated fields. Impacts to water resources would likely be minor with the use of best management practices and avoidance of siting project components in or near streams, wetlands, and riparian areas to the extent feasible. Land use would be impacted by the conversion of the undeveloped site to industrial use and the elimination of current farming and timber operations. This would also result in visual impacts. The current recreational uses of the site, primarily hunting, would also be eliminated. Historic properties could be impacted but would be avoided to the extent feasible or mitigated in compliance with applicable regulations. Nearly half of the site was once used as an auxiliary training area for the U.S. Army during World War II. The site was deactivated in 1946 and the U.S. Army Corps of Engineers has conducted numerous inspections and remediation efforts on the former Motlow Range to ensure public and occupational health and safety. Beneficial impacts are expected by facilitating the development of renewable energy and thereby increasing local job opportunities, as

well as improving regional air quality and reducing carbon emissions. The EIS or EA will analyze measures that would avoid, minimize, or mitigate environmental effects. The final range of issues to be addressed in the environmental review will be determined, in part, from scoping comments received.

Request for Identification of Potential Alternatives, Information, and Analyses

Relevant to the Proposed Action

TVA requests assistance with identifying any new potential alternatives to the proposed action to be considered. TVA also requests assistance with identifying any new potential impacts of the proposed action, identifying the activity and the potential impact that should be analyzed. Information interested parties possess which would assist in the analysis of resources issues is also appreciated. TVA is particularly interested in public input on other reasonable alternatives that should be considered in the EIS or EA. The preliminary identification of reasonable alternatives, information, and analyses relevant to the proposed action in this notice is not meant to be exhaustive or final.

Public Participation

The public is invited to submit comments on the scope of this EA or EIS no later than the date identified in the **DATES** section of this notice. Federal, state, and local agencies and Native American Tribes are also invited to provide comments. Information about this project is available on the TVA web page at www.tva.gov/nepa, including a link to an online public comment page. Any comments received, including names and addresses, will become part of the administrative record and will be available for public inspection. After consideration of comments received during the scoping period, TVA will develop and distribute a scoping document that will summarize public and agency comments that were received and identify the schedule for completing the EIS or EA process. Following analysis of the issues, TVA will prepare the draft EIS or EA for public review and comment; expected to be released late 2021 or early 2022. TVA anticipates the final EIS

or EA in summer of 2022. In finalizing the EIS or EA and in making its final decision, TVA will consider the comments that it receives on the draft.

Rebecca Tolene,

Vice President,

Environment.

[FR Doc. 2021-09223 Filed: 4/30/2021 8:45 am; Publication Date: 5/3/2021]

A large, dark blue, serif letter 'B' is positioned on the right side of the page. It is partially overlaid by a grey rectangular block above it and a dark blue rectangular block to its left. Below the letter is a thin horizontal line.

Appendix B – National
Historic Preservation Act
Initial Section 106
Coordination

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400 West Summit Hill Drive, Knoxville, Tennessee 37902

April 29, 2021

Mr. E. Patrick McIntyre, Jr.
Executive Director
and State Historic Preservation Officer
Tennessee Historical Commission
2941 Lebanon Road
Nashville, Tennessee 37243-0442

Dear Mr. McIntyre:

TENNESSEE VALLEY AUTHORITY (TVA) POWER PURCHASE AGREEMENT (PPA)
MOORE COUNTY SOLAR ARRAY MOORE COUNTY, TENNESSEE (TVA TRACKING
NUMBER – CID 80060) (35.350211 -86.269295)

TVA is proposing to enter into a PPA with Silicon Ranch Tullahoma, LLC (SR Tullahoma) for a 200 megawatts solar photovoltaic (PV) generating facility located near Tullahoma, in Moore County, Tennessee (Figure 1)The facility would be located on an assemblage of parcels making up approximately3,312-acres. A portion of the study area is a pine plantation and actively logged. In addition, much of the property is the former Motlow Artillery Range, which was used by the Army during World War II (Figure 2). TVA proposes that the area of potential effects (APE) should be considered to be the footprint where ground disturbance could occur as a result of the undertaking including the proposed solar arrays and any supporting infrastructure as well as the 0.5 mile radius of the project area and within the visual line of site that may have a visual effect to historic properties.

SR Tullahoma contracted with New South Associates, Inc. (New South) to conduct a Phase I Cultural Resources survey. For your review, please find the proposed research design for the Phase I Cultural Resources survey, prepared by New South enclosed. Pursuant to 36 CFR § 800.4(b)(1), TVA finds that the survey design presented here is a reasonable and good faith effort to carry out identification efforts.

By this letter, TVA is initiating consultation regarding the proposed undertaking. TVA is proposing to conduct Phase I Cultural Resources survey of the APE as described in the enclosed scope of work.

Pursuant to 36 CFR Part 800.3(f)(2), TVA is consulting with federally recognized Indian tribes regarding historic properties within the proposed project's APE that may be of religious and cultural significance and are eligible for the National Register of Historic Places.

Mr. E. Patrick McIntyre, Jr.
Page 2
April 29, 2021

If you have any questions or comments, please contact Michaelyn Harle by email at mharle@tva.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Clint E. Jones".

Clinton E. Jones
Manager
Cultural Compliance

MSH:ABM
Enclosures

cc (Enclosures):

Ms. Jennifer Barnett
Tennessee Division of Archaeology
1216 Foster Avenue, Cole Bldg. #3
Nashville, Tennessee 37210

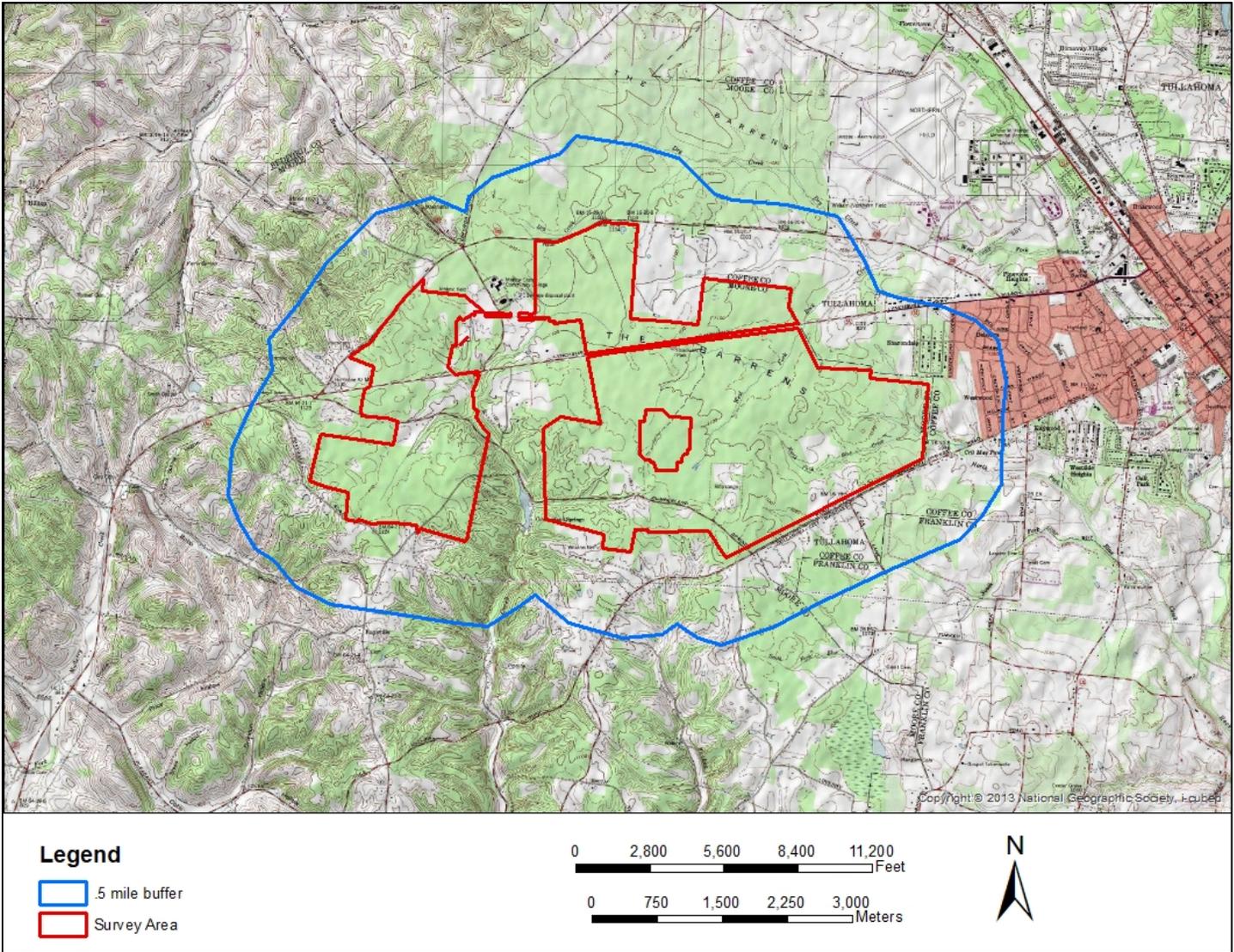


Figure 1. Location of the proposed solar array with 0.5-mile buffer.

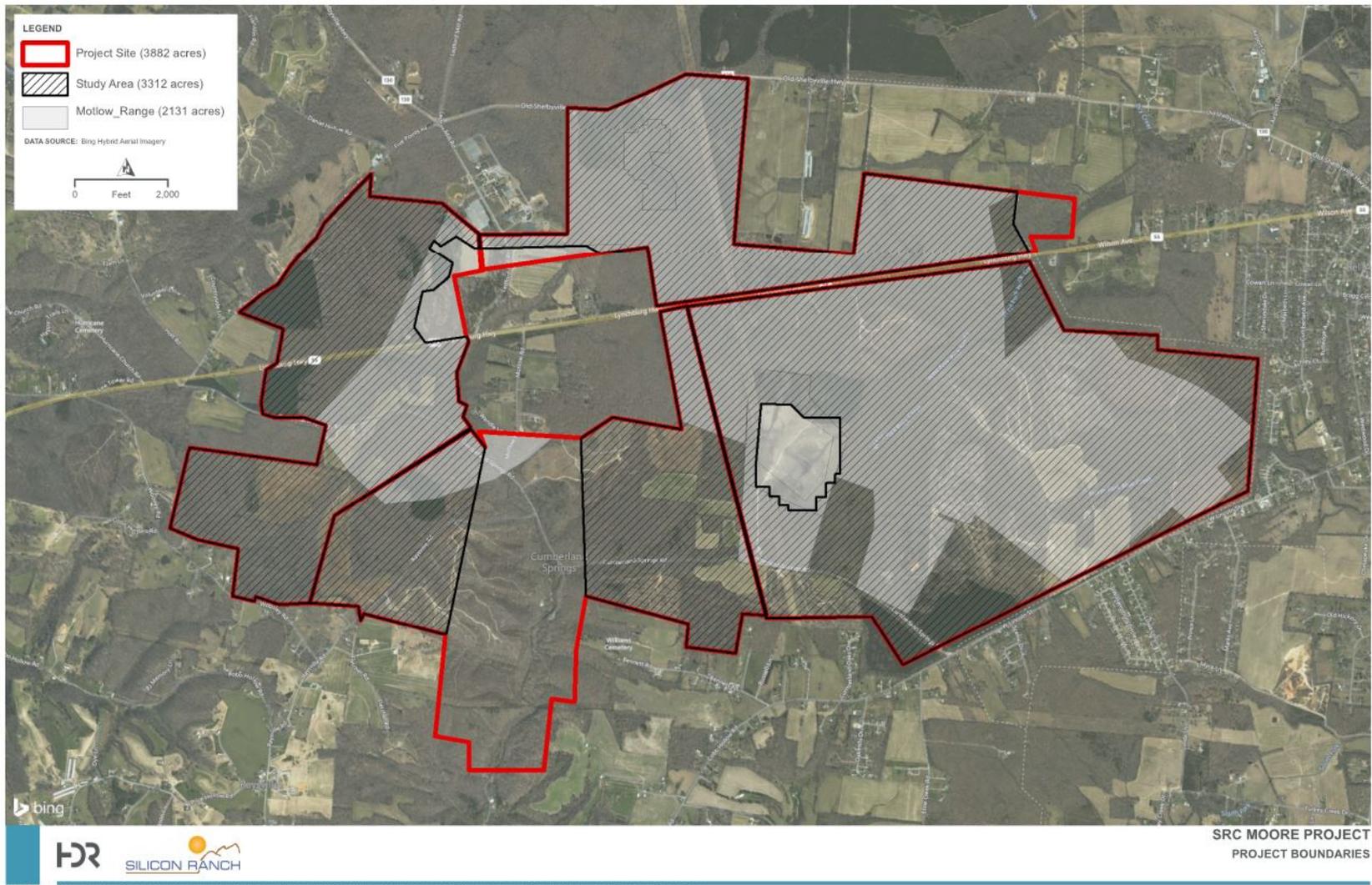


Figure 2: Aerial depicting the survey area and the location of the former Motlow Artillery Range



TENNESSEE HISTORICAL COMMISSION
STATE HISTORIC PRESERVATION OFFICE
2941 LEBANON PIKE
NASHVILLE, TENNESSEE 37243-0442
OFFICE: (615) 532-1550
www.tnhistoricalcommission.org

April 29, 2021

Mr. Clinton E. Jones
Tennessee Valley Authority
Biological and Cultural Compliance
400 West Summit Hill Drive
Knoxville, TN 37902

RE: TVA / Tennessee Valley Authority, Purchase Power Agreement, Silicon Ranch
Tullahoma, Moore County Solar Array, Tullahoma Moore County, TN

Dear Mr. Jones:

At your request, our office has reviewed the above-referenced cultural resources survey cope of work. This review is a requirement of Section 106 of the National Historic Preservation Act for compliance by the participating federal agency or applicant for federal assistance. Procedures for implementing Section 106 of the Act are codified at 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Based on the information provided, we find that the proposed survey methods are adequate for the identification of historic properties within the area of potential effect.

Your continued cooperation is appreciated.

Sincerely,

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/jmb

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From: Shuler, Marianne M <mmshuler@tva.gov>

Sent: Friday, April 30, 2021 3:01 PM

Subject: TVA-Moore County Solar Project-Initiation of Consultation-MooreCoTN-CID80060-30Apr2021

Good Afternoon

By this email I am sending the attached initiation of consultation letter regarding TVA's proposal to enter into a power purchase agreement with Silicon Ranch Tullahoma, LLC for a 200 megawatts solar photovoltaic generating facility located near Tullahoma, in Moore County, Tennessee.

Please let me know by May 30 if you have any questions or comments on the proposed undertaking or proposed Phase I survey.

Thanks

Marianne

Due to COVID-19 safety precautions enacted by TVA, I am currently teleworking.

-

Marianne Shuler

Senior Specialist, Archaeologist & Tribal Liaison
Cultural Compliance

Tennessee Valley Authority
400 W. Summit Hill Drive
Knoxville, TN 37902

(865)253-1265 (w)
mmshuler@tva.gov



NOTICE: This electronic message transmission contains information that may be TVA SENSITIVE, TVA RESTRICTED, or TVA CONFIDENTIAL. Any misuse or unauthorized disclosure can result in both civil and criminal penalties. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the content of this information is prohibited. If you have received this communication in error, please notify me immediately by email and delete the original message.

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May 14, 2021

Ms. Marianne Shuler, Senior Specialist,
Archaeologist & Tribal Liaison
Cultural Compliance
Tennessee Valley Authority
400 W. Summit Hill Drive
460 WT 7D-K
Knoxville, TN 37902

Dear Ms. Shuler:

Thank you for the research design and a letter initiating consultation on a proposed power purchase agreement with Silicon Ranch Tullahoma, LLC for a solar photovoltaic generating facility in Moore County, Tennessee (CID 80060). We accept the invitation to consult under Section 106 of the National Historic Preservation Act.

The Chickasaw Nation concurs that the procedures outlined in the research design should adequately test the area to locate any potential cultural resources in the project area of potential effects. We wish to review the cultural resource report once it is available. In the event the agency becomes aware of the need to enforce other statutes we request to be notified under ARPA, AIRFA, NEPA, NAGPRA, NHPA and Professional Standards.

Your efforts to preserve and protect significant historic properties are appreciated. If you have any questions, please contact Ms. Karen Brunso, tribal historic preservation officer, at (580) 272-1106, or by email at karen.brunso@chickasaw.net.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa John', with a long horizontal flourish extending to the right.

Lisa John, Secretary
Department of Culture and Humanities

Cc: mmshuler@tva.gov

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A large, stylized letter 'C' in a dark blue serif font, positioned to the right of a large vertical bar that is split into a dark blue upper section and a lighter blue lower section.

Appendix C – Public and
Agency Comments

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Comment No.	Document	Topic	Public / Agency Comment	Commenter(s)	TVA Response
1	NOI	Agency Coordination	The US Geological Survey (USGS) has no comment until the EIS is ready for review.	Brett Kopec, US Geological Survey	Comment noted.
2	NOI	General	General support for the project.	Lakshya Bharadwaj	Comment noted.
3	NOI	Purpose and Need	Comment asking whether solar energy is "possible," suggesting it could be devastating in some areas of our daily life and referencing the early February 2021 loss of power in Texas wherein renewable energy was blamed for lack of reliability. Suggestion that people should watch what we put into the atmosphere and that we "repair and reinforce" the current power infrastructure.	Brenda Russell	TVA produces or obtains electricity from a diverse portfolio of energy sources, including solar, hydroelectric, wind, biomass, coal, natural gas, and nuclear. TVA's 2019 Integrated Resource Plan (IRP) identified the various resources that TVA intends to use to meet the energy needs of the TVA region over a 20-year planning period, while achieving TVA's objectives to deliver reliable, low-cost, and cleaner energy with fewer environmental impacts. The 2019 IRP recommends the expansion of solar generating capacity of up to 14,000 megawatts by 2038, as well as expansion or retirement of other existing power infrastructure. The Project would partially fulfill the renewable energy goals established in the 2019 IRP by providing cost-effective renewable energy. In planning its energy portfolio, TVA considered the intermittent availability of solar generation and is compensating for this by operating a diverse portfolio of types of generation, an adequate reserve margin to compensate for the loss of individual generating facilities, and a well-maintained interconnected transmission grid.
4	NOI	Alternatives; NEPA analyses	The US Environmental Protection Agency (EPA) appreciates TVA's efforts toward developing and analyzing an appropriate amount of alternative project proposals. The EPA recommends including details of considered alternatives within the NEPA documents. Please consider using the NEPAassist tool (https://www.epa.gov/nepa/nepassist), in addition to localized data sources and tools, when conducting the NEPA analysis.	Douglas White, US Environmental Protection Agency	Silicon Ranch Corporation reviewed other sites prior to selecting the project site. Part of the screening process included a review of interconnection options, including key entry points to the TVA transmission system. The project site in Moore County stood out as a viable option for connectivity. The EIS will describe the site selection process completed during Project planning.
5	NOI	Air Quality and GHGs; Water Resources	Statement that solar energy emits 95 percent fewer greenhouse gases than energy derived from fossil fuels and has no water requirements.	Lakshya Bharadwaj	Comment noted.

Comment No.	Document	Topic	Public / Agency Comment	Commenter(s)	TVA Response
6	NOI	Air Quality and GHGs	The US Environmental Protection Agency (EPA) recommends that net greenhouse gas (GHG) emissions related to this proposal and TVA's 2019 Integrated Resource Plan be considered in the NEPA analysis. Additionally, this project site is within an attainment area for air quality standards; however, localized impacts to air quality could occur during construction due to equipment exhaust emissions and fugitive dust. The EPA recommends implementing measures to reduce diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies. We also encourage controlling fugitive dust by watering or the application of other controlled materials.	Douglas White, US Environmental Protection Agency	TVA will evaluate potential air quality and GHG emissions impacts in accordance with NEPA requirements as reflected in current regulations and recent Council on Environmental Quality guidance. If warranted, this would include consideration of mitigation measures to reduce diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, and reducing idling through operator training. The Project would ensure vehicles are properly maintained. TVA and SR Tullahoma would comply with local ordinances and the requirements of open-burning permits if open burning of vegetative debris is required and use best management practices such as periodic watering, covering open-body trucks, and establishing a speed limit to mitigate fugitive dust.
7	NOI	Alternatives; Air Quality and GHGs	The proposed action provides TVA an opportunity to study land use efficiency of solar energy development in the Tennessee Valley region. Local climate, ecosystems, and agriculture affect the net benefit of photovoltaic solar infrastructure regarding carbon release and sequestration. The US Environmental Protection Agency (EPA) recommends consideration of dual land use where land use efficiency can be increased (https://www.energy.gov/eere/solar/farmers-guide-going-solar).	Douglas White, US Environmental Protection Agency	In its 2019 Integrated Resource Plan (IRP) EIS, TVA considered land use efficiency of solar energy development in the TVA region (see Sections 5.2.3.5, 5.2.3.6, and 5.5.5) and ultimately recommended the expansion of solar generating capacity. TVA will evaluate dual use of the project site as a solar facility and a commercial sheep operation in the EIS. TVA will evaluate the Project effects to carbon sequestration compared with the No Action Alternative in the EIS.
8	NOI	Surface Water; Floodplains	The proposed action is situated in a predominantly forested area home to interspersed creeks and wetlands. The US Environmental Protection Agency (EPA) recommends that design proposals and construction avoid impacting these Waters of the United States (WOTUS) to the maximum extent practicable by locating permanent proposed infrastructure and temporary construction measures away from WOTUS and respective buffers. WOTUS should be delineated and coordination with the US Army Corps of Engineers (USACE) should be made where proposed activities might enter or affect WOTUS. Flood water mapping should occur to ensure proposed activities do not take place in floodplains except where alternatives are not practicable.	Douglas White, US Environmental Protection Agency	TVA will evaluate potential impacts to wetlands, streams, floodplains, and other water resources in the EIS. The proposed solar facility would be designed to incorporate measures to avoid streams and wetlands, identified by field surveys, to the maximum extent possible. TVA and SR Tullahoma would implement best management practices such as avoidance buffers surrounding surface waters and comply with all terms and conditions of a USACE Nationwide or Individual permit, if needed. TVA and SR Tullahoma would also implement mitigation measures as defined in TVA's 1981 <i>Class Review of Repetitive Actions in the 100-Year Floodplain</i> , if needed.

Comment No.	Document	Topic	Public / Agency Comment	Commenter(s)	TVA Response
9	NOI	Stormwater	The proposed action has the potential to disturb a considerable amount of soil, and a state or county construction stormwater permit will likely be required before construction can begin. Construction stormwater runoff may impact surface water bodies and best management practices should be applied to protect these water bodies before and after construction.	Douglas White, US Environmental Protection Agency	TVA will evaluate potential impacts to stormwater in the EIS. TVA and SR Tullahoma would comply with the terms of the Stormwater Pollution Prevention Plan prepared as part of the National Pollutant Discharge Elimination System permitting process to control soil erosion and runoff, such as the installation of erosion control silt fences and sediment traps. TVA and SR Tullahoma would also implement other routine best management practices as necessary, such as selective herbicide treatment to restrict application near receiving water features and proper vehicle maintenance to reduce the potential for adverse impacts to surface water and groundwater.
10	NOI	Mitigation Measures; Biological Resources	<p>Portions of the study area have exceptional potential for protection and management as a regionally important natural area, especially in support of the restoration of oak savanna grasslands and associated wetlands. The limited ecological and biological work that has been done in the study area has identified several wet grassland species on the Tennessee Rare Plant List, including short-leaved panic grass (<i>Dichanthelium ensifolium</i> subsp. <i>curtifolium</i>), button sedge (<i>Carex bullata</i>), dwarf sundew (<i>Drosera brevifolia</i>), yellow crested orchid (<i>Platanthera cristata</i>), and Tennessee featherbells (<i>Stenanthium tennesseense</i>), the latter being globally imperiled. Powerline and roadside rights-of-way in the study area contain remnants of the grassland flora, including rare species, endemic to the region prior to fire suppression. These corridors, along with their nearby woodlands, are high priority sites for conservation. The ponds in the study area may harbor rare species and natural communities and would benefit from restoration.</p> <p>While solar production is likely suitable for some sections of the property, for those areas that are the most ecologically sensitive, we see the potential for coupling preservation of rare species, ecological restoration, and public education and outreach.</p>	Dwyane Estes (Southeastern Grasslands Initiative)	TVA will evaluate potential impacts to biological resources in the EIS. TVA's analyses will include whether or not rare species and natural communities are known or potentially present in the study area or immediate vicinity via species habitat and/or presence/absence surveys, as also discussed in Comment No. 15. If needed, TVA and SR Tullahoma will consider conservation and environmental enhancement efforts, in coordination with state and federal agencies, as potential mitigation measures.
11	NOI	Socioeconomics	Statement that solar energy creates more jobs per Terawatt-hour (TWh), at 2,200/TWh, than the oil industry, at 1,000/TWh. The commenter further implies that this makes solar energy an economically viable source of renewable energy.	Lakshya Bharadwaj	TVA will evaluate potential impacts to employment in the EIS. TVA will consider how reduced energy costs from solar may be relevant to the socioeconomic analysis presented in the EIS.

Comment No.	Document	Topic	Public / Agency Comment	Commenter(s)	TVA Response
12	NOI	Socioeconomics	Statement that the decision to purchase solar energy can promote community awareness and community solar farms, the latter of which are known to reduce electricity bills by 10 to 15 percent.	Lakshya Bharadwaj	Comment noted.
13	NOI	Environmental Justice	Ensure protected populations are not disproportionately or adversely impacted by the project. The US Environmental Protection Agency (EPA) also promotes compliance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable. Please use the EJSscreen tool (https://www.epa.gov/ejscreen) as part of the NEPA analysis process.	Douglas White, US Environmental Protection Agency	TVA will evaluate potential impacts to minority and low-income populations, also known as environmental justice populations or "protected populations," in the EIS in accordance with EO 12898 and associated CEQ and USEPA guidance using US Census Bureau data and other state and local socioeconomic data, as appropriate. TVA will also comply with EO 13166, <u>Improving Access to Services for Persons with Limited English Proficiency</u> , if applicable in the project area, in public notifications for the Project.
14	NOI	Surface Water	Soil maps indicate the presence of hydric soils at the site suggest that coordination with Tennessee Department of Environment and Conservation (TDEC) and possibly the US Army Corps of Engineers (USACE) will be required for stream and wetland protection.	Dillon Blankenship, Tennessee Department of Environment and Conservation, Tennessee Natural Heritage Program	TVA is coordinating with TDEC and USACE on the surface water resources identified on the project site and will evaluate potential impacts to these in the EIS. TVA and SR Tullahoma would establish and maintain minimization buffers around water resources, per TVA's standard BMPs for protection of water resources. Impacts to resources deemed jurisdictional to TDEC and USACE would be permitted in compliance with the Clean Water Act Sections 401 and 404.

Comment No.	Document	Topic	Public / Agency Comment	Commenter(s)	TVA Response
15	NOI	Agency Coordination; Biological Resources	<p>Recommendations that a thorough field inventory of rare species be conducted for the study area in order to develop avoidance and minimization measures. Southeastern Grasslands Initiative recommended such a survey be conducted by trained botanists and ecologists knowledgeable about the many rare species and natural communities known from The Barrens of the Eastern Highland Rim. The Tennessee Natural Heritage Program reviewed the state's database with regard to the project boundaries and found six rare plant species and three rare wildlife species that have been observed previously within the project area or within one mile of the project area and eleven rare plant species and three rare wildlife species have been reported within four miles of the project area. Both entities offered to participate in the field inventory. Following the survey and the potential identification of rare species or associated habitat, the commenters offered to provide more specific recommendations such as the portions of the property that could be designated as natural areas. Both commenters recommended that the project coordinate with the Tennessee Wildlife Resources Agency (TWRA), Region 2, to ensure that rare species and natural communities are known for the project area or legal requirements for protection of state listed rare animals are addressed.</p>	<p>Dillon Blankenship, Tennessee Department of Environment and Conservation, Tennessee Natural Heritage Program, and Dwyane Estes, Southeastern Grasslands Initiative</p>	<p>TVA compiled lists of rare plants and animals from the Tennessee Department of Environment and Conservation (TDEC), as well as from the US Fish and Wildlife Service and TVA's Regional Natural Heritage Database, for the project area. TVA acknowledges the offer of assistance in the surveys and assures TDEC and the Southeastern Grasslands Initiative that the surveys are being conducted with the knowledge of potential protected species, per the compiled rare species lists. TVA is investigating the project site for suitability or presence of these species, and the field results and an analysis of impacts to the species and habitat will be provided in the EIS. TVA will provide notice to TDEC, TWRA, and other commenters and potentially interested state and federal agencies when the Draft EIS is issued for public review and comment.</p>

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From: [Wufoo](#)
To: [nepa](#)
Subject: NEPA Comments - Moore County Solar [#1]
Date: Friday, May 07, 2021 8:21:54 AM

This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the "Report Phishing" button located on the Outlook Toolbar at the top of your screen.

Name	Lakshya Bharadwaj
City	Orono
State	Maine
Email	[REDACTED]
Phone Number	[REDACTED]

Please provide your comments by uploading a file or by entering them below. *

Hello,

I understand that the point of this section is to discuss suggestions and concerns regarding the scope and components of the environmental impact study, and I will try to concisely do the same. This particular purchase of solar energy is a direct action indicating demand and support for the expansion of solar energy in the USA. Consequently, this procurement of energy will have an influence on energy policy in some manner, major or minor. For this reason, I appreciate the idea of a thorough environmental assessment.

These components may already be part of the study, but if they are not, I would like to point out how crucial it can be to account for the role solar energy plays in generating renewable energy jobs. At about 2200 jobs per TWh, solar energy creates many more jobs per unit of electricity generation than, for example, the oil industry does at about 1000 jobs per TWh. Moving forward, we need economically viable sources of renewable energy, and this statistic helps the cause greatly.

When it comes to emissions, solar energy is responsible for an emissions amount that is 95% less than that associated with the use of fossil fuels. Another environmental factor to keep in mind is the zero water requirement solar energy (Photo Voltaic) production has. The decision to purchase solar energy can also pave the way for community awareness and the involvement of community solar farms that are known to reduce electricity bills by 10% - 15%.

Thank you for your time, and best wishes for this project!

Sincerely,
Lakshya Bharadwaj

From: Kopec, Brett A <bkopec@usgs.gov>
Sent: Tuesday, May 11, 2021 8:35 AM
To: nepa
Cc: Janowicz, Jon A
Subject: Fw: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0166 - NOI TVA to Prepare an EIS for the purchase of electricity generated by the proposed Moore County Solar Project, Moore County, Tennessee

This is an **EXTERNAL EMAIL** from outside TVA. **THINK BEFORE** you **CLICK** links or **OPEN** attachments. If suspicious, please click the **"Report Phishing"** button located on the Outlook Toolbar at the top of your screen.

Brett Kopec
USGS
Administrative Operations Assistant

From: Gordon, Alison D <agordon@usgs.gov>
Sent: Monday, May 10, 2021 1:53 PM
To: Kopec, Brett A <bkopec@usgs.gov>
Cc: Janowicz, Jon A <jjanowicz@usgs.gov>
Subject: Fw: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0166 - NOI TVA to Prepare an EIS for the purchase of electricity generated by the proposed Moore County Solar Project, Moore County, Tennessee
The USGS has no comment at this time. Thank you.

From: oepchq@ios.doi.gov <oepchq@ios.doi.gov>
Sent: Monday, May 3, 2021 7:39 AM
To: Reddick, Virginia <Virginia_Reddick@ios.doi.gov>; Treichel, Lisa C <Lisa_Treichel@ios.doi.gov>; Alam, Shawn K <Shawn_Alam@ios.doi.gov>; Braegelmann, Carol <carol_braegelmann@ios.doi.gov>; Kelly, Cheryl L <cheryl_kelly@ios.doi.gov>; ERs, FWS HQ <FWS_HQ_ERs@fws.gov>; Runkel, Roxanne <Roxanne_Runkel@nps.gov>; Stedeford, Melissa <Melissa_Stedeford@nps.gov>; Hamlett, Stephanie R <shamlett@osmre.gov>; Janowicz, Jon A <jjanowicz@usgs.gov>; Gordon, Alison D <agordon@usgs.gov>; oepchq@ios.doi.gov <oepchq@ios.doi.gov>; Stanley, Joyce A <Joyce_Stanley@ios.doi.gov>
Subject: ENVIRONMENTAL REVIEW (ER) NEW POSTING NOTIFICATION: ER21/0166 - NOI TVA to Prepare an EIS for the purchase of electricity generated by the proposed Moore County Solar Project, Moore County, Tennessee
This e-mail alerts you to a Environmental Review (ER) request from the Office of Environmental Policy and Compliance (OEPC). This ER can be accessed [here](#).
To access electronic ERs visit the Environmental Assignments website: <https://ecl.doi.gov/ERs.cfm>. For assistance, please contact the Environmental Review Team at 202-208-5464.
Comments due to Agency by: 06/04/21

From: [REDACTED]
Sent: Tuesday, May 11, 2021 9:40 AM
To: nepa
Subject: Comment from Moore County, Tennessee concerning solar power.

This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the "Report Phishing" button located on the Outlook Toolbar at the top of your screen.

My comment is solar energy is a possible. Plus in certain areas in our daily .Life, but it could be devastating in other areas of our daily life. I keep remembrng those people in Texas that almost froze to death this past winter.

I believe God has taken care of us all these years but we do need to watch what we allow to enter our atmosphere .

Think I we would be better to repair an reinforce the infrastructures we have. Now

Thank you
Brenda

Sent via the Samsung Galaxy Tab E, an AT&T 4G LTE tablet

From: [White, Douglas](#)
To: [nepa](#)
Cc: [Kajumba, Ntale](#); [Somerville, Amanetta](#)
Subject: TVA NOI Moore County Solar NEPA EPA Comments
Date: Friday, May 28, 2021 12:47:43 PM

This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the "Report Phishing" button located on the Outlook Toolbar at the top of your screen.

Good afternoon Ms. Pilakowski,

Re: Notice of Intent for the Tennessee Valley Authority Preparation of an Environmental Impact Statement or Environmental Assessment for the Purchase of Electricity Generated by the Proposed Moore County Solar Project in Moore County, Tennessee.

The U. S. Environmental Protection Agency (EPA) is in receipt of the referenced document and has reviewed the subject proposal in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The EPA understands that the Tennessee Valley Authority (TVA) is conducting a NEPA analysis for the proposed construction, operation, and maintenance of a 200-megawatt solar facility in Moore County, Tennessee. The proposed project will occupy 2,000 acres of a predominantly forested 3,300-acre study area bordering Tullahoma. The proposed actions will increase solar power generation as recommended by TVA's 2019 Integrated Resource Plan (IRP) and in response to customer demand for renewable energy.

The EPA recognizes that the proposed solar project has the potential to provide a net benefit to human health and the environment. Based on our review of the scoping document, the EPA has the following comments:

Alternatives: The EPA appreciates the TVA efforts towards developing and analyzing an appropriate amount of alternative project proposals. The EPA recommends including details of considered alternatives within the NEPA documents. Please consider using the NEPAassist tool (<https://www.epa.gov/nepa/nepassist>), in addition to localized data sources and tools, when conducting the NEPA analysis. NEPAassist combines multiple Geographic Information System (GIS) and internet databases to help screen for environmental concerns.

Wetlands and Streams: This proposed action is situated in a predominantly forested area home to interspersed creeks and wetlands. The EPA recommends that design proposals and construction avoid impacting these Waters of the United States (WOTUS) to the maximum extent practicable by locating permanent proposed infrastructure and temporary construction measures away from WOTUS and respective buffers. WOTUS should be delineated and coordination with the US Army Corps of Engineers (USACE) should be made where proposed activities might enter or affect WOTUS. Flood water mapping should occur to ensure proposed activities do not take place in floodplains except where alternatives are not practicable.

Stormwater - The proposed action has the potential to disturb a considerable amount of soil and a state or county construction stormwater permit will likely be required before construction can begin. Construction stormwater runoff may impact surface water bodies and best management practices should be applied to protect these water bodies before and after construction.

Air Quality and Climate Change: Solar energy has the potential to preserve regional air quality when used to meet growing energy needs and contributes to improved air quality when replacing existing fossil fuel energy sources. The EPA recommends that net greenhouse gas emissions related to this proposal and TVA's 2019 IRP be considered in the NEPA analysis;

While efforts to limit climate change may not lessen the significance of directly or indirectly unrelated impacts, their growing necessity has the potential to provide the substance of decision-making where comparisons of proposals and resulting impacts must be made. Additionally, this project site is within an attainment area for air quality standards, however localized impacts to air quality could occur during construction due to equipment exhaust emissions and fugitive dust. The EPA recommends implementing measures to reduce diesel emissions, such as switching to cleaner fuels, retrofitting current equipment with emission reduction technologies, repowering older engines with newer cleaner engines, replacing older vehicles, and reducing idling through operator training and/or contracting policies. We also encourage controlling fugitive dust by watering or the application of other controlled materials.

Environmental Justice: Consistent with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

(<https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice>), please ensure protected populations are not disproportionately or adversely impacted by the project. We also promote compliance with Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, if applicable. Please use the EJSCREEN tool (<https://www.epa.gov/ejscreen>) as part of the NEPA analysis process. EJSCREEN combines environmental and demographic data to help determine environmental justice concerns that are integral to the NEPA process.

Energy and Land Use: The EPA commends the TVA for pursuing solar energy sources to meet the electricity needs of the Tennessee Valley region. This proposed action provides the TVA an opportunity to study land use efficiency of solar energy development in the Tennessee Valley region. Local climate, ecosystems, and agriculture affect the net benefit of photovoltaic solar infrastructure regarding carbon release and sequestration. The EPA recommends consideration of dual land use where land use efficiency can be increased

(<https://www.energy.gov/eere/solar/farmers-guide-going-solar>).

Thank you for the opportunity to provide comments on the TVA's proposed project in Moore County Tennessee. If you have any questions, feel free to contact me via the information provided below.

V/R Douglas White

U.S. Environmental Protection Agency / Region 4

Strategic Programs Office, NEPA Section

61 Forsyth Street, SW

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STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Natural Areas
Natural Heritage Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 2nd Floor
Nashville, Tennessee 37243
Phone 615/532-0431 Fax 615/532-0046

June 3, 2021

Ashley Pilakowski
TVA
400 West Summit Hill Drive, WT 11B
Knoxville, TN 37902

Subject: Moore County Solar Project
(35.35659, -86.27623)
Moore County, TN
Rare Species Database Review

Dear Ms. Pilakowski:

Thank you for allowing us to comment on the Moore County Solar Project proposed by TVA.

Per your description in the Notice of Intent:

TVA has entered into a PPA with Silicon Ranch Corporation to purchase 200 MW AC of power generated by the proposed Moore County Solar Project, hereafter referred to as the project. The proposed 200 MW AC solar facility would occupy approximately 2,000 acres of the roughly 3,300-acre Project Study Area which is located entirely in Moore County, Tennessee. The project site is bisected by State Route 55 and its eastern boundary borders the western city limits of Tullahoma, Tennessee. The project site is mostly forested with areas of wetlands, croplands, and early successional fields. A TVA 161-kilovolt transmission line runs north-south through the site

We have reviewed the state's natural heritage database with regard to the project boundaries, and we find that the following rare species have been observed previously within the project area or within one mile of the project area:

Table with 8 columns: Type, Scientific Name, Common Name, Global Rank, St. Rank, Fed. Prot., St. Prot., Habitat. It lists two species: Dichantherium acuminatum ssp. leucothrix and Dichantherium ensifolium ssp. curtifolium.

Type	Scientific Name	Common Name	Global Rank	St. Rank	Fed. Prot.	St. Prot.	Habitat
Vascular Plant	<i>Drosera brevifolia</i>	Dwarf Sundew	G5	S2	--	T	Wet Barrens and Ecotones
Vascular Plant	<i>Platanthera cristata</i>	Yellow Crested Orchid	G5	S2S3	--	S	Acidic Seeps and Stream Heads
Vascular Plant	<i>Stenanthium tennesseense</i>	Death-camas	G2	S2	--	T	Acidic Wetlands
International Vegetation Classification - Natural	<i>Quercus phellos</i> - <i>Quercus alba</i> / <i>Vaccinium fuscatum</i> - (<i>Viburnum nudum</i>) / <i>Carex barrattii</i> Wet Forest	Barrens Depression Willow Oak Forest	G2	SNR	--	Rare, Not State Listed	
Vertebrate Animal	<i>Fundulus julisia</i>	Barrens Topminnow	G1	S1	LE	E	Springs, spring runs, and first- and second-order headwaters and creeks in the Barrens of Cannon, Coffee, & Warren counties.
Vertebrate Animal	<i>Hemitremia flammea</i>	Flame Chub	G3	S3	--	D	Springs and spring-fed streams with lush aquatic vegetation; Tennessee & middle Cumberland river watersheds.
Vertebrate Animal	<i>Myotis grisescens</i>	Gray Myotis	G4	S2	LE	E	Cave obligate year-round; frequents forested areas; migratory.

Within four miles of the project area the following additional rare species have been reported:

Type	Scientific Name	Common Name	Global Rank	St. Rank	Fed. Prot.	St. Prot.	Habitat
Vascular Plant	<i>Eleocharis wolfii</i>	Wolf Spike-rush	G3G5	S1	--	E	Wet Woods on Floodplains

Type	Scientific Name	Common Name	Global Rank	St. Rank	Fed. Prot.	St. Prot.	Habitat
Vascular Plant	<i>Gaylussacia dumosa</i>	Dwarf Huckleberry	G5	S3	--	T	Barrens
Vascular Plant	<i>Gymnopogon brevifolius</i>	Broad-leaved Beardgrass	G5	S1S2	--	S	Barrens
Vascular Plant	<i>Helianthemum propinquum</i>	Low Frostweed	G4	S1S2	--	E	Barrens
Vascular Plant	<i>Helianthus eggertii</i>	Eggert's Sunflower	G3	S3	DM	S	Barrens and Roadsides
Vascular Plant	<i>Iris prismatica</i>	Slender Blue Flag	G4G5	S2S3	--	T	Wet Barrens
Vascular Plant	<i>Lespedeza angustifolia</i>	Narrowleaf Bushclover	G5	S2	--	T	Barrens
Vascular Plant	<i>Prenanthes aspera</i>	Rough Rattlesnake-root	G4?	S1	--	E	Barrens and Roadsides
Vascular Plant	<i>Prunus pumila</i>	Sand Cherry	G5	S1	--	E	Barrens
Vascular Plant	<i>Rhynchospora perplexa</i>	Obscure Beak-rush	G5	S2	--	T	Marshes, Wet Barrens
Vascular Plant	<i>Silene ovata</i>	Ovate Catchfly	G3	S2	--	E	Open Oak Woods
Invertebrate Animal	<i>Hesperochernes mirabilis</i>	Southeastern Cave Pseudoscorpion	G5	S3	--	Rare, Not State Listed	Terrestrial cave obligate; woodrat debris in caves; middle Tennessee.
Vertebrate Animal	<i>Etheostoma luteovinctum</i>	Redband Darter	G4	S4	--	D	Limestone streams; Nashville Basin & portions of Highland Rim.
Vertebrate Animal	<i>Pituophis melanoleucus melanoleucus</i>	Northern Pinesnake	G4T4	S3	--	T	Well-drained sandy soils in pine/pine-oak woods; dry mountain ridges; E portions of west TN, E to lower elev of the Appalachians.

The Division of Natural Areas - Natural Heritage Program has reviewed the location of the proposed project workspace with respect to rare plant species. Based on the habitat within the project area and the type of project, we anticipate potential impacts to occurrences of rare, threatened, or endangered plant species from this project.

This portion of Moore County is more similar to Coffee County and its suite of natural communities and species than to the rest of Moore County. The site could contain as many rare species as ecologically rich areas of the Eastern Highland Rim Barrens nearby in Coffee County. Extensive rare species surveys would be needed to ensure minimal impact; the known rare plants will likely be wet woodland or open wetland and barrens species. Following surveys, it may be possible for locations with rare species or significant natural communities to be avoided in development plans and possibly enhanced with suitable habitat management. As such, some portions of the property could be appropriate for non-binding natural area registry agreements or even designation, if appropriate.

Moreover, soil maps indicating the presence of hydric soils at the site suggest that coordination with TDEC and possibly USACE will be required for stream and wetland protection. The Division requests further correspondence from the requesting party as rare species surveys are undertaken and project plans are developed for the site. The Division may be available to provide technical assistance in conducting surveys for rare species and natural communities within the Eastern Highland Rim Barrens region. The Division of Natural Areas considers this property of high conservation value due to the multiple listed rare species and rare wetlands on the site. The Division will support long term conservation efforts for this valuable resource.

We ask that you also coordinate this project with the Tennessee Wildlife Resources Agency (Region 2, Mike Murdock, 615-781-6581, mike.murdock@tn.gov) to ensure that legal requirements for protection of state listed rare animals are addressed. Additionally, we ask that you contact the U.S. Fish and Wildlife Service Field Office, Cookeville, Tennessee (931-525-4970) for comments regarding federally listed species

Thank you for considering Tennessee's rare species throughout the planning of this project. Should you have any questions, please do not hesitate to contact me at 615-532-4799 or dillon.blankenship@tn.gov.

Sincerely,

Dillon

Dillon Blankenship | Environmental Review Coordinator
Tennessee Natural Heritage Program



Ashley Pilakowski
Tennessee Valley Authority
400 West Summit Hill Drive, WT 11B
Knoxville, TN 37902

June 4, 2021

Re: Moore County, TN Solar Project site

Ms. Pilakowski:

We're writing to express our interest in and concern regarding a tract of land under consideration for conversion to a solar energy production facility (the Moore County Solar Project). In short, we believe portions of the tract have exceptional potential for protection and management as a regionally-important natural area, especially for the restoration of oak savanna grasslands and associated wetlands. We envision win-win opportunities for solar production, rare species conservation, ecological restoration, and public education and outreach.

This particular area is known to support high-quality examples of globally rare flatwoods and wet grassland (in the powerline rights-of-way) natural communities that support several species of state and global conservation concern. As far as we are aware, only limited ecological and biological inventory work has been done on the site but several wet grassland species on the *Tennessee Rare Plant List* have been documented including Short-leaved Panic Grass (*Dichanthelium ensifolium* subsp. *curtifolium*), Button Sedge (*Carex bullata*), Dwarf Sundew (*Drosera brevifolia*), Yellow Crested Orchid (*Platanthera cristata*), and Tennessee Featherbells (*Stenanthium tennesseense*). This latter species was described new-to-science in 2017, by one of SGI's team members (Dr. Alan Weakley), and is extremely rare globally, with a conservation status rank of G2S2 (Globally Imperiled). This savanna endemic wildflower is known to survive in just a handful of populations in four counties in central Tennessee and nowhere else in the world. Protecting and properly managing populations of Tennessee Featherbells is among the highest conservation priorities in the state and region. In addition, it is highly likely that other savanna and open wetland species of state and global concern occur on the property and will be found with additional inventory. We recommend that you check with the Tennessee Natural Heritage Program and Tennessee Wildlife Resources Agency to determine if other rare species and natural communities are known from the site or immediate area.

Prior to Euro-American settlement and the disruption of naturally occurring landscape-scale fires (which burned historically every 1-5 years based on recent tree-ring research), this area of the Eastern Highland Rim of Tennessee, known as "The Barrens," was a mosaic of grasslands (oak savannas, prairies, marshes), open grassy flatwoods, and forested wetlands. During the past century-and-a-half these savanna grasslands and other open communities have become unnaturally densely forested (as they are today) due to prolonged fire suppression. The more open of these communities – the grasslands and grassland-related woodlands – supported extraordinarily high concentrations of plant and animal species, many of which have declined dramatically and are today listed as species of conservation concern (rare species) by the State of Tennessee. Remaining intact examples (including open road and utility rights-of-way through otherwise "closed in" savannas and woodlands) are known to support many of these species of concern. Nearby examples include May Prairie State Natural Area, Powerline Barrens State Natural Area, and a number of other sites on Arnold Air Force Base. Many sites that have been degraded by becoming "closed in" may still contain enough



remnant grassland species to be considered restorable. Additionally, powerline and roadside rights-of-way on the tract contain remnants of the grassland flora, including these rare species. These corridors along with their nearby woodlands are also high priority sites for conservation.

These fire-suppressed flatwoods are seasonally wet and often contain embedded permanent wetlands. Analysis of aerial imagery shows the presence of numerous sinkhole depression ponds or other wetlands on the tract. Recent research by a graduate student at Austin Peay State University, who studied dozens of these ponds across the southern Eastern Highland Rim, found that ponds in this region are globally unique wetlands that support numerous rare plant species, including several that occur nowhere else in Tennessee or outside of the “Barrens” area. These ponds, like the nearby flatwoods, have become excessively dense with woody vegetation over the past century. The student found that these ponds have a high number of light-dependent rare wet grassland species and, like the adjacent flatwoods, they are in need of restoration to create more of an open savanna grassland mosaic. It is likely that the ponds on this tract in Moore County harbor some of these rare species and natural communities and would benefit from restoration.

The Southeastern Grasslands Initiative (SGI) works to conserve, restore, and promote native grasslands of all types throughout the southeastern United States. We work with a wide variety of partners (including the Tennessee Valley Authority) to identify, protect, restore, and manage sensitive ecological sites such as this one. We are presently working on a project with the TVA studying remnant grassland plant communities in transmission powerline rights-of-way in the adjacent Cumberland Plateau Ecoregion. We recommend a thorough inventory of the site by trained botanists and ecologists knowledgeable about the many rare species and natural communities known from The Barrens of the Eastern Highland Rim. This work is essential prior to development so that the most ecologically sensitive areas can be considered in the planning of the site. We would be happy to participate in such inventory and offer further, more specific recommendations regarding areas deserving protection, restoration, and management.

In summary, there are “win-win” opportunities for this project. While solar production is likely suitable for some sections of the property, for those areas that are the most ecologically sensitive, we see the potential for coupling preservation of rare species, ecological restoration, and public education and outreach. Restoration of the grassland components of The Barrens has been a high priority for our organization since its inception. For the past several months, we have been having conversations with leaders in education, business, and municipal government in Moore County about how to escalate grassland conservation efforts in The Barrens. We see opportunities here to accomplish something very special through collaboration.

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Dwayne Estes".

Dwayne Estes Ph.D., Executive Director

A handwritten signature in black ink that reads "Theo Witsell".

Theo Witsell, Chief Ecologist

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