



**SIERRA
CLUB**

Sierra Club
Tennessee Chapter
3712 Ringgold Road, #156,
Chattanooga, TN 37412-1638

March 22, 2017

Anita E. Masters
Tennessee Valley Authority
1101 Market Street, BR 4A
Chattanooga, Tennessee 37402

Dear Ms. Masters:

The Tennessee Chapter Sierra Club welcomes the opportunity to provide scoping comments on TVA's proposed Environmental Impact Statement (EIS) - Transmission System Vegetation Management Program (VMP). Our comments are submitted on behalf of the Tennessee Chapter's more than 44,000 members and supporters who live in TVA's service area.

As stated in your Notice of Intent, TVA's "broad mission is to foster the social and economic welfare of the people of the Tennessee Valley region and to promote the proper use and conservation of the region's natural resources." The region's natural resources include those within and bordering TVA's transmission line right-of-ways (ROW), encompassing some 280,000 acres of land along 17,000 miles of transmission line corridors. The EIS should thus broadly study how TVA's VMP affects not only the physical environment along these corridors, but the social and economic welfare of the people of the Tennessee Valley.

It should be noted that TVA's VMP was changed around 2011 or 2012, without public notice, from allowing low-growing trees in the ROW and retaining a buffer zone along the edges of the ROW with less stringent vegetation management practices, to a policy of clearcutting the entire ROW and spraying a herbicide cocktail to eliminate all woody growth. This was done for the stated reason that TVA needed to eliminate any threat to their transmission lines in accordance with FERC rules and to avoid the risk of incurring a million dollar fine. TVA gave as a motivating example an incident in Ohio in 2003 when a single tree fell against a transmission line and caused widespread power outages and blackouts. The VMP was changed despite the fact that in the entirety of TVA's existence, no incident of transmission line damage or failure had occurred under the original VMP.

Specifically, the EIS should:

- Accurately and fully describe the 17,000 miles of ROW, including the number of trees and the populations of wildlife found in the ROW, including the extent and character of the buffer zones, and the wire zone.
- Study the anticipated effects of not only the three identified alternatives, but more broadly a true no action alternative that includes no VMP; an alternative that includes managing only for woody vegetation of all types that can be kept more than 10 feet from transmission lines or transmission structures; and an alternative that includes managing for a graduated height of vegetation from the center line of the ROW to its edge.
- Study the anticipated effects of alternative methods of vegetation ranging from mowing to physical trimming and cutting to herbicide use.
- Study the social and economic costs of entering private property and conducting tree removal and other vegetation management methods on the ROW without prior notice and consultation with the landowner.
- The study must make clear the history of TVA's VMP, including full descriptions of the various practices employed over the years, and give the reasons why changes were implemented. The EIS must provide full, clear, and objective descriptions of the various VMP alternatives studied
- Study the amounts of greenhouse gases generated by the wholesale destruction of trees throughout the 17,000 miles of ROW, and the loss of CO₂ sequestration caused by the loss of these trees. In short, the study should provide an estimate of the climate change impacts of the various VMP alternatives.
- Study the need for, and the costs associated with, reclamation and remediation of the areas within the ROW that would be cleared under the border-to-border alternative.
- Study the short-term and long-term effects on the ecology of the ROW and adjacent areas of the herbicide mixtures used, as well as on the health and safety of the landowners, their families and livestock, and the personnel doing the spraying. It should be noted here that TVA does not, and has not provided to affected landowners or the public information on the composition of the herbicide mixtures used unless specifically asked for.
- Study the impacts of the physical damage to land and soils by the heavy equipment TVA uses to clearcut woody vegetation.
- Study the effects of the border-to-border VMP on nesting birds and other species, and whether this would violate the Migratory Bird Treaty Act, Endangered Species Act, or any similar state laws. The EIS should state whether TVA

consults with any federal or state wildlife related agencies prior to destroying breeding habitat.

- Study the loss of economic value to landowners of the destruction of trees resulting from the border-to-border alternative.

Thank you for considering these comments.

DocuSigned by:

Axel Ringe

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Axel C. Ringe

Conservation Chair

Tennessee Chapter Sierra Club

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