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Farm PPA
Project Number: 2014-15

**PURCHASE OF POWER GENERATED AT MARSHALL
PROPERTIES SOLAR FARM
Union County, Georgia
ENVIRONMENTAL ASSESSMENT**

Prepared by:
TENNESSEE VALLEY AUTHORITY
Knoxville, Tennessee

March 2014

To request further information, contact:
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CHAPTER 1 – PURPOSE AND NEED FOR ACTION

The Tennessee Valley Authority (TVA) proposes to enter into a power purchase agreement (PPA) with Marshall Properties, LLC, to purchase electric power generated at their proposed 684-kilowatt (kW) solar farm near Blairsville, Union County, Georgia (Figure 1). The PPA would be executed through TVA's Renewable Standard Offer (RSO) program.

TVA produces or obtains electricity from a diverse portfolio of energy sources such as nuclear, fossil, hydro, solar, wind, and biomass. In order to help fulfill the objectives of its 2011 Integrated Resource Plan (IRP; TVA 2011), 2007 Strategic Plan (TVA 2007), and 2008 Environmental Policy (TVA 2008), TVA has undertaken efforts to expand the contribution of renewable and low greenhouse gas-emitting sources in its generation portfolio. The RSO program is one of the mechanisms used by TVA to increase its use of renewable energy, including energy generated by solar photo-voltaic (PV) facilities such as that proposed by Marshall Properties.



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Figure 1. Location of proposed Marshall Properties solar farm near Blairsville, Georgia.

Marshall Properties Solar Farm

Under the proposed action, TVA would execute a PPA with Marshall Properties that would result in the construction and operation of the 684-kW (direct current (DC)) Blairsville solar farm. Under the terms of the PPA, TVA would purchase the electricity generated by the solar farm for a 20-year period. Marshall Properties would own the solar farm which would be constructed by Creative Solar USA, Inc. It would be located on a 6.6-acre site on T. Hughes Drive approximately 4 miles north north-west of Blairsville. The facility would consist of 2,288 PV panels fastened to ground-mounted racks. The facility would be connected to the distribution network of Blue Ridge Mountain Electric Membership Corporation (BRMEMC), which in turn would transmit the power to the TVA transmission network.

TVA has prepared this environmental assessment (EA) under the National Environmental Policy Act (NEPA) and TVA's NEPA procedures in order to assess the potential impacts of entering into the PPA and the associated impacts of the construction and operation of the proposed solar farm.

The proposed solar farm would require an NPDES General Permit for the discharge of stormwater associated with construction activity. Marshall Properties has submitted the notice of intent for coverage under this permit to the Georgia Department of Natural Resources Environmental Protection Division. Marshall Properties has also received the necessary Land-Disturbing Activity permit from Union County.

CHAPTER 2 - ALTERNATIVES

Description of Alternatives

This EA evaluates two alternatives: the No Action Alternative and the Action Alternative. These are described in more detail below.

Alternative A – The No Action Alternative

Under the No Action Alternative, TVA would not purchase power from the solar farm and the solar farm would not be constructed and operated by Marshall Properties. TVA would continue to rely on other sources of electrical power to meet the needs of its customers.

Alternative B – Construction and Operation of Proposed Solar Farm

Under the Action Alternative, TVA would enter into a PPA through the RSO program to purchase the electricity generated from the proposed solar farm. Marshall Properties would consequently construct and operate the solar farm.

The solar farm would occupy a 6.6-acre site on T. Hughes Drive approximately 4 miles north north-west of Blairsville. The project site is located about 900 feet west of T. Hughes Drive and would be connected to T. Hughes Drive by a light-duty gravel access road constructed within a 30-foot wide corridor. Three trees at the intersection of the T. Hughes Drive and the access road would be removed to allow for ingress/egress. Trees within the area of the proposed PV panels and nearby trees which could shade the panels would also be removed. A stormwater detention pond would be constructed in the southwest quadrant of the site. An area of approximately 200 feet by 500 feet where the PV panels and associated equipment would be installed would be graded to a smoother slope while maintaining the overall existing south- and west-facing aspect. The cut and fill would be balanced and no graded material would be transported offsite. A light-duty gravel perimeter drive would be constructed around the leveled pad.

A total of 2,288 PV panels, each approximately 41 inches by 72 inches, would be installed on ground-mounted racks arranged in parallel east-west rows. The solar panels would be supported by structural steel sections driven into the ground to a depth of about six feet and fastened to prefabricated mounting kits. They would be fixed-tilt and oriented to the south. They would be connected with electrical wires to inverters which would convert their output from DC to alternating current (AC). The inverters would be connected by electrical wires buried in trenches to an onsite transformer mounted on a concrete pad. The transformer would be connected to a new above-ground electrical distribution line. This line would be run from the solar farm site to T. Hughes Drive, and then along T. Hughes Drive approximately 650 feet northward to the intersection with Gumlog Road, where it would connect with an existing BRMEMC line. It would be constructed within the solar farm access corridor and within the right-of-way of T. Hughes Drive. No upgrades to the BRMEMC system are anticipated.

Once construction is completed, the site would be revegetated with low-growing grasses. A small pre-fabricated equipment shed would be placed on the site and the site would be enclosed by a chain-link fence. Leland cypress trees would be planted just outside the fence to provide a visual buffer. No night lighting is anticipated, and no water supply or sewer disposal facilities or services would be required.

Marshall Properties Solar Farm

No major physical disturbance would occur during operation of the PV facility. Vegetation within the fenced area would be maintained by periodic mowing and/or grazing by sheep.

Construction would require 4-5 months with total employment of about 30 people working for variable durations. Once the facility is completed, there would be no on-site operators and periodic maintenance would be carried out by workers based outside the project area.

Identification of Mitigation Measures

TVA has not identified the need for any non-routine mitigation measures to further reduce the anticipated impacts of the proposed action.

The Preferred Alternative

TVA's preferred alternative is Alternative B – Construction and Operation of Proposed Solar Farm. Under this alternative, TVA would enter into the PPA with Marshall Properties who would then construct and operate the proposed solar farm.

CHAPTER 3 – AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the environmental resources that could be affected by the two alternatives and the effects of the alternatives on those resources. Through scoping of the proposed action, TVA has determined that some environmental resources would not be affected. No wetlands occur on the proposed solar farm site and the site is not located within a designated floodplain. These resources would not be affected and the proposed action is consistent with Executive Order (EO) 11990 Protection of Wetlands and EO 11988, Floodplain Management. No hazardous wastes would be generated. Other environmental resources that could be affected are described below.

Air Quality and Greenhouse Gas Emissions

Affected Environment – Union County, Georgia is in attainment with the National Ambient Air Quality Standards established under the Clean Air Act for criteria pollutants. The system-wide emissions from TVA's electrical generating facilities through 2008/2009 are described in the 2011 IRP EIS (TVA 2011). Since then, TVA has reduced its emissions of criteria pollutants and greenhouse gases through the installation of emission controls at fossil-fueled plants, idling and retirement of coal-fired generating units, increased use of low-emission generating facilities, and increased energy efficiency and demand reduction efforts.

Environmental Consequences – Under the No Action Alternative, the proposed solar farm would not be constructed and no project-related impacts on air quality or climate change would occur. TVA would continue to rely on other generation sources to meet the needs of its customers and its goal of reducing its greenhouse gas (GHG) emissions.

Under the Action Alternative, minor impacts to air quality would occur. Site grading and other construction activities have the potential to generate fugitive dust (particulate matter, PM). This would be minimized by the use of best management practices and offsite impacts of the fugitive dust would be negligible. The fossil-fueled construction equipment would emit PM, nitrogen oxides, and other pollutants; the total amount of these emissions would be small and would result in negligible impacts. The construction equipment would also emit GHGs (particularly carbon dioxide, CO₂); the impacts of these would also be negligible. The operation of the solar farm would result in a very small reduction in TVA's GHG emission rate because the emissions (including CO₂)-free power generated by the solar farm would displace power that would otherwise be generated in part by fossil fuels. This would result in a minor beneficial impact to air quality.

Water Resources

Affected Environment - No streams or other water bodies occur on or adjacent to the proposed solar farm site. Reece Creek is located about 0.2 miles south of the site and Ivylog Creek is located about 0.8 miles northeast of the site. Both these creeks drain to Nottely Reservoir, which is located about 1.5 miles to the west. The primary site drainage is to the southwest to Reece Creek. Reece Creek meets applicable water quality standards.

Environmental Consequences – Under the No Action Alternative, the proposed solar farm would not be constructed and no project-related impacts to water resources would occur.

Under the Action Alternative, impacts to water resources could occur from the runoff of sediment-laden stormwater, particularly during construction. Creative Solar would minimize these potential impacts by implementing an Erosion, Sedimentation and Pollution Control Plan. Measures to be implemented include the installation of sediment barriers, the construction of a temporary sediment basin, and routing of runoff from disturbed areas to the sediment basin. Graded areas would be promptly revegetated. With implementation of these measures, impacts to surface waters would be insignificant during construction and no long-term impacts to surface waters are anticipated. The maximum depth of excavation and other construction activities would be about 6 feet and no impacts to groundwater are anticipated.

Vegetation and Wildlife

Existing Environment – The project site is located in the Southern Blue Ridge ecoregion, a heavily forested and mountainous area. The site is at a relatively low elevation of about 1960 feet above sea level. Dominant forest types in the vicinity of the site are oak-hickory and oak-pine. Most of the site is an old field recently used as pasture. Dominant vegetation includes broomsedge, ragweed, goldenrod, and fescue, with scattered thickets of blackberries, privet, and honeysuckle. A few patches of trees occur on the western half of the site, which adjoins a larger forested area. Tree species on and adjacent to the site include red maple, yellow poplar, black oak, and black cherry.

Wildlife species on the site are those occupying low-elevation old fields and open woodland such as white-tailed deer, eastern cottontail, wild turkey, common yellowthroat, northern cardinal, indigo bunting, and field and song sparrows. The habitats on the project site are relatively common in the local area and no unusual or rare plant or wildlife communities are present.

Environmental Consequences – Under the No Action Alternative, the proposed solar farm would not be constructed and no project-related impacts to vegetation and wildlife would occur.

Under the Action Alternative, vegetation would be removed from most of the 6.6 acre site. Multiple rows of PV panels on metal racks would be installed, enclosed by a chain-link security fence. This would displace most of the wildlife on the site. Although the impacts on plant and animal species on the site would be adverse, these species are common in the region and overall impacts would be insignificant. Following the completion of construction, the site would be revegetated with grasses and Leland cypress trees would be planted around much of the site perimeter. Vegetation within the fenced area would be maintained by either mowing or grazing by sheep. Operation of the solar farm would not result in any additional adverse impacts to vegetation or wildlife.

Endangered and Threatened Species

Existing Environment – Two state-listed plants and one state-listed animal have been reported from within 3-5 miles of the project area (Table 1). An additional plant and two animals that are listed or proposed for listing under the Endangered Species Act (ESA) are known from or likely to occur in Union County, Georgia (Table 1). No aquatic species listed

under the ESA are known to occur in Union County, and no federally or state-listed aquatic species are known or likely to occur in the streams draining the project area. Habitat for the listed plants species does not occur on the site or in the immediate vicinity of the proposed solar facility site.

Table 1. Endangered, threatened, and other species of conservation concern listed for Union County, Georgia

Common Name	Scientific Name	Federal status	GA State status/rank
<u>Plants</u>			
Fringed gentian	<i>Gentiaopsis crinata</i>	--	THR/S1
Pink Lady's slipper	<i>Cypripedium acaule</i>	--	UNUS/S4
Small whorled pogonia	<i>Isotria medioloides</i>	THR	END/S2
<u>Animals</u>			
Least weasel	<i>Mustela nivalis</i>	--	TRKD/S1
Northern long-eared bat	<i>Myotis septentrionalis</i>	Prop END	-- (S3/S4)
Indiana bat	<i>Myotis sodalis</i>	END	END/S1

Source: TVA Heritage database, accessed December 2013, and U.S. Fish and Wildlife Service IPaC data, accessed December 2013.

Status abbreviations: END – Endangered; Prop END – Proposed for listing as Endangered; THR – Threatened; TRKD – Tracked; UNUS – Unusual

Rank abbreviations: S1 – Critically imperiled; S2 – Imperiled; S3 – Vulnerable; S4 – Apparently secure

The least weasel occupies open forests, farmland and cultivated areas, grassy fields and meadows, and hedgerows. Potentially suitable habitat for the least weasel occurs in the project area. Indiana bats and northern long-eared bats both inhabit caves during the winter and migrate to roost in trees during spring and summer. Spring and summer roosting by Indiana bats occurs under exfoliating bark, cracks, crevices, and hollows of both dead and live trees. Although they change roost trees frequently, Indiana bats maintain fidelity to particular areas both during a summer and from year to year (USFWS 2007). Northern long-eared bats appear to be somewhat more opportunistic in their selection of roost trees (Lereculeur 2012). No caves are known from within 3 miles of the project area. Prior to being recently cleared, scattered patches of trees with a total area of about 2 acres occurred on part of the proposed solar farm site. Based on the species composition of trees in the immediate surrounding area, it is unlikely that suitable summer roost habitat for the two species of bats occurred on the project area, and no suitable bat roost habitat currently occurs on the site.

Environmental Consequences – Under the No Action Alternative, the proposed solar farm would not be constructed and no project-related impacts to federally or state-listed endangered or threatened species or other species of conservation concern would occur.

Under the Action Alternative, no federally or state-listed plants or aquatic species would be affected. Prior to its recent clearing, the proposed solar farm site may have provided habitat for the least weasel. Any impacts to this species from the construction of the solar farm would be minor and unlikely to adversely affect its regional population. Suitable summer roost habitat for the Indiana and northern long-eared bats does not occur on the

Marshall Properties Solar Farm

project site. Potential habitat for these bats does occur in the surrounding area and would not be affected by construction and operation of the proposed solar farm. No impacts to species listed or proposed for listing under the Endangered Species Act are anticipated. Any impacts to state-listed species would be minor and insignificant.

Land Use

Existing Environment – The proposed solar farm site is in a rural area, approximately 4 miles north-northwest of Blairsville, the nearest incorporated town. Recent land use of the proposed site is agricultural, primarily as pasture. Adjacent and nearby land uses are forest, agricultural (primarily pasture), and low density residential. The area between the proposed site and T. Hughes Road is pasture, and houses have recently been constructed along the opposite side of T. Hughes Road.

Union County does not have county-wide zoning. It does have ordinances governing construction that could affect water supply watersheds, river corridors, mountains, and wetlands (Union County Code of Ordinances, Chapter 30 – Environment). The restrictions imposed by these ordinances do not apply to the proposed solar farm site.

Environmental Consequences – Under the No Action Alternative, the proposed solar farm would not be built and the agricultural land use of the site would not change.

Under the Action Alternative, the land use of the solar farm site would change from rural agricultural to rural industrial. Because the completed solar farm would be largely surrounded by a tree buffer and would not produce noise, odors or other air emissions, or a noticeable increase in traffic, it would have an insignificant effect on surrounding land uses. Land uses in the project area are not governed by zoning ordinances, and the solar farm would comply with applicable Union County land use-related ordinances, including those on water supply watershed protection, river corridor protection, mountain protection, and wetland protection. Impacts to land use would be minor and not adverse.

Soils and Prime Farmland

Existing Environment – Three soil types occur on the proposed solar farm site; one of these soil types is classified as prime farmland (Table 2). Prime farmland is land that is the most suitable for economically producing sustained high yields of food, feed, fiber, forage, and oilseed crops. The Farmland Protection Policy Act requires Federal agencies to take into account the adverse effects of their actions on prime or unique farmlands, in order to minimize conversion of farmland to nonagricultural uses.

The Dillard fine sandy loam classified as prime farmland occurs in two areas along the western edge of the site. The Clifton-Evard complex 6-10 percent slopes soil is concentrated in the southern portion of the site. None of the soil types on the site are classified as highly erosive or have other characteristics that would require special construction techniques or other non-routine measures.

Table 2. Soils on the proposed solar farm site.

Soil Type	Rating	Area (Acres)	Proportion of Area
Clifton-Evard complex, 6-10 percent slopes	Farmland of statewide importance	2.0	24.4 %
Clifton-Evard complex, 10-25 percent slopes	Not prime farmland	5.7	70.5 %
Dillard fine sandy loam, 2-6 percent slopes	Prime farmland	0.4	5.1 %

Source: USDA Natural Resources Conservation Service Web Soil Survey, <http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

Environmental Consequences – Under the No Action Alternative, there would be no project-related impacts to soils on or in the immediate vicinity of the proposed solar farm site.

Under the Action Alternative, a light-duty graveled access road would be constructed from T. Hughes Road to the site of the solar facilities, and the remainder of the site would be graded to more uniform slopes to facilitate installation of the PV arrays. As described above in the Water Resources section, implementation of the erosion control measures and prompt revegetation would minimize soil erosion and off-site transport of soils. Site grading and installation of a sediment basin could adversely affect up to 0.4 acres of prime farmland and 2.0 acres of farmland of statewide importance. The area of affected prime farmland is very small relative to the area of prime farmland in Union County. Overall effects on soils, including prime farmland would not be significant.

Visual Resources

Existing Environment – The proposed solar farm site is located in a rural area dominated by woodlands, farmland, old fields, and low density rural residences. Scenic attractiveness (a measure of human perceptions of landscape beauty and sense of place) of the area is common and scenic integrity (a measure of the degree of intactness or wholeness of the landscape character) is moderate. The site slopes to the west and southwest, with its highest elevations along its northern and eastern borders. Due to the rolling terrain, the location of the proposed PV panels is not visible from T. Hughes Drive which runs along the east side of the site. Part of the site is visible through a row of deciduous trees from a portion of Old Gumlog Road southwest of the site at a distance of about 0.25 mile. The site is not visible from other points along the surrounding public roads.

Environmental Consequences – Under the No Action Alternative, the proposed solar farm would not be built and there would be no project-related changes to the visual character of the area.

Under the Action Alternative, trees and shrubs would be removed from the solar farm site, the site would be graded, and several rows of PV panels and supporting infrastructure would be installed. The appearance of the area would be changed from pasture with scattered stands of trees to parallel rows of south-oriented PV panels with a maximum height of about 10 feet surrounded by planted evergreen trees. The PV panels would be shielded from T. Hughes Drive and from the houses along the drive opposite the site by the rolling terrain. The PV panels would be visible from a portion of Old Gumlog Road. Due to

Marshall Properties Solar Farm

their distance from the road and the terrain, they would comprise a small portion of the view from the road, and would be largely screened when the intervening trees are leafed out. The evergreen trees to be planted around the perimeter of the solar farm would provide additional screening as they mature. Overall, visual impacts would be insignificant and the visual character of the area would remain largely unchanged.

Noise

Existing Environment – The proposed solar farm site is located in a rural area where the primary sources of ambient noise are from farming equipment, traffic on nearby roads, wind, wildlife, and similar sounds. Noise levels in this type of area typically range from 45 to 55 dBA. dBA (A-weighted decibels) is a measure of noise level; a day-night average sound level of 55 dBA is commonly used as a threshold level for noise levels which could result in adverse impacts, and prolonged exposure to levels above 65 dBA is considered unsuitable for residential areas.

Environmental Consequences – Under the No Action Alternative, there would be no project-related changes to noise levels in the area.

Under the Action Alternative, construction activities would generate noise. Maximum noise levels produced by the construction equipment are in the range of 80 to 85 dBA at a distance of 50 feet from the equipment. The nearest occupied house is approximately 530 feet from the proposed location of the PV panels and related equipment, where construction activities would be concentrated. Nearby residents could experience elevated noise levels caused by construction equipment, but construction noise levels at nearby occupied houses would be likely less than 65 dBA and only occur for the short duration of the construction. Construction would be restricted to normal work hours on weekdays. The operation of the solar farm would not produce noise. The noise produced by maintenance activities, primarily periodic mowing, would be minor and similar to existing noises in the vicinity of the solar farm site. Overall noise impacts resulting from the Action Alternative would be insignificant.

Cultural Resources

Existing Environment – Cultural resources include prehistoric and historic archaeological sites, districts, buildings, structures, and objects, as well as locations of important historic events. Cultural resources that are listed on, or considered eligible for listing on, the National Register of Historic Places (NRHP) maintained by the National Park Service are called historic properties. As a Federal agency, TVA is required by the National Historic Preservation Act (NHPA) to assess the impacts of its actions on historic properties. The area of potential effects (APE) for evaluating the impacts on archaeological resources was defined as the 6.6-acre proposed solar farm site, and for historic architectural resources (e.g., buildings, districts, sites), the area in an 0.5-mile radius of the proposed solar farm site.

No information is available on previously recorded archaeological sites within the APE. TVA archaeologists inspected the site in December 2013. Although part of the site had been recently cleared, there was no evidence of archaeological resources. Due to the relatively steep slopes on the site, its topographical position, and absence of a nearby permanent source of water, the probability of archaeological resources eligible for listing on the NRHP is low.

The Georgia Historic Preservation Division files (<http://www.gnahrgis.org>) list three previously inventoried historic resources (houses) within the architectural APE. No others were identified during TVA's 2013 field survey. The three houses appear ineligible for the NRHP due to the lack of architectural distinction and loss of integrity due to neglect. A ca. 1930 house, not recorded in the Georgia files, is located close to the proposed solar farm access road. It does not appear eligible for the NRHP due to the lack of architectural distinction and loss of integrity due to neglect. Based on the field survey finding, TVA determined that there are no historic properties within the APE.

Environmental Consequences – Under the No Action Alternative, there would be no project-related impacts to cultural resources.

No archaeological or architectural resources are present in the APE and implementation of the Action Alternative, including the construction and operation of the proposed solar farm, would not affect historic properties. TVA has notified the Georgia State Historic Preservation Office and federally recognized Indian tribes of this determination (Appendix A).

Socioeconomics and Environmental Justice

Existing Environment – The proposed solar farm is located in a rural area near Blairsville, Union County, Georgia. The 2012 estimated population of Union County was 21,451 (US Census Bureau State & County QuickFacts). Minority populations made up two percent of the population living within one mile of the proposed solar farm site, close to the county proportion of three percent and considerably lower than the statewide proportion of 37 percent. Per capita personal income of residents within one mile of the proposed solar farm site was \$22,238, somewhat lower than the county and state per capita personal incomes of \$24,124 and \$25,383, respectively. The proportion of the population living below poverty level within one mile of the proposed solar farm site was similar to the 15.3 percent for the county and 16.5 percent for the state. Total employment in the county was 5,023 in 2011, and the major employment sectors were retail trade, health care, accommodation and food services, and transportation and warehousing.

Environmental Consequences – Under the No Action Alternative, there would be no project-related impacts on the socioeconomics or low-income or minority populations in the project area.

Under the Action Alternative, a small crew (less than 10) of workers would be employed for a few weeks to construct the proposed solar farm. These workers would be based outside the project area and would have little impact on the local economy. No local workers would be hired to operate the solar farm and periodic maintenance activities, primarily mowing, would be done by workers based outside the area or local contractors. There would be an increase in property tax payments to Union County due to the increased value of the site once the solar farm is completed.

Executive Order 12898 on Environmental Justice directs federal agencies to consider the impacts of their actions on minority and low-income populations and to avoid disproportionate impacts to those populations. The proposed action would not have any such disproportionate impacts because its overall impacts are minor and there are no concentrations of minority or low income populations in its vicinity.

Cumulative Impacts

Based on the level of anticipated impacts to the resources described above and the absence of other ongoing or proposed major construction or other projects in the surrounding area, TVA has determined that the proposed action would not result in any adverse cumulative impacts.

CHAPTER 4 – SUPPORTING INFORMATION

EA Preparers

Charles P. Nicholson, PhD

Experience: 35 years in Zoology, Endangered Species Studies, and NEPA Compliance
Involvement: NEPA Compliance and Document Preparation

Stephen C. Cole, PhD

Experience: 13 years in Cultural Resource Management, 4 years teaching Anthropology at
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Involvement: Cultural Resources

Holly G. LeGrand

Position: Terrestrial Zoologist
Involvement: Threatened and Endangered Animal Species and Terrestrial Ecology

Patricia B. Cox, PhD

Experience: 32 years in Plant Taxonomy; 10 years in Rare Species Monitoring, Environmental
Assessment, and NEPA Compliance
Involvement: Threatened and Endangered Species

Holly G. LeGrand

Experience: 9 years in Biological Surveys, Natural Resource Management, and Environmental
Reviews
Involvement: Threatened and Endangered Species

Literature Cited

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_____. 2013. Revised Range-wide Indiana Bat Summer Survey Guidelines, May 2013. USFWS. Available at: <http://www.fws.gov/midwest/endangered/mammals/inba/inbasummersurveyguidance.html>.

APPENDIX A - CORRESPONDENCE

Marshall Properties Solar Farm



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902

March 12, 2014

Dr. David Crass, Division Director
Georgia Department of Natural Resources
Historic Preservation Division
Attn: Environmental Review
254 Washington Street, SW
Ground Level
Atlanta, GA 30334

Dear Dr. Crass:

TENNESSEE VALLEY AUTHORITY (TVA), POWER PURCHASE AGREEMENT, 684-KW
SOLAR FARM NEAR BLAIRSVILLE, UNION COUNTY, GEORGIA

TVA proposes to enter into a 20-year Power Purchase Agreement (PPA) with Marshall Properties, LLC, to purchase electric power generated at their proposed 684-kilowatt (kW) solar farm on a 6.6-acre site near Blairsville, Union County, Georgia. The PPA would be executed through TVA's Renewable Standard Offer (RSO) program and would commit TVA to purchasing the power generated by the solar farm. The proposed PPA between TVA and Marshall Properties, LLC is an undertaking as defined at 36 Part 800.16(y).

We have enclosed documentation pursuant to 36 CFR 800.11(d) supporting TVA's finding of no historic properties affected and are **seeking your concurrence with this finding.**

Should you have any questions or comments, please contact Richard Yarnell at 865-632-3463 or wryarnel@tva.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clinton E. Jones', written over a horizontal line.

Clinton E. Jones
Manager
Biological and Cultural Compliance
Environment

SCC:CSD
Enclosures



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902

March 13, 2014

To Those Listed:

TENNESSEE VALLEY AUTHORITY (TVA), POWER PURCHASE AGREEMENT, 684-KW SOLAR FARM NEAR BLAIRSVILLE, UNION COUNTY, GEORGIA

TVA proposes to enter into a 20-year Power Purchase Agreement (PPA) with Marshall Properties, LLC, to purchase electric power generated at their proposed 684-kilowatt (kW) solar farm on a 6.6-acre site near Blairsville, Union County, Georgia. The PPA would be executed through TVA's Renewable Standard Offer (RSO) program and would commit TVA to purchasing the power generated by the solar farm. The proposed PPA between TVA and Marshall Properties, LLC is an undertaking as defined at 36 Part 800.16(y).

We have enclosed documentation pursuant to 36 CFR 800.11(d) supporting TVA's finding of no historic properties affected.

Pursuant to 36 CFR Part 800.3(f)(2), TVA is consulting with the following 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 listing in the National Register of Historic Places (NRHP): Cherokee Nation, Eastern Band of Cherokee Indians, United Keetoowah Band of Cherokee Indians in Oklahoma, Muscogee (Creek) Nation of Oklahoma, Alabama-Coushatta Tribe of Texas, Kialegee Tribal Town, Thlopthlocco Tribal Town, Poarch Band of Creek Indians, Seminole Nation of Oklahoma, Absentee-Shawnee Tribe of Oklahoma, Eastern Shawnee Tribe of Oklahoma, and the Shawnee Tribe.

By this letter, TVA is providing notification of these findings and is seeking your comments regarding this undertaking and any properties that may be of religious and cultural significance and may be eligible for listing in the NRHP pursuant to 36CFR §§ 800.2 (c)(2)(ii), 800.3 (f)(2), and 800.4(a)(4)(b).

Please respond by April 13, 2014, if you have any comments on the proposed undertaking. If you have any questions, please contact me in Knoxville, Tennessee, at (865) 632-6461 or by email at pbezzell@tva.gov.

Sincerely,

A handwritten signature in black ink that reads "Pat Bernard Ezzell".

Patricia Bernard Ezzell
Tribal Liaison and Corporate Historian
Public Relations and Corporate Information
Communications
WT 7D-K

PBE:CSD
Enclosures

Marshall Properties Solar Farm

IDENTICAL LETTER MAILED TO THE FOLLOWING ON MARCH 13, 2014:

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