
**TWIN CREEKS RESORT AND MARINA ON TIMS FORD
RESERVOIR SECTION 26A APPROVAL
SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT AND
FINDING OF NO SIGNIFICANT IMPACT
Franklin County, Tennessee**

Prepared by:
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Acronyms

BMP	Best Management Practices
EA	Environmental Assessment
FONSI	Finding of No Significant Impact
NEPA	National Environmental Policy Act
TDEC	Tennessee Department of Environment and Conservation
TVA	Tennessee Valley Authority
USACE	U.S. Department of Army, Corps of Engineers
USFWS	U.S. Fish and Wildlife Service

The Proposed Action and Need

In 2018, the Tennessee Valley Authority (TVA) received a request from Dockscapes for approval of modifications to a 26a permit for Twin Creeks Resort and Marina on Tims Ford Reservoir in Franklin County, TN (Figure 1). TVA previously evaluated the construction of the resort and marina under the January 2017 *Twin Creeks Resort and Marina on Tims Ford Reservoir Section 26A Approval Final Environmental Assessment* (EA) and issued a Finding of No Significant Impact (FONSI). TVA issued a permit under Section 26a of the TVA ([Section 26a Regulations](#)) on February 9, 2017, granting approval for development of the marina and use of TVA lands for associated commercial recreation facilities. The 2017 EA and FONSI can be found at www.tva.gov/nepa.

As evaluated in the original EA, TVA proposed that Dockscapes phase their development of the area, which allowed construction and operation of marina boat slips and various land-based construction under Phase I. The applicant is seeking approval under Section 26a for Phase II of the marina development and commercial recreation facilities and has proposed numerous modifications to the proposal evaluated by TVA in the 2017 EA. Proposed modifications can be found in Table 2.

The proposed project area is included in the original footprint that is currently under development by Dockscapes and spans 55 acres of TVA fee property under easement (See Figure 2, a map from the original EA) and approximately 20 acres of Tennessee Department of Environment and Conservation (TDEC) property. To date, the main road has been installed, the marina parking area is in place, and 100 marina slips have been constructed under the approved 26a permit Phase I. As discussed in the 2017 EA, the project would provide camping and boating recreational opportunities for the general public on Tims Ford Reservoir, consistent with TVA's mission to promote economic development in the Tennessee River Valley and its stewardship management objectives of providing recreational opportunities and enjoyment of public lands and reservoirs. TVA is evaluating the requested modifications under this supplemental environmental assessment (SEA), which will analyze the potential environmental impacts. The 2017 EA and FONSI are incorporated herein by reference.

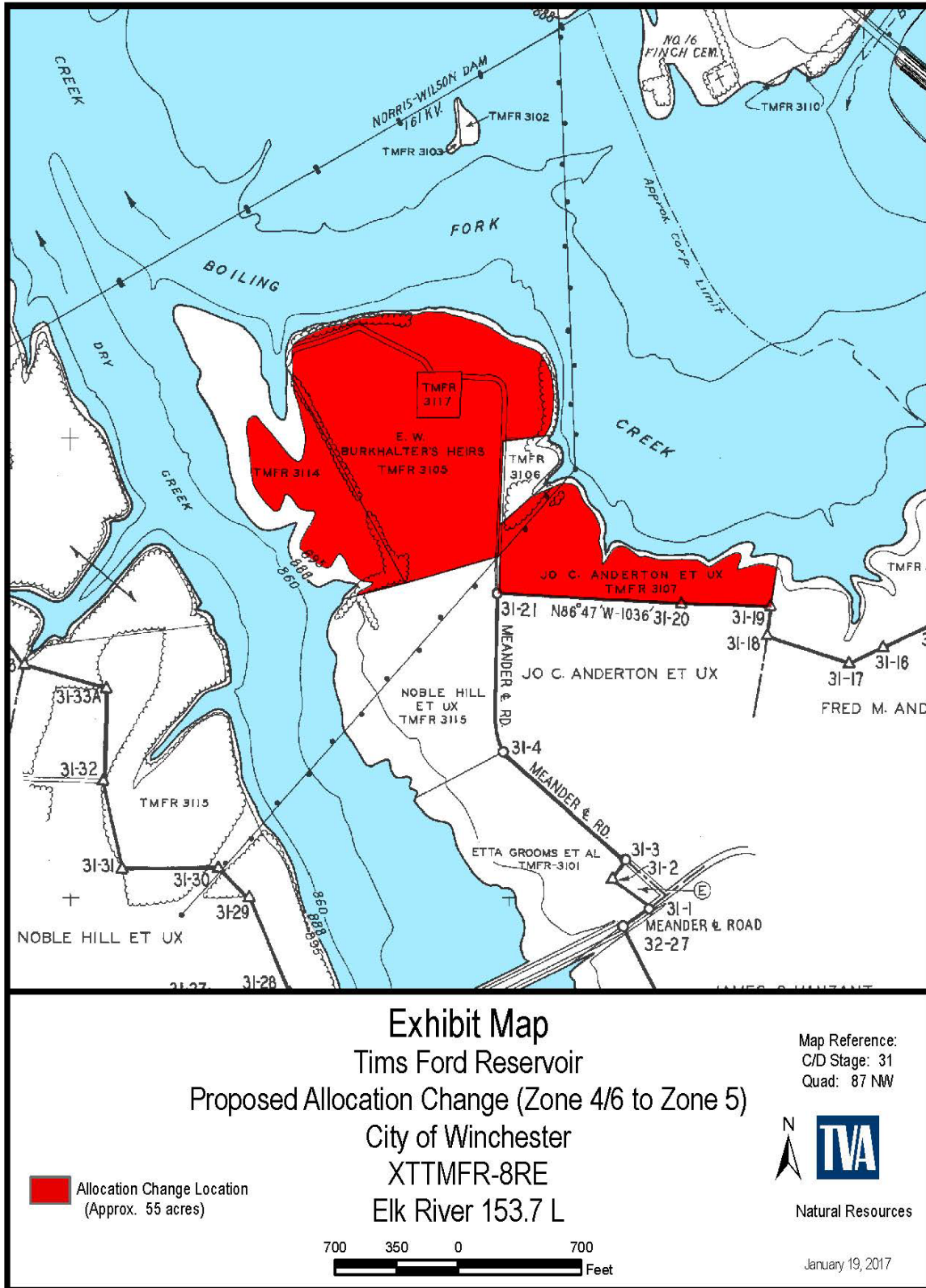


Figure 2 - Location of TVA Lands within Project Area

Public Involvement

The applicant submitted a joint application to TVA and the USACE in October 2015. The USACE issued Joint Public Notice 16-27 on July 27, 2016 ([2017 EA w/ attachments](#)). The USACE received a comment letter from the U.S. Fish and Wildlife Service (USFWS) that stated the project area likely contains suitable habitat for the Indiana bat and northern long-eared bat. The USFWS recommended any disturbance of these areas be avoided and minimized and requested coordination with the USFWS prior to issuance of a permit.

In December 2016, TVA posted the draft EA on its website for a 30-day public comment period and requested the public to submit comments via mail, email or online comment form. TVA also published a notice requesting comments in The Herald Chronicle newspaper on December 9, 2016. TVA did not receive any comments during the comment period.

As noted above, based on the findings and analysis in the 2017 EA, TVA issued a Finding of No Significant Impact (FONSI) on January 26, 2017. The FONSI concluded the project would not be a major federal action significantly affecting the environment; therefore, an environmental impact statement was not required.

Alternatives

Preliminary internal scoping by TVA determined, from the standpoint of the National Environmental Policy Act (NEPA), there are two alternatives available to TVA: the No Action Alternative and the Proposed Action Alternative.

The No Action Alternative

Under this alternative, the contractor's requested modifications to the Twin Creeks Resort and Marina proposal would not be approved and TVA would issue a new Section 26a permit for the approved Phase II construction activities. Because TVA has already reviewed and issued a permit to Dockscapes for its original proposal, the No Action Alternative in this case includes the development of the resort and marina under the terms of the approved project plan, as adequately analyzed in the 2017 EA; therefore, no additional consultation is needed.

The Proposed Action Alternative

Under the Proposed Action Alternative, TVA would approve the contractor's requested modifications to the project plan (Figure 3). TVA would issue a new Section 26a permit in accordance with the applicant's requested modifications for Phase II. All additional permits would be obtained prior to construction activities.

The applicant's proposed amendments include eliminating approximately 100,000 square feet of land-based construction activities from the original proposal. The proposal would also reduce the overall boating units the project contributes to the reservoir. A boating density study was conducted in 2009 for Tims Ford Reservoir. Its findings were used to evaluate the boating density for the 2017 EA for Tims Ford Reservoir. The 2017 EA found the optimal density threshold range is 6.0-7.6 water surface acres per unit on a peak summer holiday. That is, boating density should not exceed the low limit of 6 surface water acres per boat. With the reduction in scope for boating units in the new proposal, the new boating density analysis resulted in a calculation of 10.49 surface water acres per boating unit on an average summer weekday and 7.87 surface acres on a peak summer holiday

weekend. Therefore, the boating density remains well above the threshold range and is not expected to impact recreational resources or the recreational boating experience on Tims Ford Reservoir.

TVA's preferred alternative is the Proposed Action Alternative. The following modifications are proposed by Dockscapes:

Table 1. Proposed Modifications

Resource Area	Amendments to Original Scope of Work (Area sizes approximated)
Land Based Activities	<ul style="list-style-type: none"> • Eliminate the dry storage facility and construct 11 cabins at the location • Delete parking lot #2 at the boat ramp (50,554 square feet) • Eliminate boat dealership facility (16,000 square feet) • Eliminate hotel #2 (7,200 square feet) and relocate wedding chapel to hotel site #2 • Relocate R/V and campsites and reduce by 22 total sites • Add concession stand (50'x100'), pavilion (50'x60'), public restroom (20'x30'), 75 parking spaces, vineyard to left of main entrance • Construct 100'x100' maintenance facility • Add a picnic pavilion (24'x24') with a grass lawn • Combine the proposed hotel #1 with a restaurant, retail, and swimming pool as permitted (26,543 square feet)
Marina	<ul style="list-style-type: none"> • Add seventeen 10'x24' floating non-covered docks at cabin sites • Phase II dock facilities will increase by 2 slips • Decrease courtesy slips in marina to 24 from 60 (the amount on original permit)

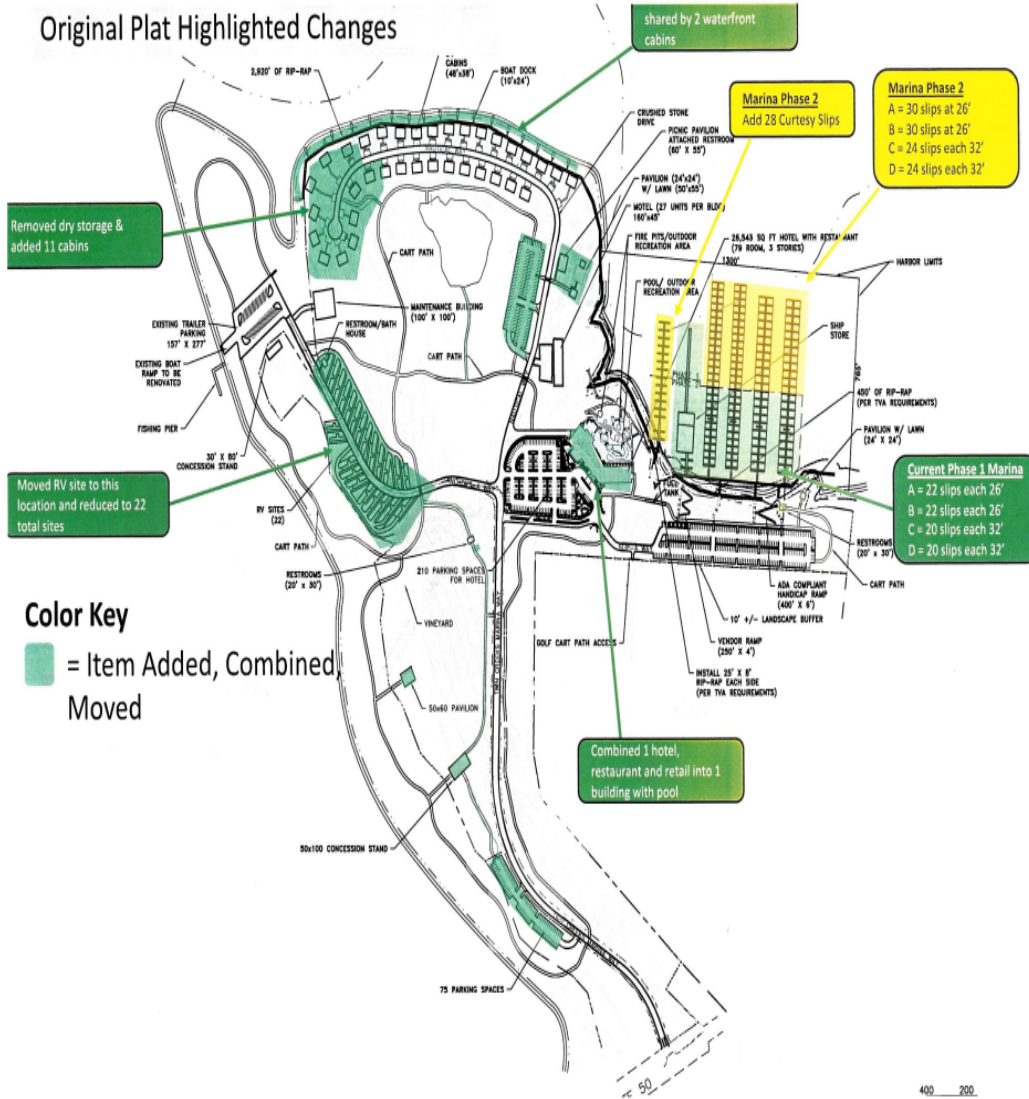


Figure 3 – Original Plat with Highlighted Changes

Affected Environment and Anticipated Impacts

TVA incorporates by reference the description of the affected environment of the project area included in the 2017 EA.

The No Action Alternative

Under the No Action Alternative, Dockscapes would implement its project as originally proposed and described in the 2017 EA. The potential impacts of the No Action Alternative were previously reviewed by TVA in the 2017 EA as the Proposed Action Alternative. To complete that analysis, TVA used an environmental checklist to review for potential impacts (see the [2017 EA with attachments](#)). TVA identified potentially affected resources in the project area and determined the proposed action would have no effect on endangered, threatened, or special status plant or aquatic species; aquatic ecology; natural areas; scenic rivers; prime farmland; or groundwater. Potential impacts to other environmental resources were evaluated in the EA’s analysis of the proposal and are incorporated herein by reference. As discussed in its 2017 FONSI, TVA found that impacts associated with this alternative would not result in significant environmental impacts.

The Proposed Action Alternative

Under the Proposed Action Alternative, TVA anticipates that impacts of construction activities within the Twin Creeks Resort and Marina would be the same as described in the 2017 EA. TVA has reviewed the proposed modifications and documented potential environmental impacts in this SEA related to the change in scope in the following table.

Table 2. Analysis of Environmental Impacts

Resource Area	Alternative A – No Action	Alternative B – Action Alternative
Water Quality	Under the no action alternative, impacts to waters of the U.S. cannot be avoided due to construction activities. To minimize impacts, the applicant reduced riprap to 1500 linear feet and eliminated dredging from the project.	Construction activities on land, along the shoreline, and on water have the potential to affect water quality. The applicant would use best management practices (BMP) during these activities to minimize impacts to water quality. The applicant has applied for a permit from TDEC pursuant to Section 401 of the Clean Water Act and from the USACE pursuant to Section 404 of CWA for bank stabilization activities and other proposed actions.
Visual Effects	Construction, as originally proposed, would create visual discord during the duration of the project; however, once complete the resort and marina will have the same visual impact consistent with the character of the area.	Much of the marina was constructed under Phase I, along with the development’s main road and marina parking area; however, the majority of land-based construction would occur in Phase II. Therefore, under the action alternative, construction would create additional visual discord during the project duration.

Recreation	The marina, as previously approved, would provide benefits for local residents, tourists, and potential homeowners. An increase in boating traffic is likely to occur, but it is not anticipated the reservoir will exceed optimal recreational user capacity.	Same as the No Action Alternative. TVA reevaluated the extent to which the development would affect boating density on Tims Ford Reservoir and found that project modifications would reduce the recreational user capacity from the original scope. Based on the updated calculation, TVA estimates that there would be 10.49 surface water acres per boating unit on an average summer weekday and 7.87 surface water acres per boating unit on a peak summer holiday weekend. The optimal range is 6.0-7.6 surface water acres per boating unit; therefore, the boating density threshold would not exceed the low limit of 6 surface water acres per boat during an average summer weekday or peak summer holiday weekend.
Threatened and Endangered Species	Construction of the project as originally scoped will have no effect on threatened, endangered, or special plants or aquatic species (USFWS acknowledged TVA's no effect determination on 10/14/16); TVA identified 20 individual suitable habitat trees for the Indiana bat and northern long-eared bat on TVA lands in the project area. Potential bat roosting habitat would require BMPs during construction; trees were marked with blue and white flagging and were avoided during Phase I activities as required by the USFWS.	A site visit was conducted by TVA subject matter experts on Wednesday, March 6, 2019. TVA Terrestrial Zoologist identified 9 additional trees as suitable habitat trees for bats, for a total of 29. The 20 trees originally identified would still require BMPs and must be avoided during construction to stay in compliance with the USFWS concurrence received under the 2017 EA. The 9 newly identified bat habitat trees would be removed in summer or fall. Removal of suitable summer roosting habitat for Indiana bat and northern long-eared bat at the time when the bats could be present on the landscape is an activity addressed in TVA's programmatic consultation with the U.S. Fish and Wildlife Service on routine actions and federally listed bats in accordance with ESA Section 7(a)(2) and completed in April 2018. For those activities with potential to affect bats, TVA committed to implementing specific conservation measures. These activities and associated conservation measures are identified on page 5 of the TVA Bat Strategy Project Screening Form (attached) and need to be reviewed/implemented as part of the proposed project.

Air Quality	Under the no action alternative, impacts from construction activities will be temporary in nature; impacts from the operation of the marina would primarily be related to emissions from increased boat traffic. There would be no direct, indirect, or cumulative impacts.	Same as the No Action Alternative. No direct, indirect, or cumulative impacts to air quality are anticipated.
Navigation	Harbor limits will not exceed 765'x1300' on Boiling Creek and 200'x400' on Dry Creek as per TVA's 26a permit; construction activities will have no impacts on navigation.	The Phase II construction of 194 boat slips (58' wide, featuring 26') would not exceed previously agreed upon harbor limits; therefore, no negative impacts to navigation would be expected. TWRA was consulted and has no objections to marina expansion in reference to safety concerns.
Archaeological and Historical Resources	SHPO identified two sites of undetermined status within the APE; applicant maintained a buffer around the potentially listed sites and will remain a greenspace; no mechanical equipment allowed within the buffer; removal of invasive species will be done by hand; walking trail will be located on an existing ATV trail with no additional grading; gravel placed along path to minimize erosion.	Same as the No Action Alternative. No eligible properties would be affected by the proposed modification through best management practices.

TVA will carry forward the commitments from the 2017 Twin Creeks Resort and Marina EA.

Conclusion and Findings

Based on the findings in this Supplemental Environmental Assessment, we conclude that the proposed action to approve Dockscape's request for a 26a permit under the TVA for Phase II and project modifications would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.



06/07/2019

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References

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