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WATERSIDE RECREATIONAL VEHICLE DEVELOPMENT SECTION 26A APPROVAL ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

Rhea County, Tennessee

EAXX-455-00-000-1753261594

Prepared by:
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Introduction and Background

The Tennessee Valley Authority (TVA) received a Section 26a application for the construction and operation of a new recreational vehicle (RV) development on Chickamauga Reservoir, River Mile 512.2R at Cottonport Road, Dayton, Rhea County, Tennessee. The proposed development would occur on approximately 58 acres of private land that is partially encumbered by restrictive deed covenants and flowage easement rights granted to TVA.

TVA's action (Proposed Action) includes the approval of the Applicant's request to obtain a Section 26a permit allowing the placement of fill and other structures within TVA's Section 26a jurisdiction. TVA's Section 26a jurisdiction applies to all portions of the Applicant's Site that fall within the 500-year floodplain of the Tennessee River and/or land encumbered by TVA's flowage easement rights, whichever is higher. In some sites, the 500-year floodplain extends further upland than TVA flowage rights; in other sites, TVA flowage rights extend further upland than the 500-year floodplain.

To ensure that the potential effects of the Proposed Action are properly analyzed, this Environmental Assessment (EA) will address resources present within the project site, Figure 1. The proposed project site is currently a mix of tree/shrub and open grass fields which are surrounded by rural residential properties. The project site abuts the Chickamauga Reservoir to the south, Cottonport Road to the north, and the Cottonport Unit of the Chickamauga Wildlife Management Area (herein referred to as Cottonport WMA) to the east. The site is currently located in the 500-year floodplain and has two streams and three wetlands that intersect the property.

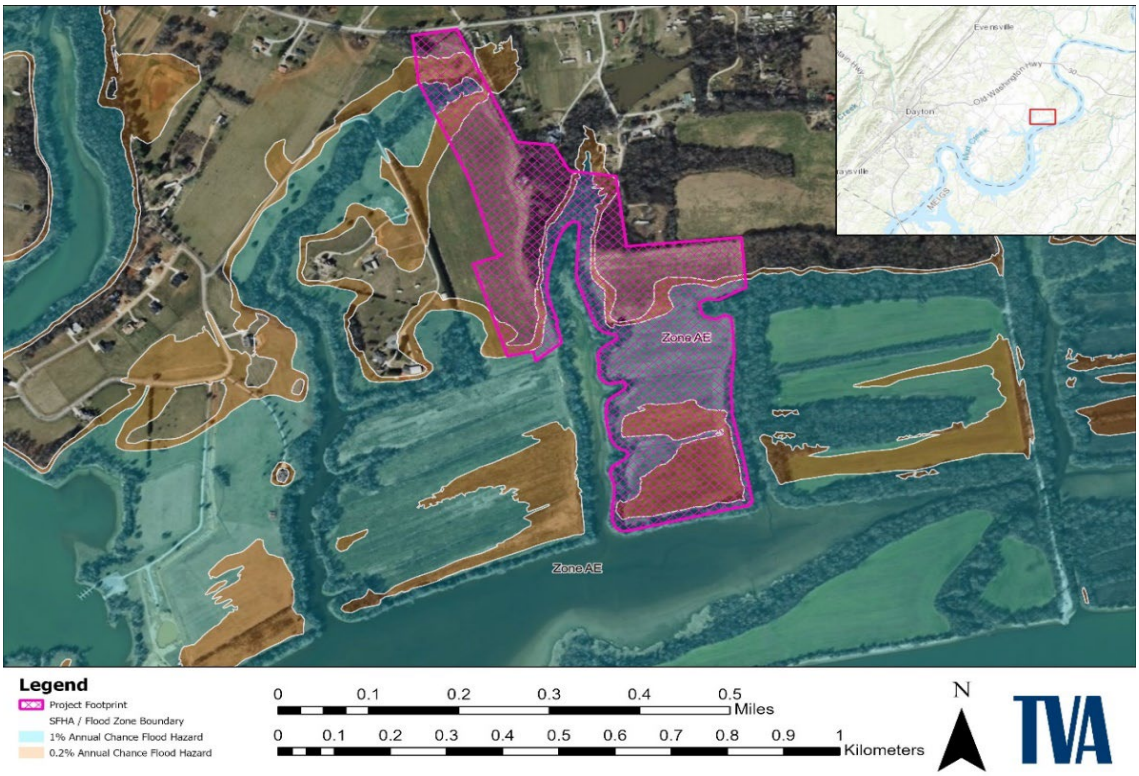


Figure 1. Project Location Map

Purpose and Need

The purpose of the proposed action is to issue a Section 26a permit for the construction and operation of a 58-acre RV development and water use facilities with supporting infrastructure and community facilities on private land adjacent to TVA-managed shoreline along Chickamauga Reservoir in Rhea County, Tennessee. The proposal is consistent with TVA's mission of service and meets TVA's goal of providing recreational opportunities in the Tennessee Valley Region.

Due to the site's existing topography, project preparation would involve grading, balancing cut-and-fill materials, and placing onsite material within the 500-year floodplains to achieve the necessary elevations for RV development. The proposed fill is essential to accommodate the applicant's development plans.

Under Section 26a of the TVA Act, TVA is required to review the construction and placement of structures, including fill, that could affect navigation, flood control, or public lands within the reservoir or floodplains. Issuance of the Section 26a permit would authorize the placement of fill below the 500-year flood elevation and within the designated floodplains of the Tennessee River and Chickamauga Reservoir.

Proposed Action

TVA proposes to issue a Section 26a permit to Atlas American Properties, LLC for the construction and operation of Waterside RV Park on Chickamauga Reservoir in Rhea County, Tennessee. The proposed development would occur on approximately 58.0 acres. The total project includes the development of 140 individual RV campsites with amenities throughout the development. Although the majority of the development would occur on the applicant's property, a proposed dock and other connected actions on TVA-managed land require TVA's review under Section 26a and fall within the 500- year floodplain. Planned community amenities include an office, clubhouse, swimming pool, pickleball courts, dog park, restrooms, laundry facilities, kitchen, playground and a high-elevation RV storage site. Ten covered grill stations would be constructed on concrete pads measuring 30 feet by 20 feet with an 8-foot height. A paved drive, 50 feet wide and 6,000 feet long with a depth of 2 feet, would be constructed with associated grading. The project also includes excavation of a 0.8-acre pond with a maximum depth of 8 feet; dredged material from the pond would be reused on site as fill during construction. The grading and earthwork would result in no net fill within the 100-year floodplain, Power Storage Zone, or Flood Storage Zone. One barn is located on the property that is expected to be demolished. No trees larger than three inches in diameter would be removed.

Construction activities would include site grading, excavating and trenching, which involves the placement of onsite fill material within the 500-year floodplain to achieve the necessary elevations for development. The applicant has designed the project to ensure that no flood damageable developments would be located within the 500-year floodplain upon completion of grading. Each campsite would be equipped with underground utilities, including electric, water, and sewer connections. Utility installation would require trenching approximately 3 feet deep by 1 foot wide, and the placement of 5-foot by 4.5-foot step tanks at each site.

If approved, construction is expected to begin within six to eight months after permit issuance, with initial site clearing anticipated in winter or spring of 2026. During site construction, the Applicant anticipates a workforce of 15 to 20 people but could grow to as many as 35 people during utility and paving operations. Grading to develop road, utility, and landscape infrastructure would be conducted to support the project. Various grading and

construction equipment typically associated with land development and installation of infrastructure would be used (e.g., excavators, bulldozers, skid steer loaders, motor graders, trenchers, scrapers, etc.).

Wastewater generated by the development would be managed through an on-site treatment system, which includes a treatment plant measuring 23 feet by 12 feet by 12 feet. The system comprises two 15,000-gallon fiberglass tanks, one 20,000-gallon fiberglass tank, and a subsurface disposal field. The entire wastewater facility would be situated above the 500-year floodplain but is analyzed in this EA due to it being a connected action. Shoreline activities, such as mowing or bush hogging, are expected to have minimal impacts on shoreline erosion due to the gentle 0–5 percent slope and the presence of emergent wetland vegetation, including cattails and bulrush. With the implementation of best management practices (BMPs) consistent with TVA's Section 26a Standard Conditions of the 26a permit, impacts to water flow, stream banks, and stream channels are expected to be minimal. Additionally, a fixed T-shaped community dock (30 feet by 4 feet) with a 30-foot by 6-foot fixed walkway would be constructed on driven pilings on TVA fee-owned land.

The Applicant anticipates the RV development construction work within the project site, including the cut and fill operation, construction of the wastewater plant, RV sites, and recreational spaces to start in the Spring of 2026. The timeframe for overall Site construction is anticipated to take 12 to 36 months to complete, including utilities. During the fill portion of construction, the Applicant anticipates a workforce of 15 to 20 people but could grow to as many as 35 people during utility and paving operations. The workforce would likely come from the local and regional pool of contractors.

Grading to develop road, utility, and landscape infrastructure would be conducted to support the project. Various grading and construction equipment of the type typically associated with land development and installation of infrastructure would be used (e.g., excavators, bulldozers, skid steer loaders, motor graders, trenchers, scrapers, etc.).

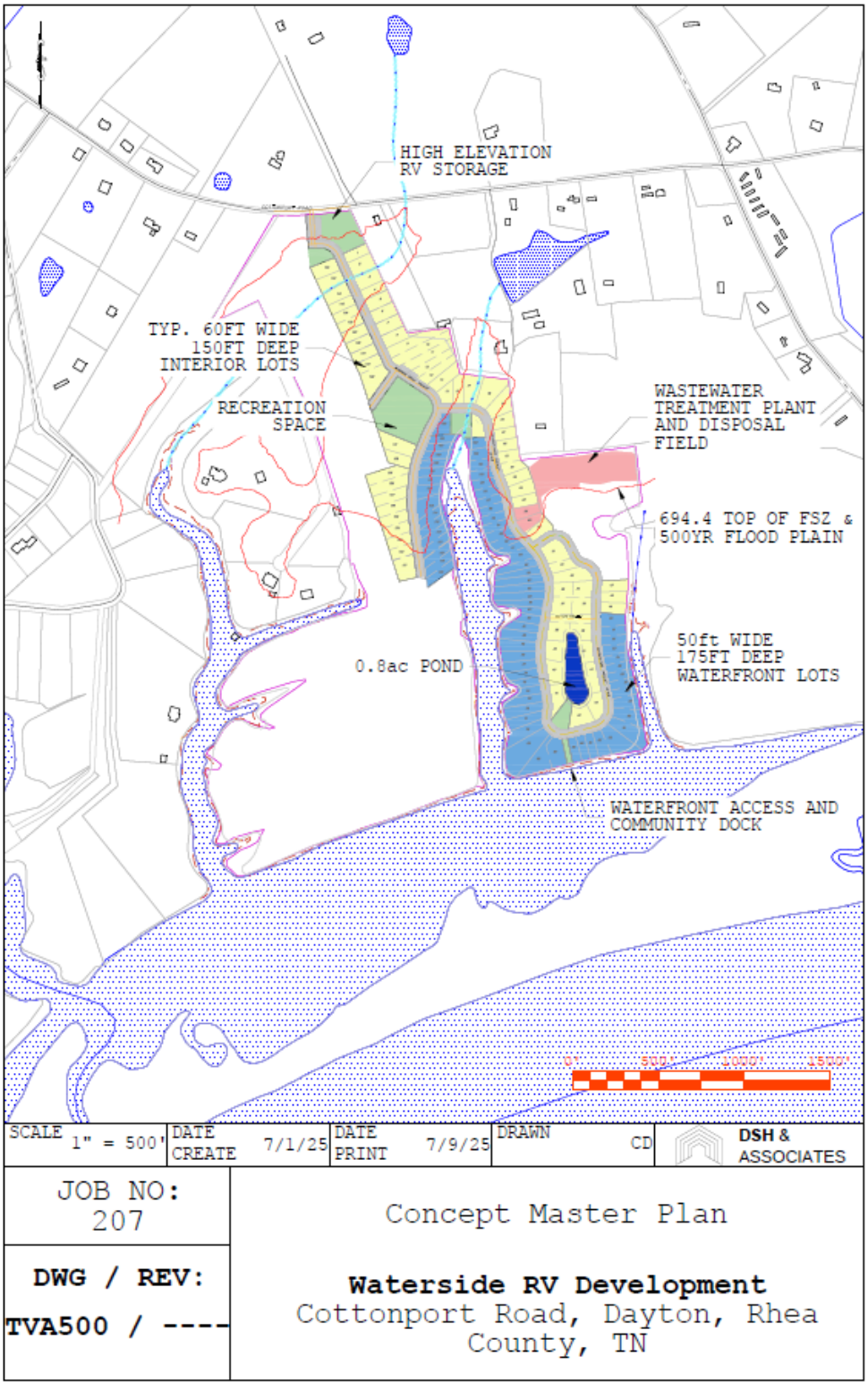


Figure 2. Overview of the Applicant's Proposed Development

Public and Agency Involvement

For the proposed RV campground development on Chickamauga Reservoir, coordination with federal, state, and tribal agencies is typically required to ensure compliance with environmental, cultural, and public safety regulations. Prior to submitting their Section 26a permit application, the Applicant engaged in public and agency outreach regarding the proposed project. This outreach included coordination with the Rhea County Planning Commission and the City of Dayton's Mayoral office of Jim Vincent, both of which were in favor of the proposed project, a 30-day public comment period, and five separate public meetings.

During this environmental review, TVA consulted with federal and state agencies. In compliance with Section 106 of the National Historic Preservation Act (NHPA), TVA consulted with the Tennessee State Historic Preservation Office (TN SHPO) and federally recognized Indian tribes. The TN SHPO concurred with TVA's finding of no effect to historic properties. TVA received no objections from the consulted Tribes on the proposed undertaking.

Due to the proposed project's proximity to the Cottonport WMA, TVA coordinated with the Tennessee Wildlife Resources Agency (TWRA) on September 12, 2025, to discuss potential impacts of the proposed project on local wildlife and habitat. As a result of this coordination efforts, the applicant would be responsible for contacting TWRA directly to determine and implement any required mitigation measures to minimize environmental impacts and ensure compliance with applicable regulations.

Documentation of agency consultation and correspondence is included in the Attachments section. This includes records of communication with relevant federal, state, and local agencies, as well as any determinations, recommendations, or conditions provided during the coordination process.

Related Environmental Reviews

Related environmental documents and materials were reviewed concerning this assessment and are listed below. The contents of these documents help describe the affected properties and are incorporated by reference as appropriate.

- *Robert Scott Baker Environmental Assessment***-** In October 2006, TVA approved a deed modification for an 8.22-acre parcel located on Chickamauga Reservoir in Rhea County, Tennessee. This parcel is part of a larger 115-acre tract owned by Mr. Baker, who at the time proposed developing a residential subdivision of approximately 70 homes. The same tract is now partially included within the boundaries of the current Waterside RV Development EA. The 2006 EA was reviewed during TVA's initial discovery phase for the current project to identify any potential issues or constraints associated with the overlapping sites.

Alternatives Considered

In accordance with guidelines outlined in the National Environmental Policy Act (NEPA), TVA has determined that there are two alternatives for consideration of the proposed project: Alternative A – the No Action Alternative and Alternative B – the Proposed Action Alternative.

Alternative A – No Action Alternative, Denial of Section 26a Permit

Under the No Action Alternative, TVA would deny the Applicant's request for a Section 26a permit for the proposed RV campground and associated facilities. As a result, the new commercial RV development would not be constructed on Chickamauga Reservoir. Any activities occurring solely on private land would not be subject to TVA approval unless they fall within sites subject to TVA's Section 26a jurisdiction, such as the 500-year floodplain. Because the proposed development would not proceed under this alternative, no impacts to environmental resources under TVA jurisdiction would occur. The No Action Alternative does not meet the Applicant's purpose and need; however, it serves as the baseline for comparison with the Proposed Action Alternative.

Alternative B – Proposed Action Alternative, Approval and Issuance of Section 26a Permit for the Construction of the Waterside RV Development

Under the Action Alternative, TVA would issue a Section 26a permit to Atlas American Properties, LLC (The Applicant) for the construction and operation of a new RV development on Chickamauga Reservoir in Rhea County, Tennessee and would allow the Applicant to place on-site fill materials within the 500-year floodplain of the Tennessee River and Chickamauga Reservoir. By allowing these actions, the Section 26a permit would facilitate the development of the Applicant's master-planned RV development for the community. Figure 1 displays the location of TVA's project site (approximately 58 acres) which includes the Applicant's overall property boundary. TVA has identified Alternative B as the preferred alternative.

Environmental Impacts Evaluated

TVA is considering whether to approve or deny the Applicant's request to obtain a Section 26a permit for the construction and operation of a 58-acre RV development and water use facilities with supporting infrastructure and community facilities on private land adjacent to Tennessee Valley Authority (TVA)-managed shoreline along Chickamauga Reservoir in Rhea County, Tennessee.

This EA evaluates the potential environmental impacts of the proposed action by examining the existing environmental conditions within the Project Site. The analysis considers a range of resource categories consistent with TVA's NEPA procedures and applicable federal guidance. Resources evaluated include land use, geology and soil, water resources (including surface water, groundwater and wetlands), air quality, climate, noise, ecological resources (including vegetation, wildlife, aquatic resources and federally and state listed species), cultural and historic resources, socioeconomics, transportation, visual resources, and human health and safety. Each resource site is assessed for potential reasonably foreseeable future action resulting from the approval of the Waterside RV development. Resources not present or not expected to be affected by the proposed Action Alternative are briefly discussed and dismissed with appropriate justification.

Resources Not Impacted

Based on TVA's preliminary review and site-specific conditions, the following environmental resource sites were determined to be either absent from the Project site or not subject to potential impacts from the proposed action. Therefore, these resources are not carried forward for detailed analysis in this EA. This determination is based on the nature of the proposed action, and the absence of plausible impact pathways. Justifications for the

exclusion of each resource are provided below and are consistent with TVA's NEPA procedures and applicable federal guidance.

- **Navigation** - The proposed action would not adversely affect navigation on Chickamauga Reservoir or the Tennessee River. The construction and operation of the Waterside RV Park, including the installation of a fixed T-shaped community dock on TVA fee-owned land, has been designed to avoid interference with navigable waters. The dock would be constructed on driven pilings and would not extend into the main channel or obstruct established navigation routes. Additionally, the dock's dimensions (30 feet by 4 feet with a 30-foot by 6-foot walkway) are modest and consistent with recreational use, posing no hazard to commercial or recreational vessel traffic. TVA's Section 26a review process ensures that all shoreline and in-water structures are evaluated for potential impacts to navigation. With adherence to TVA's standard conditions and coordination with the U.S. Army Corps of Engineers, the project is not expected to impair navigability or public access to the reservoir. Therefore, this resource was not further evaluated.

- **Air Quality** - The proposed action is not expected to result in significant impacts to air quality. Construction activities associated with the Waterside RV Park, including grading, excavation, utility installation, and paving, would generate temporary and localized emissions of particulate matter (dust) and vehicle exhaust from construction equipment. These emissions would be short-term in nature and are not anticipated to exceed National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency (EPA). The project site is located in a region currently designated as in attainment for all criteria pollutants. Best management practices (BMPs), such as dust suppression through water application and proper maintenance of construction equipment, would be implemented to minimize emissions. Once operational, the RV park would not be a significant source of air pollutants, as it is a low-emission land use with no industrial processes or large-scale combustion sources. Therefore, the project would not result in adverse impacts to local or regional air quality. Therefore, this resource was not further evaluated in this EA.

- **Greenhouse Gases** - The proposed action would result in minimal greenhouse gas (GHG) emissions and is not expected to contribute significantly to climate change. Temporary emissions of carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) would occur during construction activities due to the operation of diesel-powered equipment and construction vehicles. These emissions would be short-term and localized, and would not exceed thresholds that would trigger regulatory review under federal climate policies. Once operational, the Waterside RV Park would generate only minor GHG emissions associated with vehicle use by visitors and electricity consumption for amenities. The development does not include any industrial processes or large-scale combustion sources. Additionally, the project's design includes the reuse of onsite materials for fill, which reduces the need for offsite transport and associated emissions. Overall, the project's contribution to regional or national GHG inventories would be negligible, and no significant impacts to climate change are anticipated.

Resources Impacted from the Proposed Action

Impacts to the following resources were evaluated in further detail:

- Prime Farmland
- Cultural Resources
- Land Use
- Wetlands
- Terrestrial Ecology (Plants)
- Floodplains
- Terrestrial Ecology (Wildlife including Threatened and Endangered Species)
- Terrestrial Ecology (Threatened and Endangered Species)
- Managed and Natural Sites
- Parks and Recreation
- Socioeconomics
- Transportation
- Aquatic Ecology
- Surface Water
- Geology and Soils
- Visual Resources
- Noise
- Solid and Hazardous Waste

Prime Farmland

Prime farmland is defined by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) as land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops. It is not excessively erodible or saturated with water, and it possesses adequate moisture and temperature regimes, favorable soil chemistry, and appropriate growing season length. Prime farmland is protected under the Farmland Protection Policy Act (FPPA) (7 U.S.C. 4201 et seq.), which aims to minimize the conversion of agricultural land to non-agricultural uses.

To assess the presence of prime farmland within the project site, soil survey data from the NRCS Web Soil Survey (WSS) was reviewed. Soils were evaluated based on their classification and suitability for agricultural production. Additionally, coordination with local NRCS offices was conducted to verify the presence of designated prime farmland and to determine if the project site falls under FPPA jurisdiction.

The project site encompasses approximately 58 acres, of which 44.8 acres are classified as prime farmland according to NRCS soil survey data. These soils include several loams, which are recognized for their high productivity and minimal limitations for agricultural use. The site is currently used for agriculture purposes.

In accordance with FPPA requirements, Form AD-1006 was completed and submitted to the NRCS. This form is used to develop a score of the potential impacts to prime farmland, with scores above 160 requiring the evaluation of additional alternatives. The resulting Farmland Conversion Impact Rating for this project was 156, indicating that no further consideration under FPPA is required. Therefore, while some prime farmland may be affected, the impacts would be minor.

No Action Alternative

Under the No Action Alternative, the proposed project would not be implemented. While the No Action Alternative would avoid any direct impacts to natural resources, including soils, water quality, and prime farmland, it would not meet the purpose and need of the project. The land would remain available for agricultural use, which could result in adverse or beneficial long-term effects to prime farmland soils, depending on the agricultural practices and methods used.

Action Alternative

Implementation of the Proposed Action would result in temporary and permanent impacts to the project site, including potential disturbance to soils, vegetation, and land use. As noted above, the project would affect designated prime farmland; however, coordination with the NRCS and completion of Form AD-1006 resulted in a Farmland Conversion Impact Rating of 156, which is below the threshold of 160 and indicates that the impact would be minor. The Proposed Action is expected to meet the project's objectives while maintaining compliance with applicable environmental regulations.

Cultural Resources

Cultural resources include pre-contact and historic archaeological sites, districts, buildings, structures, and objects, as well as locations of important historic events that lack material evidence of those events. Historic architectural structures are also cultural resources and include buildings, structures, sites, districts or objects (e.g., houses, barns, dams, power plants) and are 50 years of age or older. The eligibility of a resource for inclusion in the NRHP is based on the Secretary of the Interior's Criteria for Evaluation (36 CFR § 60.4) For an identified resource to be eligible for the NRHP, it must possess integrity of location, design, setting, materials, workmanship, feeling, and association and evaluated as historically significant, further meet one or more of the criteria outline below:. ,

Criteria A (Event). Associated with one or more events that have made a significant contribution to the broad patterns of national, state or local history. Criteria B (Person). Association with the lives of persons significant in the past. Criteria C (Design/Construction). Embodiment of distinctive characteristics of a type, period, or method of construction; or representation of work of a master; or possession of high artistic values; or representation of a significant and distinguishable entity whose components may lack individual distinction. Criteria D (Information Potential). Properties that yield, or are likely to yield, information important in prehistory or history.

Because of their importance to the Nation's heritage, historic properties are protected by multiple laws. Federal agencies, including TVA, have a statutory obligation to facilitate the preservation of historic properties, stemming primarily from NHPA (16 U.S.C. §§ 470 et seq.). Other relevant laws include the Archaeological and Historic Preservation Act (16 U.S.C. §§ 469- 469c), Archaeological Resources Protection Act (16 U.S.C. §§ 470aa-470mm) and the Native American Graves Protection and Repatriation Act (25 U.S.C. §§ 3001- 3013).

Section 106 of the NHPA requires federal agencies to consider the potential effects of their actions on historic properties and to allow the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on the action. Section 106 involves four steps: 1) initiate the process; 2) identify historic properties; 3) assess adverse effects; and 4) resolve adverse effects. This process is conducted in consultation with the State Historic Preservation Officer

(SHPO) of the state in which the action would occur, all federally recognized Tribes with interest in the project location, and with other interested consulting parties. Section 110 of the NHPA sets out the broad historic preservation responsibilities of federal agencies and is intended to ensure that historic preservation is fully integrated into their ongoing programs. Federal agencies are responsible for identifying and protecting historic properties and avoiding unnecessary damage to them. Section 110 also charges each federal agency with the affirmative responsibility for considering projects and programs that further the purposes of the NHPA, and it declares that the costs of preservation activities are eligible project costs in all undertakings conducted or assisted by a federal agency.

Cultural Resource Surveys and Findings

TVA determined the site of potential effects (APE) to be the site of proposed ground-disturbance, where physical effects could occur within the 58.0-acre site as well as sites within a half-mile radius of the project within which the project would be visible, where visual effects on above-ground resources could occur.

A review of the Tennessee Division of Archeology (TDOA) Site File Viewer, and TVA's Cultural Resource Management System (CRMS), indicates a portion of the proposed project footprint has been subjected to multiple cultural resource surveys (Elliot 1993; Hoksbergen & Alexander 2005; Clute & Alexander 2007). TVA's shoreline survey of Chickamauga in the 1990s recorded one site within the current project footprint (Elliot 1993). Site 40RH166 consists of a sparse lithic scatter. In 2005, Alexander Archaeological Consultants (AAC) revisited the site as part of a Phase I survey for a proposed development of sites below the 700-foot contour on Chickamauga Reservoir. The results of the survey determined that site 40RH166 required additional testing in order to determine its NRHP eligibility (Hoksbergen & Alexander 2005). Clute & Alexander conducted Phase II testing on 40RH166 in 2007. Results of the testing concluded that site 40RH166 is a medium density open habitation camp dating to Middle-Late Archaic and Woodland time periods. Clute & Alexander recommended 40RH166 to be ineligible for NRHP inclusion, and no further work is recommended (2007). TVA agrees that no additional testing is required for site 40RH166.

The 2005 Phase I survey also identified sites 40RH284 and 40RH285 within the current proposed project footprint. According to the TDOA site file, sites 40RH284 and 40RH285 are low-density, non-temporally diagnostic precontact artifact scatters heavily deflated because of cultivation-induced erosion. Hoksbergen & Alexander (2005) recommended both sites to be ineligible for NRHP inclusion, and no further work is recommended. TVA agrees that no additional testing is required for sites 40RH284 and 40RH285.

Both TDOA and TVA records indicate approximately 25.0 acres of the proposed project footprint had not been subjected to a systematic cultural resource survey. As such, the applicant retained TRC to conduct a Phase I cultural survey of the remaining 25.0 acres. To allow for design flexibility and provide coverage for future development, the survey site was expanded to 39.0 acres. The survey found no evidence of intact archaeological deposits within the APE. TRC recommended no additional research prior to construction.

TRC recorded two new architectural resources during their survey. A 1968 ranch house (field number HS-1) and a circa 1970 pole barn (field number HS-2) were documented and assessed for inclusion in the NRHP. TRC recommends that newly recorded architectural resources HS-1 and HS-2 are not eligible for inclusion in the NRHP due to their lack of architectural and historical significance. TVA has reviewed TRC's report and agrees with their recommendations.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit for construction activities associated with the proposed development of a new RV campground. As a result, no proposed facilities would be constructed within the project site and there would be no effects on historic properties.

Action Alternative

Under the Proposed Action Alternative, TVA would issue a Section 26a permit for the proposed development of a new RV campground. Construction would involve ground-disturbing activities and the installation of above-ground structures in an uncompromised viewshed. Previous and current Phase I surveys, as well as the previous Phase II survey, did not identify any intact archaeological resources within the APE. Previously recorded archaeological sites 40RH166, 40RH284, and 40RH285 are ineligible for inclusion on the NRHP. As such, the proposed action has no potential to affect archaeological sites. TRC recommends that newly recorded architectural resources, a 1968 ranch house (field number HS-1) and a circa 1970 pole barn (field number HS-2), are not eligible for inclusion in the NRHP due to their lack of architectural and historical significance and that the proposed undertaking would have no effect on historic properties. TVA agrees with TRC's recommendations. Based on the results of the surveys and the lack of NRHP eligible or listed resources in the APE, TVA finds that the proposed undertaking would have no effect on historic properties. TVA is consulting with the TN SHPO and all Federally Recognized Tribes with an interest in the project site over the project findings. On November 3, 2025, TVA consulted with the TN SHPO and all federally recognized Tribes with an interest in the project site regarding TVA's NRHP eligibility determinations and findings of effect. The TN SHPO concurred with TVA's finding of no effect to historic properties on November 3, 2025. TVA received no objections from the consulted Tribes on the proposed undertaking.

Land Use

The proposed project site encompasses approximately 58.0 acres of privately owned land adjacent to Chickamauga Reservoir in Rhea County, Tennessee. The site is currently characterized by a mix of open fields, scattered vegetation, and undeveloped shoreline. Surrounding land uses include low-density rural residential properties, agricultural lands, and public conservation sites, including the adjacent Cottonport WMA managed by the Tennessee Wildlife Resources Agency (TWRA).

The site is not currently developed for intensive recreational or commercial use. A narrow strip of TVA-managed land separates the project site from the shoreline of the reservoir; however, this land is zoned for shoreline access in the 2017 Chickamauga Reservoir Land Management Plan (provide citation). Other planned TVA-managed land in the vicinity of the project site is zoned for natural resource conservation. The majority of the project site lies within the 500-year floodplain, which is subject to TVA's Section 26a jurisdiction.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit for the proposed dock and associated activities on TVA-managed land. As a result, the Waterside RV Park would not be constructed as currently proposed.

In this scenario, the existing land use would remain unchanged. The site would continue to function as undeveloped private land with limited recreational or residential use. TVA-managed shoreline would remain in its current natural state, and no new recreational infrastructure would be introduced. While the No Action Alternative would maintain the status quo, it would also forego the potential recreational and economic benefits associated with the proposed development.

Action Alternative

Under the Action Alternative, TVA would issue a Section 26a permit to Atlas American Properties, LLC for the construction and operation of the Waterside RV Park. This would result in a change in land use from undeveloped, low-intensity rural land to a developed recreational use. The project would introduce a high-density RV campground with associated infrastructure and amenities, including:

- 140 individual RV campsites with utility hookups
- A paved internal road network
- Community facilities such as a clubhouse, pool, restrooms, and recreational courts
- A fixed community dock on TVA-managed shoreline
- An on-site wastewater treatment system and subsurface disposal field

This change would represent a shift in land use intensity and character, increasing human activity and altering the function of the site from passive open space to active recreation. While the development would occur primarily on private land, the proposed dock and shoreline activities would extend onto TVA-managed land, requiring TVA review and approval.

The proposed land use is consistent with regional trends in recreational development along Chickamauga Reservoir and aligns with TVA's mission to support public recreation and economic development, provided that environmental safeguards are in place. However, the proximity to the Cottonport WMA necessitates careful coordination to avoid potential conflicts with conservation and wildlife management objectives.

Wetlands

Wetlands are those sites inundated or saturated by surface or groundwater such that vegetation adapted to saturated soil conditions are prevalent. Examples include bottomland forests, swamps, wet meadows, isolated depressions, and fringe wetland along the edges of watercourses and impoundments. Wetlands provide many societal benefits such as toxin absorption and sediment retention for improved downstream water quality, storm water impediment and attenuation for flood control, shoreline buffering for erosion protection, and provision of fish and wildlife habitat for commercial, recreational, and conservation purposes.

Activities in wetlands are regulated by state and federal agencies to ensure no net loss of wetland resources. Under Section 404 of the CWA , activities resulting in the discharge of dredge or fill material to Waters of the U. S., including wetlands, must be authorized by the USACE through a Nationwide, Regional, or Individual Permit to ensure no more than minimal impacts to the aquatic environment. Section 401 of the CWA requires state water quality certification for projects in need of federal approval. In Tennessee, the Tennessee Department of Environment and Conservation (TDEC) is responsible for issuance of water quality certifications pursuant to Section 401 of the Federal Water Pollution Control Act (33

U.S.C. 1251, 1341) regarding regulated waters of the State. Lastly, Executive Order 11990 requires federal agencies to avoid construction in wetlands and minimize wetland degradation to the extent practicable.

Wetland assessments were performed to ascertain wetland presence. A field survey was conducted on November 8, 2024, by UES Professional Solutions 19 for the Waterside RV Park property, to identify wetland resources. Wetland determinations were performed according to the USACE standards, which require documentation of hydrophytic (wet-site) vegetation, hydric soil, and wetland hydrology (Environmental Laboratory 1987; USACE 2024; USACE 2012). The USACE defines vegetative cover stratums as:

- Trees/Forest: Woody plants, excluding woody vines, approximately 20 feet or more in height and 3 inches or larger in diameter at breast height.
- Scrub/Shrub: Woody plants, excluding woody vines, approximately 3 to 20 feet in height.
- Herb/Emergent: All herbaceous (non-woody) plants, including herbaceous vines, regardless of size, and woody plants, except woody vines, less than approximately 3 feet in height.

Table 1. Wetlands located within proposed Waterside RV Park 26a Project Site

Wetland Identifier	Wetland Type[1]	Wetland Acreage within the Project Site	Wetland HUC10	Wetland HUC Name
WA	PEM	0.14	0602000106	Tennessee River
WB	PEM	0.08	0602000106	Tennessee River
WC	PEM	0.09	0602000106	Tennessee River
Total Acres		**0.31**		

[1]*Classification codes as defined in Cowardin et al. (1979): P=Palustrine; EM=Emergent*

The property for the proposed project is 58.0 acres and located in a rural landscape, dominated by agricultural fields and forested uplands and bottomlands, and intermixed with some residential properties. The project is located within the Tennessee River watershed (10-digit HUC 0602000106). The project site for the Action Alternative was surveyed to identify actual wetland extent. Three wetlands, totaling 0.31 acres, were identified within the proposed project site (Table-1). The combination of land-use practices and landscape position dictates the wetland habitat type, wetland functional capacity, and wetland value. The identified wetlands consisted entirely of emergent habitat type (Table-2).

Table 2. Acreage of wetlands by habitat type within the action alternative site and relative to total mapped wetland occurrence within the watershed.

Watershed (10-HUC)	NWI Estimated Total Wetland Acres in Watershed	Delineated Total Wetland Acreage in Proposed Project Site			
		Emergent	Scrub-Shrub	Forested	TOTAL
Tennessee River (0602000106)	**1,216.74**	0.31	NA	NA	**0.31**

Emergent wetlands within the project totaled 0.31 acres across three delineated wetlands. Emergent wetlands consist of predominantly non-woody vegetation across sites periodically saturated and/or inundated. Emergent wetlands in this general vicinity are found where land-use practices or inundation deter growth of woody species. Emergent wetland habitats encountered within the proposed project included a low site connected to an ephemeral channel (WA) and two linear wetlands derived from old agricultural ditches (WB and WC). The emergent wetland habitats contained indicators of wetland hydrology, which influence the soil such that coloration indicative of wetland conditions was evident in the soil profile. Emergent wetlands were dominated by common emergent wetland vegetation including Pennsylvania smartweed (*Polygonum pensylvanicum*), ironweed (*Veronia fasciculata*), clustered fescue (*Festuca paradoxa*), fox sedge (*Carex vulpinoidea*), yellow foxtail (*Setaria pumila*), and American marsh-pennywort (*Hydrocotyle americana*). Scrub-shrub and forested wetlands, which contain woody vegetation, were not observed within the proposed project property.

No Action Alternative

Under the No Action Alternative, TVA would not issue Section 26a approval for construction activities associated with the proposed Waterside RV Park development. On-site wetlands would remain in their current condition. There would be no impact to wetlands located within the project site.

Action Alternative

Under the Action Alternative, TVA would grant Section 26a approval for the proposed construction activities associated with Waterside RV Park. The proposed development would be designed to avoid or minimize wetland impacts to the extent practicable, in accordance with federal and state wetland mandates.

This alternative would include placement of fill in approximately 0.165 acres of low quality; emergent wetland associated with wetlands WB and WC. The entirety of wetland WA (0.14 acres) would be avoided. Impacts would occur on 0.029 acres of wetland WB (out of 0.08 acres) for a road crossing and 0.136 acres of wetland WC (out of 0.09 acres) for a road crossing and a future pond (Table 3). The applicant is responsible for remaining in compliance with state and federal regulations regarding CWA Sections 404 and 401 pertaining to wetland impacts. Permits and compensatory mitigation necessary to remain in

compliance with CWA Sections 404 and 401 could be required by USACE and TDEC, respectively, to ensure insignificant impacts to wetlands result from the proposed project. With applicable permit and mitigation compliance, avoidance, and minimization, TVA's Section 26a approval would have no significant impacts to wetlands within the larger watershed basin and TVA would remain compliant with EO 11990.

Table 3. Impacts to Wetlands Within the Proposed Project Site

Wetland Identifier	Impact Type	Temporary Impacts for Access	Acreage of Wetland Fill	Acreage of Wetland Dredge
WA	None	--	--	--
WB	Culvert for road crossing	--	0.029	--
WC	Culvert for road crossing; pond construction	--	0.136	--
WD	None	--	-	--
TOTAL ACRES			**0.165 Acres**	

The applicant has already obtained and will comply with a TDEC General Aquatic Resource Alteration Permit (GARAP) for 0.194 acres of wetland fill (ARAP No. NR2501.014). Additionally, the applicant would apply for a Section 404 Permit from USACE following the issuance of the Section 26a permit.

Floodplains

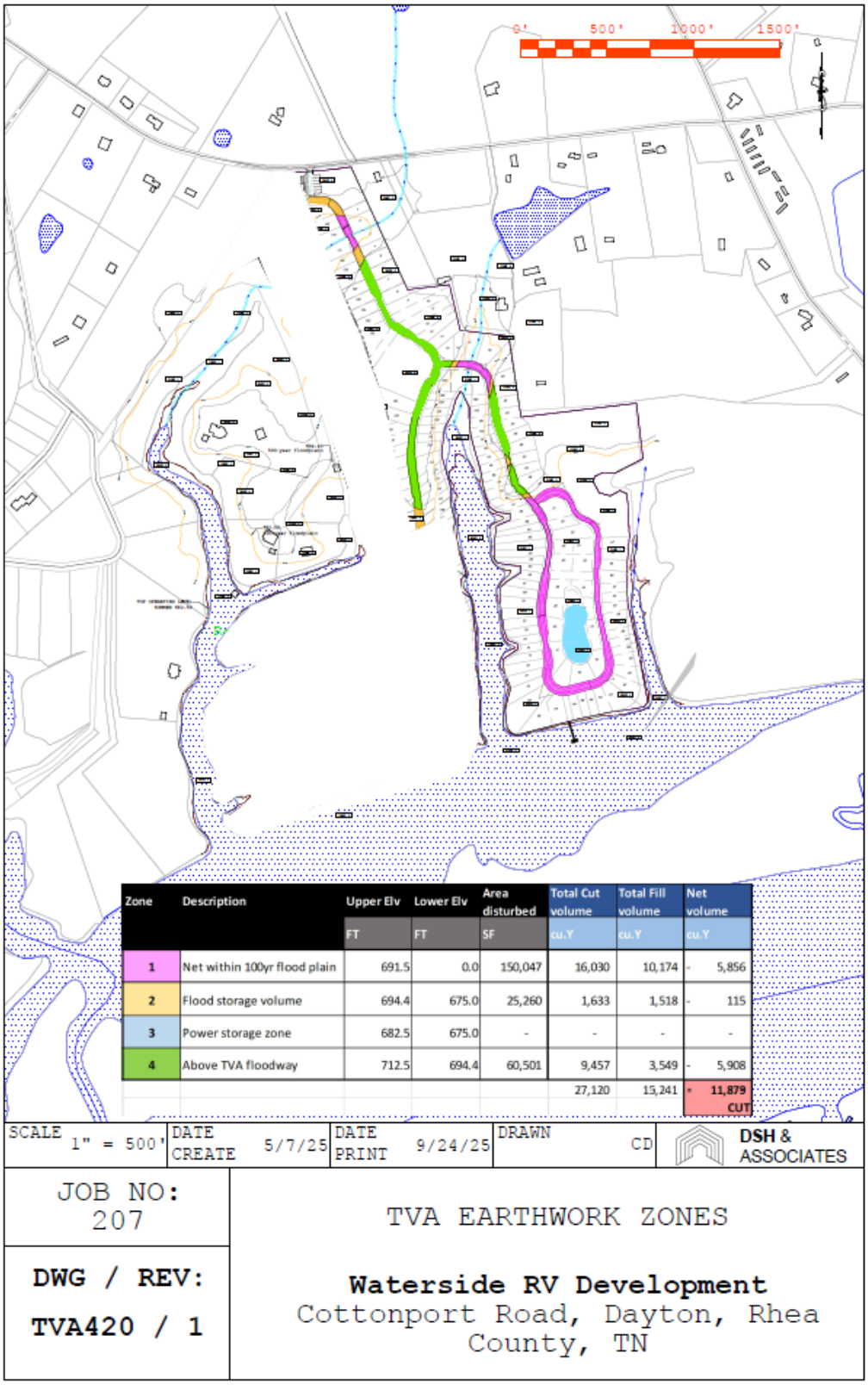
A floodplain is the relatively level land site along a stream or river that is subject to periodic flooding. The site subject to a one-percent chance of flooding in any given year is normally called the 100-year floodplain. The site subject to a 0.2-percent chance of flooding in any given year is normally called the 500-year floodplain. It is necessary to evaluate development in the floodplain to ensure that the project is consistent with the requirements of Executive Order (EO) 11988, Floodplain Management.

The proposed project would be located at about Tennessee River Mile 512.4, right descending bank, on Chickamauga Reservoir, in Rhea County, Tennessee. At this location, the 100-year flood and TVA flood risk profile elevations would be 691.5 and 694.4 feet, respectively. In alignment with TVA's standard for flood-damageable development on TVA lands around TVA reservoirs, the floor elevation for flood-damageable development would be at or above 696.4.

TVA reservoirs have either power storage or flood storage or both. Power Storage is allocated to a range of elevations called the Power Storage Zone (PSZ) and water occupying space in that zone is used to generate electric power through a dam's hydroturbines. Flood Storage is allocated to a range of elevations called the Flood Storage Zone (FSZ) and water occupying space within that zone is used to store flood water during a flood or high-flow event. The PSZ would extend from elevations 675.0 to 682.5, and the FSZ would extend from elevations 675.0 to 694.4.

Some of TVA's dams are also able to be surcharged. Surcharge is the ability to raise the water level behind the dam above the top-of-gates elevation. Surcharge can be sustained only for a short period of time during a flood when inflows are highest. To control flood-damageable development on TVA lands, TVA uses a concept known as the Flood Risk Profile (FRP). The FRP is the elevation of the 500-year flood that has been adjusted for surcharge at the dam. At this location on Chickamauga Reservoir, the FRP elevation is equal to the 500-year flood elevation.

As a federal agency, TVA adheres to the requirements of EO 11988, Floodplain Management. The objective of EO 11988 is "…to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative" (EO 11988, Floodplain Management). The EO is not intended to prohibit floodplain development in all cases, but rather to create a consistent government policy against such development under most circumstances (U.S. Water Resources Council, 1978). The EO requires that agencies avoid the 100-year floodplain unless there is no practicable alternative. See Figure 3 for earthwork zones in and out of the floodplains.



Zone	Description	Upper Elv	Lower Elv	Area disturbed	Total Cut volume	Total Fill volume	Net volume
		FT	FT	SF	cu.Y	cu.Y	cu.Y
1	Net within 100yr flood plain	691.5	0.0	150,047	16,030	10,174	- 5,856
2	Flood storage volume	694.4	675.0	25,260	1,633	1,518	- 115
3	Power storage zone	682.5	675.0	-	-	-	-
4	Above TVA floodway	712.5	694.4	60,501	9,457	3,549	- 5,908
					27,120	15,241	* 11,879 CUT

Figure 3. Earthwork Zones

No Action Alternative

Under the No Action Alternative, TVA would not approve the proposed Waterside RV Park project. As a result, no construction or development would occur at the project site. The natural and existing conditions of the floodplain would remain unchanged.

Action Alternative

Under the Action Alternative, TVA would approve the Section 26a permit for the proposed Waterside RV Park. A swimming pool, sports court, dog park, playground, pavilion with community kitchen and bar, change rooms, bathrooms, laundry, and office inside, a wastewater treatment plant and disposal field, and RV storage would be located outside the 500-year floodplain, which would be consistent with EO 11988 and the TVA Flood Storage Loss Guideline.

RV park roads, including culverts and ditches, driveways, excavation with a net cut in the PSZ and FSZ and a net cut of over seven acre-feet within the 100-year floodplain with the resulting creation of two ponds and drainage swales, gravel walkway, a fixed community dock, open covered pavilions with grills and fireplaces, landscaping, picnic tables, electric power, including transformers, water, buried septic tanks, and sanitary hookups would be located partially or completely within the 100-year floodplain. Consistent with EO 11988 and TVA's 1981 Class Review of Repetitive Actions in the 100-Year Floodplain, these facilities are considered repetitive actions that should result in only minor impacts (TVA 1981). Floodplain mitigation measures 1 through 5 would minimize adverse impacts for these facilities.

Many of the RV sites would be located within the 100-year floodplain and below the 100-year flood elevation 691.5. To be consistent with the minimum standards of the National Flood Insurance Program (NFIP) at 40 CFR 60.3, the applicant would require RVs to be on the site for fewer than 180 consecutive days and be fully licensed and ready for highway use. A recreational vehicle is ready for highway use if it is on its wheels or jacking system, is attached to the site only by quick disconnect type utilities and security devices and has no permanently attached additions. Additionally, at 40 CFR 59.1, a recreational vehicle is defined as follows: built on a single chassis; 400 square feet or less when measured at the largest horizontal projection; designed to be self-propelled or permanently towable by a light duty truck; and designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use. By adhering to the NFIP regulations for recreational vehicles, the RVs would not be considered habitable structures. Floodplain mitigation measures 6 through 16 would minimize adverse impacts at individual RV sites. Therefore, the RV sites would be consistent with EO 11988.

Although the RV park is approvable under Section 26a, TVA retains the right to flood the property to elevation 698, which exceeds both the 100-year flood elevation of 691.5 and 500-year flood elevation of 694.4. To further minimize adverse impacts, site owners would be made aware of the mitigation measures for them.

The proposed RV park would comply with the TVA Flood Storage Loss Guideline because there would be less than 1.0 acre-foot of lost flood storage.

By incorporating the identified mitigation measures, the proposed Waterside RV Park would avoid significant adverse impacts to the floodplain and its natural and beneficial values. Site

owners would be informed of TVA's retained right to flood the property to elevation 698 feet and of the mitigation measures applicable to their use of the site.

Terrestrial Ecology (Plants)

The proposed project would occur in the Southern Limestone/Dolomite Valleys and Low Rolling Hills Level IV ecoregion (Griffith et al. 1998). This region is composed predominantly of limestone and cherty dolomite, and landforms are low rolling ridges and valleys. Landcover is mostly agriculture, urban and industrial, or sites of thick forest. Common forest types include white oak forests, bottomland oak forests, and sycamore-ash-elm riparian forests. Grassland barrens intermixed with cedar-pine glades also occur here.

A field survey was conducted in July of 2025 to document plant communities, infestations of invasive plants, and to search for possible threatened and endangered plant species in sites where work would occur. Using the National Vegetation Classification System (Grossman et al. 1998), vegetation types observed during field surveys can be classified as a combination of deciduous forest and herbaceous vegetation. No forested sites in the proposed project site have structural characteristics indicative of old growth forest stands (Leverett 1996). The plant communities observed on-site are common and well represented throughout the region. Vegetation in the proposed project site is characterized by two main types: forest (8 percent) and herbaceous (92 percent).

Herbaceous vegetation is characterized by greater than 75 percent cover of forbs and grasses and less than 25 percent cover of other types of vegetation. The majority of this habitat consists of open fields comprised of native and non-native species such as dogfennel, horseweed, common ragweed, American pokeweed, Carolina horse-nettle, Johnson grass, white clover, multiflora rose, beefsteak plant, curly dock, and dallis grass.
Deciduous forest, which is characterized by trees with overlapping crowns where deciduous species account for more than 75 percent of the canopy cover, occurs on approximately 8 percent of the vegetated project site. Common overstory species include sweetgum, willow oak, white oak, and Virginia pine. The diameter at breast height of the overstory species ranges from 8 to 20 inches. The midstory is dominated by Chinese privet, winged elm, eastern red maple, Callery pear, and eastern red cedar. The herbaceous layer in these sites includes Chinese bushclover, Japanese stiltgrass, lizard's tail, common greenbriar, eastern poison ivy, and wild potato vine.

Executive Order (EO) 13112 directs TVA and other federal agencies to prevent the introduction of invasive species (both plants and animals), control their populations, restore invaded ecosystems, and take other related actions. EO 13751 amends EO 13112 and directs actions by federal agencies to continue coordinated federal prevention and control efforts related to invasive species. This order incorporates considerations of human and environmental health, climate change, technological innovation, and other emerging priorities into federal efforts to address invasive species. Some invasive plants have been introduced accidentally, but most were brought here as ornamentals or for livestock forage. Because these robust plants arrived without their natural predators (insects and diseases), their populations spread quickly across the landscape, displacing native species and degrading ecological communities and ecosystem processes (Miller et al. 2010). Large portions of the Waterside RV Park site were extensively altered in the past, resulting in the introduction and spread of invasive non-native plants. During the July 2025 field survey, many non-native invasive plant species were observed throughout the study site, including Chinese privet, Chinese bushclover, Japanese stiltgrass, Johnson grass, white clover, curly dock, and Callery pear. All these species occur widely across the landscape and have the

potential to adversely impact the native plant communities because of their ability to spread rapidly and displace native vegetation.

Threatened and Endangered Species (Terrestrial Plants)

A review of the TVA Natural Heritage database indicates that one state and no federally listed plant species have been previously reported within five miles of the project site (Table 4). Three federally listed plant species have been previously reported from Rhea County, Tennessee (Table 4), where the project resides. No state or federally listed plants were observed in the proposed project site and no designated critical habitat for plants occurs in the project site.

Table 4. Species of Conservation Concern Known From within Five Miles of the Project Site and Federally listed Species in Rhea County, Tennessee[1]

Scientific Name	Common Name	Federal Status[2]	TN State Status[2]	TN State Rank[3]
Asplenium scolopendrium var. *americanum* [4]	American hart's-togue fern	LT	LE	S1
Clematis morefieldii [4]	Morefield's leather flower	LE	LE	S2
Isotria medeoloides [4]	Small whorled pogonia	LT	LE	S1
Oligoneuron album	Prairie goldenrod	-	LE	S1S2

[1]Source: TVA Regional Natural Heritage Database and USFWS Ecological Conservation Online System (http://ecos.fws.gov/ecos/home.action) extracted on September 5, 2025.

[2]Status: LE = Listed Endangered; LT = Listed Threatened

[3]State Ranks: S1 - Extremely rare and critically imperiled in the state with 5 or fewer occurrences, or very few remaining individuals, or because of some special condition where the species is particularly vulnerable to extirpation; S2 - Very rare and imperiled within the state, 6 to 20 occurrences; S#S# - Denotes a range of ranks because the exact rarity of the element is uncertain (e g...S1S2).

[4]Federally listed species occurring within Rhea County where work would occur, but not necessarily within 5 miles of the project site.

No Action Alternative

Under the No Action Alternative, the project site would remain in its current condition. Thus, adoption of the No Action Alternative would not affect plant life in the proposed project site because no project-related work would occur. Changes to local plant communities resulting from natural ecological processes and human-related disturbance would continue to occur, but the changes would not result from the proposed project. All invasive species found in the project site are common throughout the region and implementation of the No Action Alternative would not change this situation.

Adoption of the No Action Alternative would not impact federally listed plants, designated critical habitat, or state-listed plants species because no project-related work would occur. No federally or state-listed plants or designated critical habitat occurs within the project site. Changes to local plant communities resulting from natural ecological processes and human-related disturbance would continue to occur. These changes may benefit or negatively affect the plants present in the proposed project site, but the changes would be unrelated to the proposed project.

Action Alternative

Adoption of the Action Alternative would not significantly affect the terrestrial ecology of the region. The majority of herbaceous vegetation at the site is heavily disturbed by previous land use, dominated by non-native plant species, and possesses little conservation value. The forested sites have a large component of invasive species and removal of these common forested communities would not impact the terrestrial plant ecology of the region. The majority of the project site currently has a substantial component of invasive terrestrial plants and adoption of the Action Alternative would not significantly affect the extent or abundance of these species at the county, regional, or state level.

Adoption of the Action alternative would not affect federally listed plant species, designated critical habitat for plants, or state-listed plant species because they do not occur in the proposed project site. Previous activities on the proposed project site have resulted in significant disturbance that makes the parcel incapable of supporting threatened or endangered plant species. Adoption of this alternative would result in additional disturbance on the site, but the action would not affect federal or state-listed plants as those species are not present.

Terrestrial Ecology (Wildlife)

The proposed project is an RV Park development that would cover 58.0 acres and include various infrastructure components to support recreation. The project site is composed primarily of overgrown agriculture fields with narrow, linear strips of forested habitat comprised of mixed hardwoods and pines. An old barn exists on the property which would be removed as part of the project actions. Features surrounding the project site consist of pasture, cropland, and developed residential sites. A field survey of the project site was conducted in July 2025, by TVA Terrestrial Zoologists.

Early-successional, herbaceous habitat (i.e., field and scrub-shrub) comprises the majority of the project site. Common avian inhabitants of early-successional habitat include American crow, American robin, brown-headed cowbird, common grackle, eastern bluebird, northern cardinal, and red-tailed hawk, among others (National Geographic 2002). Mammalian species likely present in this habitat include eastern cottontail, hispid cotton rat, red fox, striped skunk, and white-tailed deer (Whitaker 1996). Common amphibian and reptile species of this habitat include Fowler's toad, upland chorus frog, and North American racer (Powell et al. 2016). Where this habitat is bordered by forest, a more diverse array of common wildlife species are likely to be found using edge habitat.

Approximately 7.3 acres of the project are forested. Forested habitat within the project site is composed of mixed deciduous forest with scattered pine stands. Deciduous tree species provide habitat for common birds such as Carolina chickadee, Carolina wren, chipping sparrow, common yellowthroat, downy woodpecker, eastern towhee, northern mockingbird, tufted titmouse, and white-throated sparrow (National Geographic 2002). Mammals found in these habitats include common raccoon, eastern gray squirrel, white-tailed deer, and Virginia opossum (Whitaker 1996). Common amphibian and reptile species likely found in this habitat include American toad, eastern box turtle, eastern copperhead and eastern garter snake (Powell et al. 2016).

During field surveys in July 2025, red imported fire ants were observed within the project site. Imported fire ants have an impact on agriculture and natural resources by damaging crops, agricultural equipment, and impacting wildlife. The United States Department of Agriculture's

(USDA) Animal and Plant Health Inspection Service (APHIS) works to prevent the artificial (human) spread of this pest by enforcing the Federal Quarantine and works with state cooperators to regulate high-risk commodities, such as nursery stock, hay, and soil-moving equipment. Rhea County, Tennessee, is currently under APHIS quarantine. As such, any soil, baled hay or straw, plants and sod with roots and soil attached, soil-moving equipment, or other "Regulated Articles" as defined by USDA should be in compliance with APHIS Quarantine Regulations (USDA APHIS 2024) and Tennessee Department of Agriculture rules (TDOA 2007).

No Action Alternative

Under the No Action Alternative, TVA would deny the applicant's request for a Section 26a permit for the proposed RV campground and associated facilities. As a result, the new commercial RV development would not be constructed on Chickamauga Reservoir. Any activities occurring solely on private land would not be subject to TVA approval unless they fall within sites regulated by TVA, such as the 100-year or 500-year floodplain. Therefore, no resources would be impacted by the proposed action. Wildlife habitats would remain in their current state and no direct or indirect impacts on wildlife, wildlife habitat, or threatened and endangered species would occur under the No Action Alternative.

Action Alternative

The Action Alternative could result in the displacement of wildlife (primarily common, habituated species) currently using the site. Direct effects to some individuals could occur if those individuals are immobile during the time of habitat removal (e.g., during breeding, nesting or hibernation seasons). Habitat removal may disperse mobile wildlife into surrounding sites in attempts to find new food sources, shelter, and to reestablish territories. Due to the extent of previous disturbance and the availability of similarly suitable habitat in sites throughout the surrounding landscape, impacts to populations of common wildlife species as a result of the Action Alternative are expected to be minor.

Suitable nesting habitat for black-billed cuckoo, Canada warbler, chuck-will's-widow, eastern whip-poor-will, Kentucky warbler, prairie warbler and wood thrush is available in the forested sections of the project site. The Action Alternative may destroy nests, eggs, or juveniles of these species if Proposed Actions occur within the project site while nests are active. Never-the-less, given the abundance of similar or superior habitat surrounding the project footprint, impacts to populations of these migratory birds of conservation concern as a result of the Action Alternative would be minor

Threatened and Endangered Species (Terrestrial Animals)

A review of terrestrial animal species in the TVA Regional Natural Heritage Database (NHD) on May 2, 2025, resulted in two federally listed species (gray bat and northern long-eared bat), two species of state conservation concern (osprey and Norton's cave beetle), and one species proposed for federal listing (tricolored bat) within three miles of the project site. The United States Fish and Wildlife Services' (USFWS) IPaC tool determined two additional federally listed species (Indiana bat and whooping crane) and one species proposed for federal listing (monarch butterfly) have the potential to occur in the project site (Table 5). Habitat suitability and potential impacts to these species are addressed below.

Table 5. Federally Listed or Protected Terrestrial Animal Species Reported from Rhea County, Tennessee and Other Species of Conservation Concern Documented within Three Miles of Proposed Waterside RV Development [1]

Scientific Name	Common Name	Federal Status[2]	TN State Status[2]	TN State Rank[3]
Birds				
Haliaeetus leucocephalus	Bald eagle	DM	-	-
Pandion haliaetus	Osprey	-	-	S3
Grus americana[4]	Whooping crane	EXPN, XN	-	SX
Invertebrates				
Danaus plexippus[4,5]	Monarch butterfly	PT	-	S4
Pseudanophthalmus nortoni	Norton's cave beetle	-	R	SH
Mammals				
Myotis grisescens	Gray bat	LE	LE	S2
Myotis sodalis[4]	Indiana bat	LE	LE	S1
Myotis septentrionalis	Northern long-eared bat	LE	LE	S1S2
Perimyotis subflavus	Tricolored bat	PE	LT	S2S3

[1]Source: TVA Regional Natural Heritage Database and USFWS Ecological Conservation Online System (http://ecos.fws.gov/ecos/home.action) extracted September 9, 2025
[2]Status: DM = Delisted and Being Monitored; E or LE = Endangered; EXPN, XN = Experimental Population, Non-Essential PE = Proposed Endangered; PT = Proposed Threatened; R = Rare, Not State Listed; T or LT = Threatened;
[3]Rank: S1 = Extremely rare and critically imperiled; S2 = Very rare and imperiled; S3 = Rare and uncommon; S4 = Widespread and abundant but with cause for long-term concern; SH = Historical (possibly extirpated); SX = Presumed extirpated; S#S# - Denotes a range of ranks because the exact rarity of the element is uncertain.
[4]Federally listed or protected species that have not been documented within three miles of Project Site or within Rhea County, Tennessee; USFWS has determined this species has potential to occur within Project Site.
[5]Species proposed for listing under the Endangered Species Act. Historically this species has not been tracked by state or federal heritage programs.

Bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). This species is associated with large mature trees capable of supporting their nests, which can weigh several hundred pounds and are typically built near larger waterways where they forage primarily for fish (USFWS 2007). One bald eagle nest record occurs within three miles of the project site, approximately 1.34 miles away. Osprey are medium-sized raptors that are typically associated with water, where they forage exclusively for fish. Osprey build nests in trees or man-made structures (e.g., transmission structures) near or over water (Bierregaard et al. 2020). One osprey nest record is known within three miles of the project site, approximately 2.15 miles away. No osprey or eagle nests were observed during field review of the project site in July 2025. Suitable foraging and nesting habitat for bald eagle and osprey is present throughout forested portions of the project site.

Whooping cranes migrate through Tennessee twice per year in small flocks of three to five birds. During migration, they stop to feed and rest in wetland complexes, marshes, ponds, lakes, rivers, and agricultural fields (USFWS 2023b). The whooping crane is listed as Endangered in the Southwest (USFWS Region 2). Outside of this region, whooping crane is categorized as a non-essential experimental population. For the purposes of regulatory consultation under ESA, non-essential experimental populations are treated as threatened species on National Wildlife Refuge and National Park land (requiring consultation under 7(a)(2) of the ESA) and as a proposed species on private land (no section 7(a)(2) requirements, but Federal agencies must not jeopardize their existence (section 7(a)(4))) (USFWS 2023a). Whooping cranes are known to occasionally visit the Hiawassee Wildlife Refuge during migration. This refuge is located approximately five miles from the project site. Migratory stopover habitat does not exist within the site, and no records of whooping crane are known from the site.

Monarch butterfly is a highly migratory species, with eastern United States (U.S.) populations overwintering in Mexico. Monarch populations typically return to the eastern U.S. in April (Davis and Howard 2005). Summer breeding habitat requires milkweed plant species, on which adults exclusively lay eggs and where larvae develop and feed. Adults will drink nectar from other blooming wildflowers when milkweeds are not in bloom (Schweitzer and Jepsen 2014). Some flowering plants were observed within early-successional habitats in the project site; however, no milkweeds were observed during field surveys in July 2025. Due to prolonged agricultural use of this site, no significant quantities of flowering plants are expected to occur in the project site. Though this species has not been historically tracked by state or federal heritage programs, the USFWS IPaC tool indicated that this species could occur within the project site.

Norton's cave beetle is a cave-obligate species in the *Pseudanophthalmus* genus, which are blind, predatory cave beetles, that feed on invertebrates in moist cave microclimates (Barr 1962). The closest cave record occurs 2.05 miles from the project site, while the closest Norton's cave beetle record occurs 2.11 miles from the project site. Due to the lack of caves in the project site, suitable habitat for Norton's cave beetle is not available.

Gray bats roost in caves year-round and migrate between summer and winter roosts during spring and fall (Brady et al. 1982, Tuttle 1976). Gray bats have also been documented roosting in manmade structures, such as on bridges and in abandoned buildings. Summer caves are typically located close to rivers or lakes. Bats disperse over bodies of water at dusk, where they forage for insects emerging from the surface of the water (Harvey et al. 2011, USFWS 1982). The closest known gray bat record is from a mist-net capture approximately 2.01 miles from the project site. There are four known caves within three miles of the project site, with the closest occurring approximately 2.05 miles away. Aquatic foraging habitat for this species exists in the project site over Chickamauga Reservoir.

Indiana bats hibernate in caves in winter and use sites around those caves in fall and spring (for swarming and staging), prior to migration back to summer habitat. During summer, Indiana bats roost under the exfoliating bark of dead and living trees (typically ≥5 inches in diameter at breast height (DBH)) in mature forests with an open understory, often near sources of water. Indiana bats are known to change roost trees frequently throughout the season, yet still maintain site fidelity, returning to the same summer roosting sites in subsequent years. This species forages over forest canopies, along forest edges and tree lines, and occasionally over bodies of water (USFWS 2007a; USFWS 2024). While the

USFWS has determined Indiana bat has the potential to occur within the action site, no known records of Indiana bat have been documented from Rhea County, Tennessee. Similarly, northern long-eared bat predominantly overwinters in large hibernacula such as caves, abandoned mines, and cave-like structures. During fall and spring, they utilize entrances of caves and surrounding forested sites for swarming and staging. In summer, northern long-eared bats roost individually or in colonies beneath exfoliating bark or in crevices of both live and dead trees (typically ≥3 inches DBH). This species also roosts in abandoned buildings and under bridges. Northern long-eared bats emerge at dusk to forage below the canopy of mature forests on hillsides and roads, and occasionally over forest clearings and along riparian sites (USFWS 2024). The closest known northern long-eared bat record was documented approximately 2.01 miles from the project site.

Foraging habitat for these species exists in the project site over Chickamauga Reservoir, and over and around forested habitat. Suitable summer roosting habitat is present within the forested acreage of the project site.

Tricolored bats are proposed for federal listing and are generally solitary or found in small groups. The closest known tricolored bat record was from a harp-net capture at a cave approximately 2.19 miles from the project site. This species is associated with forested landscapes where they forage near trees and along waterways, especially in riparian sites. Summer roosts are primarily in live and dead leaf clusters of live or recently dead deciduous hardwood trees, Spanish moss, and beard lichen. However, this species has also been documented roosting in artificial structures such as bridges and culverts, and occasionally in barns during summer months. In winter, this species is most commonly found in caves and mines but may also use culverts, abandoned wells, tree cavities and rock shelters (USFWS 2021). Forested sites were deemed low to moderately suitable for tricolored bat summer roosting habitat due to the dense understory with some suitable trees rising above the clutter. Foraging habitat for this species exists over Chickamauga Reservoir and around trees within the project site.

Following the 2024 Range-Wide Indiana Bat Survey Guidelines (USFWS 2024), TVA surveyed the project footprint for the presence of potentially suitable habitat for federally listed bats in July 2025. Tree removal in the project site would exclude trees larger than three inches diameter at breast height (DBH). Suitable foraging habitat was identified within the project site for gray bat, Indiana bat, northern long-eared bat and tricolored bat in and around forests, forested edges, and over Chickamauga Reservoir.

Review of the TVA Regional NHD resulted in four cave records within three miles of the project site boundary, the nearest of which occurs approximately 2.05 miles away. No caves were observed during the July 2025 field survey conducted by TVA Terrestrial Zoologists. No other unique or important terrestrial habitat exists in the project site. Due to the distance between the project site and documented caves, no known caves would be impacted by the Proposed Action.

Additionally, the TVA Regional NHD query resulted in records of five wading bird colonies within three miles of the project site, the nearest of which was documented approximately 0.75 miles away. Known wading bird colonies would not be affected by the proposed activities. Further review of the USFWS' Information for Planning and Consultation (IPaC) tool identified 13 migratory bird species of conservation concern with potential to occur in the project site: bald eagle, black-billed cuckoo, Canada warbler, cerulean warbler, chimney swift, chuck-will's-widow, eastern whip-poor-will, Kentucky warbler, prairie warbler,

prothonotary warbler, red-headed woodpecker, rusty blackbird, and wood thrush (USFWS 2023). See the Threatened and Endangered Species section for a discussion of potential impacts to bald eagles. See Appendix B for a full description of migratory bird habitat.

The project does not fall within the breeding range of rusty blackbird. Therefore, if present during Project actions, these species would be expected to be mobile and to flush if disturbed. Suitable nesting habitat does not exist within the project site for cerulean warbler, chimney swift, prothonotary warbler, eastern whip-poor-will, or red-headed woodpecker. Neither the Action Alternative nor the No Action Alternative would result in impacts to populations of these migratory birds of conservation concern. Suitable nesting habitat for black-billed cuckoo, Canada warbler, chuck-will's-widow, Kentucky warbler, prairie warbler and wood thrush is available in the forested sections of the project site.

No Action Alternative

Under the No Action Alternative, TVA would deny the applicant's request for a Section 26a permit for the proposed RV campground and associated facilities. As a result, the new commercial RV development would not be constructed on Chickamauga Reservoir. Any activities occurring solely on private land would not be subject to TVA approval unless they fall within sites regulated by TVA, such as the 100-year or 500-year floodplain. Therefore, no resources would be impacted by the proposed action. Threatened and Endangered species habitats would remain in their current state and no direct or indirect impacts on wildlife, wildlife habitat, or threatened and endangered species would occur under the No Action Alternative.

Action Alternative

Under the Action Alternative, TVA would issue a Section 26a permit for the construction and operation of a new RV campground on Chickamauga Reservoir in Rhea County, Tennessee. The following sections discuss potential impacts for terrestrial wildlife and terrestrial threatened and endangered species.

Based on a review of the TVA Regional NHD and field surveys performed in July 2025, no suitable habitat exists in the project site for whooping crane or Norton's cave beetle. The Action Alternative would not jeopardize the continued existence of whooping crane and would have no effect on populations of Norton's cave beetle.

Increased turbidity and silt in the Tennessee River may impact bald eagle and osprey foraging habitat. BMPs would be implemented to minimize potential impacts to bald eagle and osprey foraging habitat to the extent practicable. Given the distance of known nesting records from the project site, and with the implementation of BMPs, impacts to bald eagle and osprey foraging and nesting habitat would be expected to be minor as a result of the Action Alternative. The Action Alternative is in compliance with National Bald Eagle Management Guidelines.
Vegetation removal and grading across the Project Site could impact monarch butterfly foraging habitat. However, no milkweed plants were observed within the Project Site during field review in July 2025, as such, breeding habitat for this species would not be impacted. The Action Alternative would not jeopardize the continued existence of monarch butterfly.

No caves or other hibernacula for gray bat, Indiana bat, northern long-eared bat or tricolored bat have been documented within the Project Site, and none were observed during field surveys. All caves exist 2.05 miles or farther from Project Actions. Caves and karst habitat

would not be affected by the Action Alternative. One building is proposed for demolition as part of Proposed Actions. This building was reviewed during the field survey and found to be unsuitable for roosting bat species. Trees less than three inches DBH would be removed for this project. Trees three inches DBH or greater would not be removed, thus suitable summer bat roosting habitat would not be disturbed. BMPs would be implemented to minimize impacts to water quality to the extent practicable.

A number of activities associated with the Action Alternative were addressed in TVA's programmatic consultation with the U.S. Fish and Wildlife Service on routine actions for federally listed bats in accordance with Endangered Species Act Section 7(a)(2), completed in April 2018 and revised in 2023 and 2024. For those activities with potential to affect bats, TVA committed to implement specific conservation measures. These activities and associated conservation measures are detailed in the TVA Bat Strategy Project Screening Form (Appendix B) and must be reviewed and implemented as part of the proposed project. Given the implementation of these conservation measures, proposed actions would not significantly impact gray bat, northern long-eared bat or Indiana bat. In addition, proposed actions would not jeopardize the continued existence of the tricolored bat. The Action Alternative would not result in significant impacts to any terrestrial species or their habitats.

Aquatic Ecology

The proposed Waterside RV Park project site is located in Rhea County, Tennessee, and falls within the Tennessee River (0602000106) HUC-10 watershed, in the Southern Limestone/Dolomite Valleys and Low Rolling Hills sub-ecoregion of the Ridge and Valley ecoregion (Griffith et al. 2009). During a November 2024 field survey, certified hydrologic professionals for UES Professional Solutions 19, LLC completed a water resource assessment. Field crews documented two watercourses, one perennial stream (Crooked Branch) and one ephemeral stream (Appendix X).

Crooked Branch is a small tributary to the Mainstem Tennessee River in Rhea County, TN. No fish were observed during the field survey, but the tributary was evaluated as a perennial stream due to a secondary indicator score of 21 on the TDEC HD form. Due to the high gradient of the two channels observed within the project site, they would not provide suitable habitat for a rich aquatic community.

A query of the TVA Natural Heritage Database and the U.S. Fish and Wildlife Service's Information for Planning and Consultation (IPaC) indicated nine federally listed species (two fish and seven freshwater mussels) and an additional two state-listed species as occurring within the potentially affected 10-digit HUC watershed adjacent to the proposed project site (Aquatics Table 1). One additional species, Tennessee Clubshell, is under federal status review. Highfin Carpsucker has been deemed in need of management by Tennessee. Due to lack of suitable habitat within the proposed project, the aforementioned species are not anticipated to be present in the project footprint.

Table 6. Records of federal and state-listed aquatic animal species within the Tennessee River (0602000106) 10-digit HUC watershed (TVA EA)[1]

Scientific Name	Common Name	[2]State Rank	[3]State Status	[4]Element Rank	[5]Federal Status
Fishes					
Acipenser fulvescens	Lake Sturgeon	S1	LE	E	-
Carpiodes velifer	Highfin Carpsucker	S2S3	D	E	-
Chrosomus saylori	Laurel Dace	S1	LE	E	LE
Percina tanasi	Snail Darter	S2S3	LT	H?	DL
Mussels					
Cyprogenia stegaria	Fanshell	S1	LE	E	LE, XN
Dromus dromas	Dromedary Pearlymussel	S1	LE	H?	LE, XN
Fusconaia cor	Shiny Pigtoe Pearlymussel	S1	LE	H	LE, XN
Fusconaia subrotunda	Longsolid	S3	-	-	LT
Lampsilis abrupta	Pink Mucket	S2	LE	E	LE
Plethobasus cooperianus	Orange-foot Pimpleback	S1	LE	H?	LE, XN
Plethobasus cyphyus	Sheepnose	S2S3	LE	E	LE
Pleurobema cordatum	Ohio Pigtoe		-	-	
Pleurobema oviforme	Tennessee Clubshell	S2S3	-	H	PE
Pleurobema plenum	Rough Pigtoe	S1	LE	H?	LE, XN
Pleurobema sintoxia	Pyramid Pigtoe	S1S2	-	H?	

[1] Source: TVA Natural Heritage and USFWS IPAC databases queried by Zachary P. Luttrell on 10/20/2025
State Ranks: S1 = Critically Imperiled; S2 = Imperiled; S3 = Vulnerable; SX = Presumed Extirpated; SH = Of historical occurrence in Tennessee, e.g. formally part of the established biota, with the expectation that it may be rediscovered
[3] State Status Codes: D = Deemed in need of conservation; E = Endangered; T = Threatened
[4] Element Rank (=population) Rank; E = Extant record ≤25 years old; H = Historical record >25 years old; H? = Possibly historical; X – Extirpated; BC - Good, or fair estimated viability
[5] Federal Status Code: LT = Listed Threatened; LE = Listed Endangered; PDL = Petitioned for Delisting; XN = Experimental Population, Non-Essential; UR = Under Review

Table 7. Streams in the proposed Waterside RV Park project site in Rhea County, Tennessee

Feature	Upstream Lat/Long:	Downstream Lat/Long:	Length x Width (ft)	WOS Classification	WOTUS Classification
Channel 1	35.4983° -84.8931°	35.4973° -84.8951°	592 x 1	Wet Weather Conveyance	Channel 1 Ephemeral
Channel 2	35.4966° -84.8911°	35.4956° -84.8914°	324 x 2	Stream	Perennial

No Action Alternative

Under the No Action Alternative, TVA would deny the applicant's request for a Section 26a permit for the proposed RV campground and associated facilities. As a result, the new commercial RV development would not be constructed on Chickamauga Reservoir.

Because the proposed development would not proceed under this alternative, no impacts to environmental resources under TVA jurisdiction would occur. The No Action Alternative does not meet the Applicant's purpose and need; however, it serves as the baseline for comparison with the Proposed Action Alternative.

Action Alternative

Under the Action Alternative, the TVA would issue a Section 26a permit to Atlas American Properties, LLC (The Applicant) for the construction and operation of a new RV development on Chickamauga Reservoir in Rhea County, Tennessee and would allow the Applicant to place fill materials within the 100- and 500-year floodplains of the Tennessee River. By allowing these actions, the Section 26a permit would facilitate the development of the Applicant's master-planned RV development for the community. Figure 1 displays the location of TVA's Project Site (approximately 58 acres) which includes the Applicant's overall property boundary. Due to lack of suitable habitat within the proposed project, no impacts to federally listed endangered, threatened, state-listed, or non-listed aquatic species would occur as a result of the proposed action.

Managed and Natural Sites

Managed sites include lands held in public ownership that are managed by an entity (e.g., TVA, US Department of Agriculture, US Forest Service, State of Tennessee) to protect and maintain certain ecological and/or recreational features. Natural sites include ecologically significant sites; federal, state, or local park lands; national or state forests; wilderness sites; scenic sites; wildlife management sites; recreational sites; greenways; trails; Nationwide Rivers Inventory streams; and wild and scenic rivers. Ecologically significant sites are either tracts of privately owned land that are recognized by resource biologists as having significant environmental resources or identified tracts on TVA lands that are ecologically significant but not specifically managed by TVA's Natural Sites program. A review of the TVA Regional Natural Heritage Project database identified four managed and natural sites within three miles of the Project Site (Table 5).

Table 8. Managed/Natural Sites that occur within, adjacent to, or within 3 miles of the Proposed Project Site

Natural Site	Acres	County	State	Miles from project site
Chickamauga Wildlife Management Area (Cottonport unit)	3489.25	Rhea	TN	0
Grassy Creel Cave Protection Planning Site	2873.79	Rhea (TN)	TN	1.735
Harris Cave	4.7	Rhea (TN)	TN	2.103
Conservation Easement – Land Trust for Tennessee	154.09	Meigs (TN)	TN	2.799

No Action Alternative

Under the No Action Alternative, TVA would not approve the proposed development, and no construction or land-disturbing activities would occur within the project site. As a result, the existing land use and ecological conditions would remain unchanged. These nearby managed and natural sites would not be affected by new development. There would be no increase in human activity, infrastructure, or potential indirect impacts such as habitat fragmentation, introduction of invasive species, or increased recreational pressure.

By maintaining the current undeveloped condition of the site, the No Action Alternative would preserve the ecological integrity of the surrounding landscape and avoid any potential adverse effects to nearby managed and natural sites. This alternative would be consistent with TVA's stewardship goals and the broader objectives of protecting ecologically significant resources in the region.

Action Alternative

Under the Action Alternative, TVA would approve the RV Development and associated amenities. The Cottonport unit of the Chickamauga WMA is immediately adjacent to the proposed project site and would see both temporary disturbances during the construction of the RV Camp Site and potentially long-term disturbances from the change of land use in this site. There would be no direct impacts to the WMA; however, hunting activities on the WMA may be altered. Any impacts to the WMA would be indirect and minimized through coordination between the applicant and TWRA; therefore impacts to the WMA would be insignificant. The remaining natural sites are sufficient distance from the project site such that no impacts are anticipated.

Parks and Recreation

Recreation sites include land held in private or public ownership that are managed by an individual or entity (e.g., TVA, US Department of Agriculture, US Forest Service, State of Tennessee) to protect and maintain certain ecological and/or recreational features. Recreation sites include federal, state, or local park lands, national or state forests, scenic sites, wildlife management sites, greenways, trails, Nationwide Rivers Inventory streams, and wild and scenic rivers. Recreation activities include, but are not limited to, nature walking/hiking, camping, bird watching, fishing, hunting, cycling, picnicking, swimming, playgrounds, outdoor sporting events or any other leisurely pastime conducted on public or privately owned or managed land.

TVA conducted a desktop-level review of all recreation sites within a 3-mile radius of the project site utilizing mapping databases such as ArcGIS, Google Earth, and TVA's EGIS. A Low, Medium, or High impact determination with recommendations would be based on the proximity, scale, severity, and duration of the project. Table 7 depicts three developed recreation sites identified to be within a 3-mile radius. One of those sites was identified to be less than one mile away from the project site, and none were identified to overlap with the project site. Some dispersed informal recreational activities such as hunting, nature observation, hiking, and walking for pleasure may occur on some of the lands within or near the proposed project site and related access routes.

Table 9. Recreation Sites of the Project Site

Recreation Site	County	State	Distance/Direction from Project Site
Cottonport Marina and RV Resort	Rhea	TN	0.7 mi southeast
B&R Rifle/Pistol Range	Rhea	TN	1.5 mi northeast
Goodfield Campground	Rhea	TN	2.1 mi east
Water Access			
Tennessee River House/Boat Dock	Rhea	TN	1.6 mi southeast
Goodfield Public Boat Ramp	Rhea	TN	2.1 mi east
Chickamauga Wildlife Management Area (Cottonport unit)	Rhea	TN	0.0 mi east

No Action Alternative

Under the No Action Alternative, the proposed project would not be implemented. Existing conditions within the project site would remain unchanged, and no new construction or land disturbance would occur. This alternative serves as a baseline for evaluating the potential environmental impacts of the proposed action.

While the No Action Alternative would avoid direct impacts to natural resources such as soils, water quality, and prime farmland, it would also result in unrealized recreational opportunities. Potential enhancements would not be developed, limiting the site's ability to support increased recreational use or meet community needs for outdoor activities.

Action Alternative

The Action Alternative has been assessed to have low impacts on localized recreational activities. Disturbances to recreational activities/sites may include scenic degradation, increased noise levels, and traffic pattern disruptions or congestion due to the transport or use of materials and heavy equipment in or around the project site. These anticipated disruptions should be considered temporary while the project is being carried out.
Despite these temporary impacts, the Action Alternative may result in long-term positive benefits for recreation by enhancing access, improving infrastructure, or supporting future recreational use in the site. These improvements could help meet growing public demand for outdoor activities and contribute to the overall recreational value of the region.

In Tennessee, the Tennessee Wildlife Resources Agency (TWRA) is responsible for enforcing the Tennessee Boating Safety Act, which governs boat registrations, safety equipment requirements, and speed limits on state waters. All anticipated impacts to the Wildlife Management Site (WMA) are indirect and are expected to be minimal. These impacts could be further reduced through proactive coordination between the applicant and TWRA to ensure compliance with boating safety regulations and to address any site-specific concerns. The remaining recreational sites in the vicinity are located a sufficient distance from the project site, and no direct or indirect impacts to these sites are anticipated.

Socioeconomics

The Project Site is located in Rhea County, Tennessee near the City of Dayton. The state of Tennessee is the appropriate secondary geographic site of reference, and county demographic information is included for additional context. Comparisons at multiple spatial

scales provide a more detailed characterization of populations that may be affected by the proposed actions. Demographic and economic characteristics of populations within the study site were assessed using the most recent U.S. Census Bureau (USCB) data available, including 2020 Decennial Census counts (USCB 2021) for total population and racial characteristics, 2010 Decennial Census counts (USCB 2011) for population change, and 2019-2023 American Community Survey 5-year estimates (USCB 2023) for the remaining datasets.

The project site is located entirely within one U.S. Census block group (471439752003) and is adjacent to a second block group (471219602003) divided by a waterbody. A one-mile radius from the project site includes both block groups in our study site.

Table 10. Population, Demographics, Income, and Employment in the Project State and County

	Rhea County, Tennessee	State of Tennessee
Population		
Population, 2020	33,299	6,910,840
Population, 2010	31,860	6,346,105
Percent Change 2010-2020	4.5%	8.9%
Persons under 18 years, 2023	23.5%	21.9%
Persons 65 years and over, 2023	19.2%	17.7%
Racial Characteristics		
White alone, 2020 (a)	89.1%	70.9%
Black or African American, 2020 (a)	1.6%	15.7%
American Indian and Alaska Native, 2020 (a)	0.3%	0.2%
Asian, 2020 (a)	1.0%	1.9%
Native Hawaiian and Other Pacific Islander, 2020 (a)	0.02%	0.1%
Some Other Race alone, 2020 (a)	0.2%	0.3%
Two or More Races, 2020	6.0%	3.9%
Hispanic or Latino, 2020	6.1%	6.9%
Income and Employment		
Median household income, 2023	$58,133	$67,097
Persons below poverty level, 2023	15.3%	13.8%
Persons below low-income threshold, 2023	41.7%	34.9%
Percent Unemployed, 2023	3.9%	3.3%

The block group adjacent to the block group which contains the project site is considered to be a low-income population. The percent low-income is meaningfully greater than the percent low income in the state of Tennessee. There is one low-income population identified in block group (471219602003).

Table 11. Percent low income in project site block groups and the state of Tennessee

Block Group Identifier	Low Income
Block group 471439752003	30
Block group 471219602003	46
Tennessee average	35

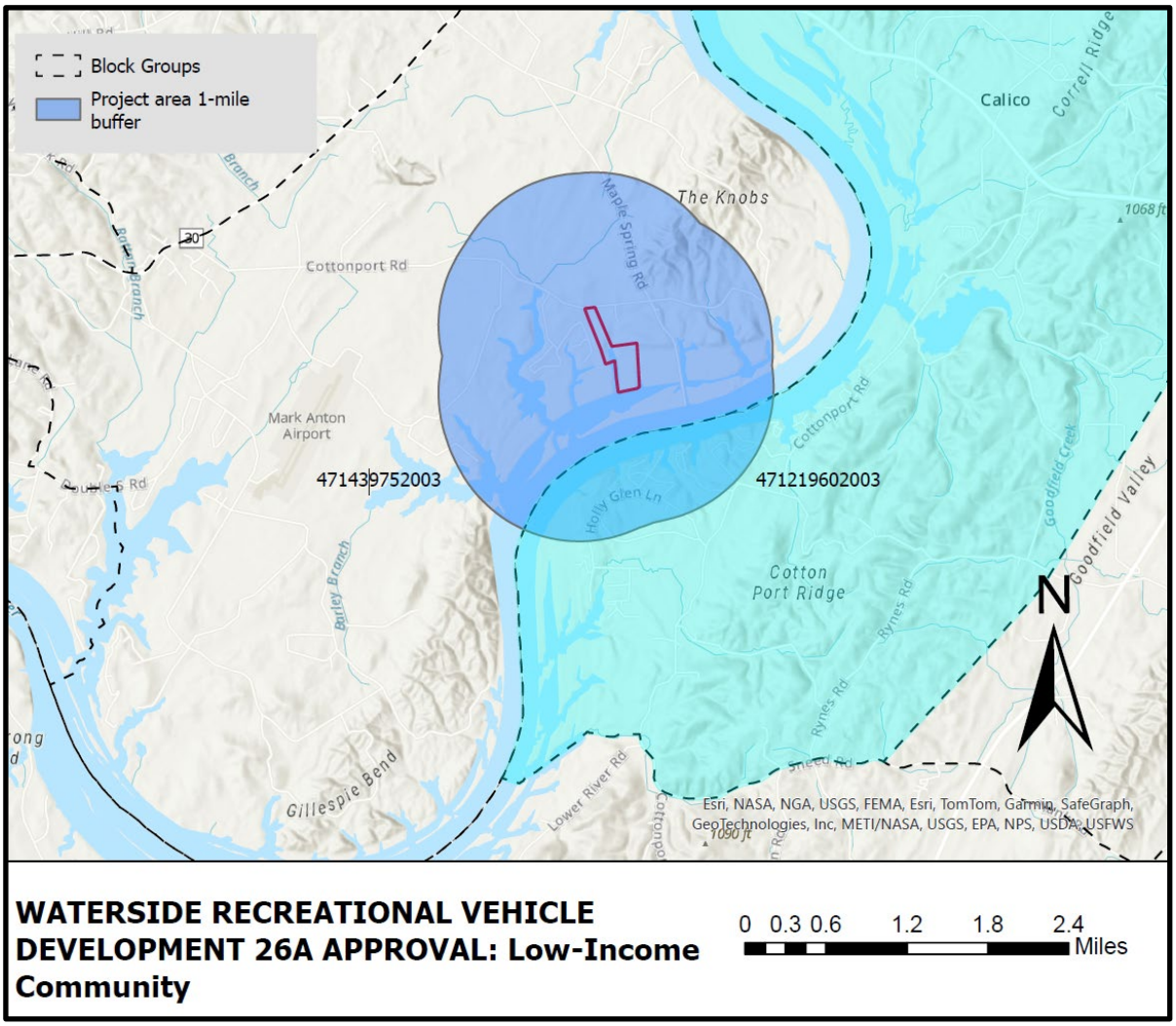


Figure 4. Low-income block groups in 1-mile project site buffer. Blue site shows block group (471219602003) which meets criteria for a low-income population.

No Action Alternative

Under the No Action Alternative, TVA would not approve the proposed RV development. As a result, no direct adverse impacts to socioeconomic conditions in the region would occur. However, the absence of development would result in unrealized economic growth

opportunities for Rhea County. Potential benefits such as increased tourism, job creation, and local business support associated with the RV development would not be realized. This could limit the county's ability to expand its recreation-based economy and capitalize on increased visitor spending, which may otherwise contribute to long-term economic vitality in the site.

Action Alternative

Under the Action Alternative, TVA would approve the RV Camp Site and associated amenities. Because the workforce required to construct the project would be small, any socioeconomic impacts through job creation would be minor and likely not detectable in county or state level statistics. Due to the geographic separation from the low-income population in block group (471219602003), any adverse impacts to that population are unlikely to occur during construction. Operation of the campground may improve the quality of baseline recreational activity in the site and could induce a modest number of recreational trips from individuals and families within and outside of Rhea County that otherwise would not occur. The improved and induced recreational activity would have a minor, long-term positive effect on the local economy through tax revenue and tourism dollars.

Transportation

The proposed Waterside RV Park development is located in Rhea County, Tennessee, adjacent to Chickamauga Reservoir. The project area is accessible via local and regional roadways, including State Route 60 and other county-maintained roads. These roads currently support a mix of residential, agricultural, and recreational traffic. The surrounding transportation infrastructure is generally rural in character, with limited congestion and low to moderate traffic volumes.

The nearest major transportation corridors include U.S. Highway 27 and Interstate 75, which provide regional connectivity to Chattanooga and other urban centers. Local roads leading to the project site are two-lane paved roads that may require minor improvements to accommodate increased traffic during construction and operation of the RV park.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit, and the proposed RV development would not be constructed. As a result, there would be no changes to existing traffic patterns or volumes in the project site. No construction-related traffic or long-term operational traffic would be generated, and no impacts to the local transportation network would occur.

Action Alternative

Under the Proposed Action Alternative, the construction and operation of the Waterside RV Park would result in both temporary and long-term minor impacts to transportation in the site. During the construction phase, which is expected to last between 12 and 36 months, traffic volume on local roads would increase due to the movement of construction workers, delivery trucks, and heavy equipment. The applicant anticipates a peak construction workforce of up to 35 personnel, with typical daily traffic consisting of worker commutes and material deliveries. The volume of trucks towing construction equipment, including excavators, bulldozers, trenchers, and other equipment commonly used in land development, would increase during this period. Although these activities would temporarily increase traffic, the existing road network is expected to accommodate the additional

volume without significant disruption. The applicant would implement best management practices to minimize traffic-related impacts, such as scheduling deliveries during off-peak hours and coordinating with local transportation officials as needed.

Once operational, the RV park would generate ongoing traffic associated with up to 140 RVs, as well as visitors. Traffic to and from the site is expected to increase, particularly during weekends, holidays, and peak recreational seasons. However, the staggered nature of RV arrivals and departures would help distribute traffic over time, reducing the likelihood of congestion. The existing local roadways are anticipated to be sufficient to handle the projected traffic volumes.

Cumulatively, the proposed development may contribute to incremental increases in traffic in the broader site, especially if additional recreational or residential developments occur nearby. However, no significant adverse impacts to transportation infrastructure or traffic safety are anticipated as a result of the Proposed Action. The project is expected to have a minimal and manageable impact on the local transportation network.

Surface Water and Soil Erosion

The proposed project site is located adjacent to Chickamauga Reservoir in Rhea County, Tennessee, within the Tennessee River watershed. The site includes sites within both the 100-year and 500-year floodplains and contains TVA-managed shoreline lands. The topography of the site is gently sloped (0–5 percent), and the shoreline supports emergent wetland vegetation such as cattails and bulrush, which help stabilize soils and reduce erosion potential.

Surface water in the site drains toward Chickamauga Reservoir, which is managed by TVA for multiple purposes including flood control, navigation, power generation, and recreation. The presence of wetlands and vegetated buffers along the shoreline contributes to water quality protection and sediment control.

Chickamauga Reservoir is considered fully supporting of its designated uses: Domestic Water Supply, Industrial Water Supply, Fish and Aquatic Life, Recreation, Livestock Watering and Wildlife, Irrigation, and Navigation (TDEC 2024). The ecological health rating is “good,” consistent with most of the last decade and based on a two-year monitoring cycle by TVA. The rating reflects the status of five key indicators: dissolved oxygen, chlorophyll, sediment quality, bottom-dwelling communities, and fish populations (TVA 2021).

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit for the proposed dock and associated activities in the Project Site. As a result, the Waterside RV Park would not be constructed as currently proposed.

In this scenario, the proposed ground-disturbing activities would not occur, and the existing soil and surface water conditions would remain unchanged. There would be no increased risk of erosion or sedimentation, and the natural shoreline vegetation would continue to provide erosion control and water quality benefits.

Action Alternative

Construction and operation of the Waterside RV Park would involve significant ground disturbance, including:

- Site grading and excavation across approximately 58.0 acres
- Trenching for underground utilities (approximately 3 feet deep by 1 foot wide per trench)
- Installation of step tanks at each of the 140 RV campsites
- Construction of a 6,000-foot-long paved drive with a depth of 2 feet
- Excavation of a 0.8-acre pond, with dredged material reused onsite as fill
- On-site wastewater treatment system

These activities have the potential to increase soil erosion and sedimentation, particularly during the construction phase. However, the applicant has designed the project to avoid placing habitable structures within the 100-year floodplain and to ensure no net fill within the 100-year floodplain, Power Storage Zone, or Flood Storage Zone. This approach helps minimize impacts to surface water flow.

Shoreline activities, such as mowing or bush hogging, are expected to have minimal impacts on erosion due to the gentle slope and the retention of emergent wetland vegetation. The construction of a fixed T-shaped dock on driven pilings is not expected to significantly disturb shoreline soils or alter hydrology.

Any work that alters a stream, river, lake or wetland, like the construction of a dock, requires a water quality permit from TDEC. Specifically, physical changes to waters of the state may require an Aquatic Resource Alteration Permit (ARAP) and/or a Section 401 Water Quality Certification. The ARAP ensures protection of aquatic resources and helps maintain water quality by preventing pollution.

TDEC also regulates subsurface sewage disposal systems through state statutes and regulations. A design review and approval process by the department, site-specific soil evaluations, and permitting for installation ensure proper system function and environmental protection.

The proposed development also includes the construction of a designated dog park. Pet waste is a recognized source of pathogens (e.g. *E.Coli* and *Giardia*) and nutrients such as nitrogen and phosphorus, which can be mobilized by stormwater runoff and transported to nearby surface waters. Nutrients from pet waste can cause algae growth and possibly affect aquatic life. Proper management of the dog park would help prevent potential impacts to surface water.

Because the construction would result in disturbance of greater than 1 acre of land, coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Construction Activities (CGP) or an individual NPDES construction stormwater permit would be required. A site-specific Stormwater Pollution Prevention Plan (SWPPP) must be developed and submitted with the Notice of Intent for permit coverage. The SWPPP details erosion prevention and control measures to protect surface waters from sedimentation. To further mitigate potential

impacts to surface water and soil stability, the applicant would implement Best Management Practices (BMPs) consistent with TVA's Section 26a Standard Conditions. The BMPs are often incorporated into the SWPPP. These may include:

- Silt fencing and sediment barriers
- Stabilized construction entrances
- Prompt revegetation of disturbed sites
- Erosion control matting on slopes
- Stormwater runoff controls

With proper implementation of BMPs and compliance with the applicable permit, impacts to surface water quality and soil erosion are expected to be minor and temporary, and primarily limited to the construction phase.

Geology and Soils

The project site encompasses approximately 58.0 acres of privately owned land and lies within the Valley and Ridge Physiographic Province, which is characterized by elongated ridges and valleys formed by folded and faulted sedimentary rock. The underlying bedrock in this region typically consists of Paleozoic-age limestone, shale, and sandstone formations.

Soils in the project site are primarily derived from alluvial and colluvial deposits and are typical of floodplain and terrace environments. These soils are generally deep, moderately well-drained to somewhat poorly drained, and may include hydric components in low-lying sites. According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soil Survey for Rhea County, common soil series in the site may include the Dewey, Huntington, and Lindside series, which are often found in floodplain settings and are subject to seasonal wetness and flooding.

The project site lies within both the 100-year and 500-year floodplains of the Chickamauga Reservoir. The topography is relatively gentle, with slopes ranging from 0 to 5 percent, particularly near the shoreline. Emergent wetland vegetation, such as cattails and bulrush, is present in some sites, indicating the potential for saturated soils and hydric conditions.

Construction of the proposed RV development would involve significant earth-moving activities, including grading, excavation, trenching, and the placement of fill material to achieve suitable elevations for infrastructure and recreational facilities. These activities would temporarily disturb surface soils and could increase the potential for erosion, sedimentation, and compaction if not properly managed.

To accommodate the development, on-site fill would be placed within the 100-year and 500-year floodplains. The excavation of a 0.8-acre pond, with a maximum depth of 8 feet, would generate fill material that would be reused on site, reducing the need for imported fill and minimizing off-site impacts. Trenching for underground utilities (approximately 3 feet deep and 1 foot wide) and the installation of step tanks at each RV site would also disturb soils but are not expected to result in significant long-term impacts.

To mitigate potential impacts to soils and water quality, the applicant would implement Best Management Practices (BMPs) consistent with TVA's Section 26a Standard Conditions. These may include silt fencing, sediment basins, stabilized construction entrances, and

timely revegetation of disturbed sites. With proper implementation of BMPs, impacts to soils and geology are expected to be minor and temporary.

No blasting or deep excavation into bedrock is proposed, and the project is not expected to significantly alter the underlying geologic structure of the site. The Applicant would coordinate with the U.S. Army Corps of Engineers (USACE) and Tennessee Department of Environment and Conservation (TDEC) to ensure compliance with applicable permitting requirements, including any necessary compensatory mitigation for impacts to wetlands.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit to Atlas American Properties, LLC for the construction and operation of the proposed Waterside RV Park on Chickamauga Reservoir in Rhea County, Tennessee. Without the permit, the applicant would be unable to place fill within the 100-year and 500-year floodplains or construct the associated infrastructure on TVA-managed land, including the proposed community dock and wastewater treatment system. As a result, the RV development would not proceed as currently designed.

This alternative would avoid the temporary and permanent impacts associated with grading, excavation, and fill placement within the floodplain and adjacent shoreline sites. There would be no disturbance to soils, no alteration of floodplain elevations, and no construction-related erosion or sedimentation. Additionally, there would be no increase in impervious surfaces or potential impacts to water quality, wetlands, or adjacent wildlife management sites.

Action Alternative

Under the Action Alternative, TVA would issue a Section 26a permit authorizing the construction and operation of the Waterside RV Park, including the placement of fill within the 500-year floodplain and the development of associated infrastructure on TVA-managed land.

Construction activities would involve grading, trenching, and the placement of onsite fill to achieve suitable elevations for development. A 0.8-acre pond would be excavated, and the dredged material reused onsite as fill, reducing the need for imported material and minimizing offsite impacts.

To protect water quality and soil stability, BMPs would be implemented during construction, including erosion and sediment control measures. These practices would help reduce the potential for sedimentation, runoff, and degradation of nearby aquatic resources. The proposed action is expected to result in minor, short-term adverse impacts to floodplain soils and water quality due to construction activities. These impacts would be localized and temporary and would be adequately mitigated through BMPs and project design features that avoid flood damageable development and ensure no net fill in regulated flood zones. Therefore, the effect determination for floodplains and construction-related soil disturbance is not significant.

Visual Resources

The proposed Waterside RV Park would be located on approximately 58.0 acres of privately owned land adjacent to Chickamauga Reservoir in Rhea County, Tennessee. The project site is characterized by a mix of open fields, scattered tree cover, and emergent wetland

vegetation along the shoreline. The surrounding landscape includes rural residential properties, forested sites, and the nearby Cottonport WMA. Views from the reservoir toward the project site are currently limited by vegetation and topography, although some sites may be visible from the water and adjacent lands.

The visual character of the site is generally rural and natural, with limited built infrastructure. The shoreline is gently sloped (0–5 percent), and the presence of wetland vegetation such as cattails and bulrush contributes to the natural aesthetic of the reservoir edge. The Cottonport WMA, located nearby, provides a scenic and relatively undeveloped backdrop to the project site.

Construction and operation of the proposed RV park would result in moderate changes to the visual landscape. The development of 140 RV campsites, paved roads, and community amenities such as a clubhouse, swimming pool, pickleball courts, and a high-elevation RV storage site would introduce built features into a site that is currently mostly undeveloped. These features, along with the installation of utilities and site grading, would alter the existing visual character of the site.

The most visually prominent elements of the project are likely to include:

- The paved 50-foot-wide, 6,000-foot-long drive and associated grading.
- The clubhouse and other community structures.
- The covered grill stations (30 feet by 20 feet, 8 feet high).
- The fixed T-shaped community dock and walkway on TVA-managed shoreline.
- The RV units themselves, which would be visible when occupied.

While the majority of the development is set back from the shoreline, the dock and limited shoreline vegetation management (e.g., mowing or bush hogging) may result in minor visual changes when viewed from the reservoir. However, due to the gentle slope and existing vegetation, these changes are expected to be minimal and localized.

The applicant has designed the project to avoid placing flood damageable development within the 100-year floodplain, which helps reduce the visual impact on shoreline sites. Additionally, the use of best management practices (BMPs) during construction and operation, including erosion control and vegetation preservation where feasible, would help minimize visual disruption.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit for the proposed dock and associated activities on TVA-managed land. As a result, the Waterside RV Park would not be constructed as currently proposed, or the applicant would need to redesign the project to avoid TVA jurisdiction.

In this scenario, the visual character of the project site would remain largely unchanged. The existing rural and natural landscape, including open fields, shoreline vegetation, and limited development, would be preserved. No new structures, roads, or utilities would be introduced,

and the shoreline would remain in its current condition. Views from the reservoir and adjacent lands would continue to reflect the current undeveloped or lightly developed setting.

The No Action Alternative would avoid any visual impacts associated with construction, grading, lighting, and the presence of RVs and recreational infrastructure. It would also preserve the visual continuity of the site adjacent to the Cottonport WMA.

Action Alternative

Under the Action Alternative, TVA would issue a Section 26a permit to Atlas American Properties, LLC for the construction and operation of the Waterside RV Park. This alternative would result in moderate changes to the visual landscape due to the introduction of infrastructure and increased human activity.

Key visual changes would include:

- Development of 140 RV campsites, each with utility hookups and step tanks, which would introduce repetitive RV visual elements across the site.
- Construction of a 50-foot-wide, 6,000-foot-long paved drive, which would be a prominent linear feature visible from within and potentially outside the site.
- Community amenities, including a clubhouse, swimming pool, pickleball courts, dog park, and playground, which would add vertical and structural elements to the landscape.
- Ten covered grill stations (30 feet by 20 feet by 8 feet high) and a high-elevation RV storage site, which may be visible from nearby elevated viewpoints or across the reservoir.
- A fixed T-shaped community dock and walkway on TVA-managed shoreline, which would be visible from the water and potentially from adjacent shoreline sites.

Although the majority of the development would occur on private land, the dock and shoreline vegetation management (e.g., mowing or bush hogging) could result in minor visual changes along the reservoir edge. However, due to the gentle slope and existing vegetation, these changes are expected to be localized and not visually dominant and therefore minor.

The applicant has designed the project to avoid placing habitable structures within the 100-year floodplain, which helps reduce visual encroachment into shoreline sites. BMPs would be implemented to minimize erosion and preserve vegetation where feasible.

Given the proximity to the Cottonport WMA, the proposed development may result in minor visual impacts to the Cottonport WMA.

Noise

The proposed project site is located in a rural site of Rhea County, Tennessee, adjacent to Chickamauga Reservoir. Existing ambient noise levels in the site are expected to be low, typical of rural environments, and primarily influenced by natural sounds (e.g., wind, wildlife, water movement) and occasional human activity such as recreational boating, residential use, and agricultural operations.

There are no major highways, industrial facilities, or high-density developments in the immediate vicinity of the project site. The Cottonport WMA, located nearby, is managed for conservation and low-impact recreation, and is generally considered a quiet zone.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit for the proposed dock and associated activities on TVA-managed land. As a result, the Waterside RV Park would not be constructed as currently proposed.

In this scenario, no construction or operational noise would be introduced. Ambient noise levels would remain consistent with current rural and natural conditions, and there would be no disturbance to nearby residents, recreational users, or wildlife from project-related noise.

Action Alternative

Under the Action Alternative, construction and operation of the Waterside RV Park would introduce both temporary and long-term noise sources to the site. Construction activities would include site grading, excavation, trenching, utility installation, road paving, and building construction. These activities would involve the use of heavy equipment such as bulldozers, excavators, backhoes, and trucks, which are typical sources of elevated noise levels. Construction noise would be temporary and occur primarily during daylight hours.

Potential impacts include temporary increases in noise levels at and near the construction site, short-term disturbance to nearby residents and recreational users (including those in the Cottonport WMA), and temporary displacement of wildlife sensitive to noise.

Once operational, the RV park would generate ongoing noise from a variety of sources. Vehicle traffic within the park would contribute to background noise, particularly during peak occupancy periods. Recreational activities such as use of the swimming pool, pickleball courts, and playground would also generate intermittent noise throughout the day. Community amenities, including the clubhouse and grill stations, would serve as gathering points and could contribute to elevated noise levels during social events or group activities. In addition, routine maintenance activities such as mowing, trash collection, and utility servicing would produce periodic mechanical noise.

These noise sources are expected to be moderate and typical of recreational RV parks. Noise levels would vary depending on occupancy, time of day, and season, with the greatest increases likely occurring during weekends and peak vacation periods. Given the rural setting, these changes may be noticeable but are not expected to exceed thresholds considered significant for residential or recreational land uses. The applicant's design, which retains vegetative buffers and avoids development directly on the shoreline, would help reduce noise propagation to adjacent sites.

Solid and Hazardous Waste

The proposed project site is currently undeveloped and does not generate solid or hazardous waste. Existing land use is rural and natural, with no known history of industrial activity or waste disposal. There are no known hazardous waste sites, landfills, or regulated waste storage facilities on or adjacent to the property. Waste generation in the surrounding site is minimal and primarily residential or recreational in nature.

No Action Alternative

Under the No Action Alternative, TVA would not issue a Section 26a permit for the proposed dock and associated activities on TVA-managed land. As a result, the Waterside RV Park would not be constructed as currently proposed.

In this scenario, no construction or operational waste would be generated, and the site would remain in its current undeveloped condition. There would be no increase in solid or hazardous waste generation, and no new waste management infrastructure would be required.

Action Alternative

Under the Action Alternative, construction and operation of the Waterside RV Park would result in the generation of both solid and limited quantities of potentially hazardous waste.

During construction, solid waste would be generated from land clearing, grading, trenching, and building activities. This would include vegetative debris such as brush, trees, and grass removed during site preparation. Construction materials including wood, concrete, asphalt, and packaging would also contribute to the waste stream. Scrap metal and piping from utility installation and infrastructure development would be produced, along with general construction refuse such as discarded materials and containers.
All construction-related waste would be collected and disposed of in accordance with local and state regulations. Any hazardous materials used during construction—such as fuels, lubricants, paints, or solvents—would be properly stored, handled, and disposed of in compliance with applicable environmental regulations to prevent spills or contamination.

Once operational, the RV park would generate solid waste typical of recreational and residential use. Household waste would be produced by RV occupants, while additional waste would result from the use of community amenities such as the clubhouse, kitchen, restrooms, and laundry facilities. Landscaping and maintenance activities would generate organic debris such as grass clippings, leaves, and small branches.

Solid waste would be collected regularly and transported to a permitted municipal solid waste facility. Waste receptacles would be strategically placed throughout the site, and proper containment would be used to prevent littering and minimize the attraction of wildlife.

The proposed on-site wastewater treatment system, which includes fiberglass tanks and a subsurface disposal field, is not expected to generate hazardous waste under normal operating conditions. However, routine maintenance of the treatment system may produce small quantities of sludge or other residuals. These materials would be managed and disposed of by a licensed contractor in accordance with state and federal regulations.

No long-term storage or disposal of hazardous waste is proposed as part of the project. With proper waste management practices in place, the project is not expected to result in significant impacts related to solid or hazardous waste.

Necessary Permits or Licenses

All necessary permits, permit modifications, licenses, and approvals would be obtained by the Applicant for activities it implements within the Project Site. The list below identifies additional regulations, programs, permits, approvals, or other authorizations from federal, state, or local authorities that may be required before the Project Site could be developed for specific use by the Applicant:

- *TVA Section 26a*
- *USACE 404*
- *TDEC State Operation Permit*

- *TN Aquatic Resource Alteration Permit (ARAP) and/or a §401 Water Quality Certification*
- *TDEC NPDES Stormwater Construction Permit*
- *TDEC NPDES General Hydrostatic Test Water Permit*
- *TDEC Highway Entrance Permit*
- *Rhea County Regional Planning Commission Road Connection Approval*

Mitigation Measures

Through the project planning and permitting process, numerous design modifications have been incorporated into the Proposed Action Alternative that avoid or minimize impacts to sensitive resources identified within the Project Site.

In addition to the standard conditions for a Section 26a permit and other necessary permits, which include mitigation measures, BMPs and other requirements, TVA would require the Applicant to implement the following mitigation measures to avoid, minimize, or resolve adverse impacts on the environment:

Floodplains

1. The RV park owner and/or operator would evaluate utility connections to ensure that the utilities would not promote unwise development in the 100-year floodplain
2. For all RV park electrical services permitted, a cutoff would be located at or above the 500-year flood elevation 694.4 that is accessible during flooding
3. The floor elevation of RV park open fixed docks would be a minimum of 2.0 feet above the full summer pool elevation 682.5
4. The applicant agrees that spoil material (material not used for park roads and other site development) would be disposed of and contained on land lying and being above the 500-year flood elevation contour 694.4 and outside the 500-year floodplain. Every precaution would be made to prevent the reentry of the spoil material into the reservoir.
5. Covered pavilions, gazebos, and/or barbeque pits belonging to the RV park would remain open to the elements and never enclosed in the future. No flood-damageable items or equipment would be stored under them
6. Covered pavilions, gazebos, and/or barbeque pits belonging to individual RV site owners would remain open to the elements and never enclosed in the future
7. All RV owner flood-damageable items or equipment would be stored at an elevation of at least 694.4
8. The floor elevation of RV owner open fixed docks would be a minimum of 2.0 feet above the full summer pool elevation 682.5
9. Recreational Vehicle means a vehicle which is:
    a. Built on a single chassis;
    b. 400 square feet or less when measured at the largest horizontal projection;
    c. Designed to be self-propelled or permanently towable by a light duty truck; and
    d. Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use.

10. RVs are to be on the site for fewer than 180 consecutive days, and be fully licensed and ready for highway use. A recreational vehicle is ready for highway use if it is on its wheels or jacking system, is attached to the site only by quick disconnect type utilities and security devices, and has no permanently attached additions.
11. RVs and RV sites are to have no permanently attached additions
12. Site owners are to be aware that
    a. This site is subject to flooding
    b. TVA retains the right to flood the land to elevation 698
    c. Larger floods can and do occur
13. Site owners are responsible for monitoring the National Weather Service and other information sources for potential flooding
14. For all RV owner electrical services permitted, a cutoff would be located at or above the 500-year flood elevation 694.4 that is accessible during flooding
15. Electricity would be installed with transformers on small, elevated berms at least one foot above base flood elevation, which would be at minimum elevation 692.5
16. Septic tanks would be held down with concrete deadmen to reduce buoyancy

Surface Water and Soil Erosion

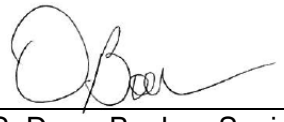
1. Implement and maintain erosion and sediment control BMPs throughout construction.
2. Schedule construction activities to avoid periods of heavy rainfall when erosion risk is highest.
3. Stabilize disturbed soils as soon as practicable using vegetation, mulch, or erosion control blankets.
4. Preserve existing shoreline vegetation to the maximum extent feasible.
5. Monitor stormwater runoff and sediment control structures regularly and after major rain events.

Noise

1. Maintain equipment in good working condition and use mufflers or noise-reducing devices where feasible.
2. Preserve existing vegetation around the perimeter of the site to serve as a natural sound buffer.
3. Design community amenities to be centrally located within the site to reduce noise spillover to adjacent properties and conservation sites.
4. Post quiet hours for RV park guests to minimize nighttime noise.

Conclusion and Findings

Based on the findings in this Environmental Assessment, we conclude that the Proposed Action of TVA issuing a Section 26a permit as part of the Applicant's proposed recreational vehicle development along the Tennessee River waterfront of Chickamauga Reservoir would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.



12/31/2025

S. Dawn Booker, Senior Manager
NEPA Compliance
Tennessee Valley Authority

Date Signed

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Appendix A- Tennessee State Historic Preservation Officer Correspondence

TENNESSEE VALLEY AUTHORITY

400 West Summit Hill Drive, Knoxville, Tennessee 37902

November 3, 2025

Ms. Miranda Montgomery
State Historic Preservation Officer
Tennessee Historical Commission
2941 Lebanon Road
Nashville, Tennessee 37243-0442

Dear Ms. Montgomery:

TENNESSEE VALLEY AUTHORITY (TVA), SECTION 106, SECTION 26A, SAM PINNER ON BEHALF OF WATERSIDE RV DEVELOPMENT, CHICKAMAUGA RESERVOIR, RHEA COUNTY, TENNESSEE (35.494980, -84.890935) (TVA TRACKING NUMBER – CRMS ID 116970173729)

TVA proposes to issue a Section 26a permit to Sam Pinner for the development of a new RV campground. The proposed project footprint is located along Cottonport Road in Dayton, Tennessee on Chickamauga Reservoir in Rhea County. The project footprint is located on the right descending bank of the Tennessee River at river mile 512.6. The applicant proposes to develop a new campground consisting of 140 recreational vehicle (RV) campsites (60 feet x 150 feet; 50 feet x 175 feet) on 58.0 acres. Each campsite would be serviced with underground electricity, water, and sewer connections (utility lines- 3 feet deep, 1 foot wide; step tanks- 5 feet x 3.75 feet (each)). The applicant is also requesting to construct ten covered concrete pads with grill stations (30 feet x 20 feet x 8 feet), community amenities (office, pickle ball courts, pool, clubhouse, dog park, bathrooms, laundry room, kitchen, playground (dimensions to be determined), and high elevation RV storage. The applicant also proposes to excavate a single 0.8-acre pond (max. 8 feet in depth) and construct a paved drive (50 feet x 6,000 feet x 2 feet (depth)) with appropriate grading. In addition, the applicant proposes to construct an on-site wastewater treatment plant (23 feet x 12 feet x 12 feet) with two 15,000-gallon fiberglass tanks, one 20,000-gallon fiberglass tank, and a disposal field which will be located above the 500-year floodplain. The applicant is also seeking approval to construct a fixed community T-dock (30 feet x 4 feet) with fixed access walkway (30 feet x 6 feet) on driven pilings. The proposed community dock is located on TVA fee-owned property. The remainder of the proposed undertaking is located on private property outside the 500-year floodplain.

TVA determined the area of potential effects (APE) to be the area of proposed ground-disturbance, where physical effects could occur within the 58.0-acre area as well as areas within a half-mile radius of the project within which the project would be visible, where visual effects on above-ground resources could occur (Figures 2-3).

TVA Cultural Resources staff conducted background research of the APE using historic USGS topographic maps (1935, 1942, 1943 [1946 edition], 1967 [1969, 1970 editions], Big Spring, TN) 7.5-minute quadrangles, TVA's internal databases and land acquisition maps, current satellite

imagery, National Register of Historic Places (NRHP) data, previous survey reports, the US Department of Agriculture, Soil Conservation Service Web Soil Survey (WSS), the Tennessee Division of Archeology (TDOA) Site File Viewer, TVA's Native American Removal Routes (NARR) database and the National Parks Service's listed Native American Removal Routes, the Tennessee Property Viewer, and historic architecture surveys data depicted in the Tennessee Historical Commission (THC) Viewer.

The desktop review for this project found no properties listed or eligible for listing on the NRHP or properties inventoried by the THC. TVA's land acquisition map and historic USGS topographic maps show no structures recorded at the proposed project footprint. A review of TVA's NARR database indicates that there are no known terrestrial or riverine segments within the footprint or in close proximity.

A review of the TDOA site file viewer, and TVA's Cultural Resource Management System (CRMS), indicates the southern portion of the proposed project footprint has been subjected to a shoreline survey and a systematic cultural resource survey (Elliot 1993; Hoksbergen & Alexander 2005; Clute & Alexander 2007). TVA's shoreline survey of Chickamauga in the 1990s recorded one site within the current project footprint. Site 40RH166 consisted of a sparse lithic scatter [redacted] The site was revisited in 2005 by Alexander Archaeological Consultants (AAC) as part of a Phase I survey for a proposed development of areas below the 700-foot contour on Chickamauga Reservoir. The Phase I survey consisted of systematic shovel tests at 30-meter intervals, with a 10-meter interval used for delineating around sites (Hoksbergen & Alexander 2005). The results of the survey determined that site 40RH166 required additional testing in order to determine its NRHP eligibility. Phase II testing was conducted on 40RH166 in 2007 (Clute & Alexander). Results of the testing concluded that site 40RH166 was a medium density open habitation camp dating to Middle-Late Archaic and Woodland time periods. The site was recommended to be ineligible for NRHP inclusion, and no further work was recommended (Clute & Alexander 2007). TVA has read the cultural survey reports on site 40RH166 and agrees that no additional testing is required for site 40RH166.

The Phase I survey conducted in 2005 also identified sites 40RH284 and 40RH285 [redacted] within the current proposed project footprint (Figure 4). According to the TDOA site file, the artifacts identified at site 40RH284 consisted of a low-density scatter of prehistoric lithic debitage. [redacted]
Subsurface investigations are required to determine if any intact portions of the site are present and determine the extent of the site within the currently proposed project footprint.

Site 40RH285 was recorded as a low-density precontact artifact scatter. [redacted] The site was recommended to be ineligible for NRHP inclusion, and no further work was recommended (Hoksbergen & Alexander 2005). [redacted]

Both TDOA and TVA records indicate the northern portion (approximately 25.0 acres) of the proposed project footprint has not been subjected to a systematic cultural resource survey. The applicant retained TRC to conduct a Phase I cultural survey. To allow for design flexibility and provide coverage for future development, the survey area was expanded to 39.0 acres (Figure 5). A detailed discussion of the project, area of APE, methods used, and the results of the TRC Phase I survey are provided in a separate report titled, *Phase I Cultural Resources Survey for the Proposed Development of a New RV Campground, Sam Pinner, Rhea County, Tennessee.* The survey found no evidence of intact archaeological deposits within the APE. TRC recommended no additional research prior to construction.

TRC's architectural survey was conducted on August 25, 2025. TRC recorded two new architectural resources (HS-1 and HS-2) during their survey. HS-1 and HS-2 were documented and assessed for inclusion on the NRHP. TRC recommends that newly recorded architectural resources HS-1 and HS-2 are not eligible for inclusion on the NRHP due to their lack of architectural and historical significance.

TVA has reviewed TRC's report and agrees with their recommendations. TVA finds that the proposed undertaking located would have no effect on historic resources.

Given the absence of any historic architectural properties listed in, or eligible for listing in the NRHP and the absence of intact archaeological sites within the project footprint, TVA finds that this undertaking would have no effects on historic properties. No further work is recommended.

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

Pursuant to 36 CFR Part 800.4(d)(1) we are notifying you of TVA's finding of no historic properties affected; providing the documentation specified in § 800.11(d); and inviting you to review the finding. Also, we are seeking your agreement with TVA's eligibility determinations and TVA's finding that the undertaking as currently planned will have no effects on historic properties.

Please contact Charlene A. Rode by email, crode@tva.gov with your comments.

Sincerely,

Michaelyn Harle
Manager, Cultural Project Reviews, Environment and Economic Development and
Deputy Federal Preservation Officer
Cultural Resources

CAR: ERB
Enclosures
cc (Enclosures):

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

Reference Cited:

Clute, Richard D., and L.S. Alexander
2006 *Phase II Testing of Sites 40RH166, 40RH167, and 40RH282 in Cottonport Development, at Tennessee River Mile 512.5, Rhea County, Tennessee. Prepared by Alexander Archaeological Consultants, Inc., Wildwood, GA.* Prepared for Hayes & Associates, Inc., Jefferson City, TN and Tennessee Valley Authority,Office of Natural Resources, Norris, TN.

Elliott, Daniel T., Marvin T. Smith, Charles McNutt, Jr. and Guy Weaver
1993 *Chickamauga Reservoir Archaeological Site Inventory: Results of Survey from 1987 to 1993*. Garrow & Associates, Inc., Atlanta, Georgia. Submitted to TV A, Norris, Tennessee.

Hoksbergen, B. J., and L. S. Alexander
2005 *A Phase I Archaeological Survey of a Proposed Development, Rhea County, Tennessee. Prepared by Alexander Archaeological Consultants, Inc., Wildwood, GA.* Prepared for Hayes & Associates, Inc., Jefferson City, TN and Tennessee Valley Authority, Office of Natural Resources, Norris, TN.

Stephens, Sarah, Colin Bean, and Ted Karpynec
2025 *Phase I Cultural Resources Survey for the Proposed Development of a New RV Campground, Sam Pinner, Rhea County, Tennessee*.

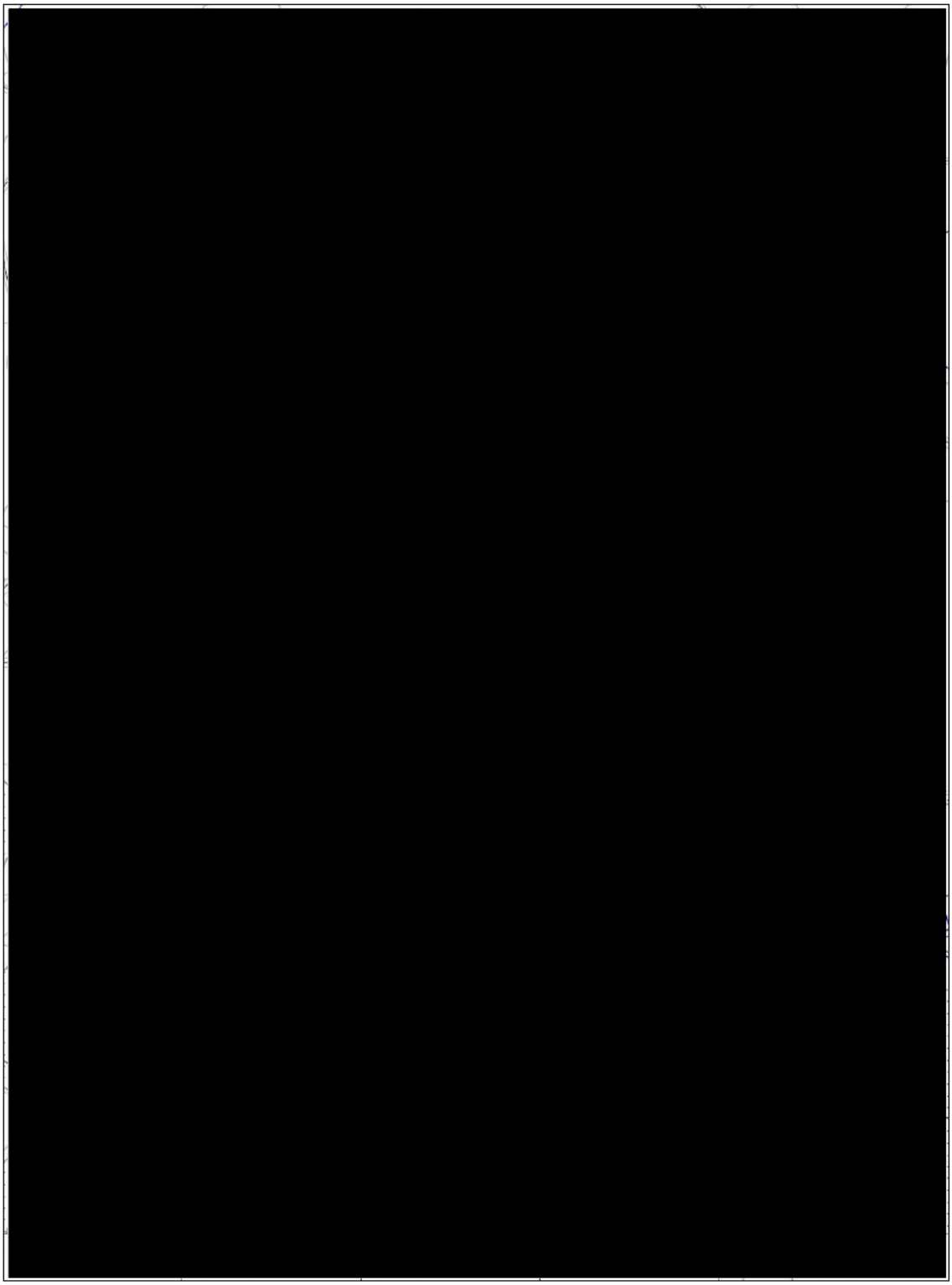

Figure 1. Proposed development plan, submitted by the applicant.

Figure 2. Viewshed APE on the Big Spring, TN 7.5-minute quadrangle. Taken from Stephens et al 2025.

Figure 3. Project boundary on modern aerial imagery.

Figure 4. Previously recorded site boundaries with the project boundary and survey areas on the Big Spring, TN 7.5-minute quadrangle.

Figure 5. Required and recommended archaeological Phase I survey area with project boundaries, on modern aerial imagery.

From:	TN Help
To:	Beliles, Emily
Cc:	Harle, Michaelyn S; Rode, Charlene
Subject:	Waterside RV Development, Chickamauga Reservoir, CRMS 116970173729 - Project # SHPO0007957
Date:	Monday, November 3, 2025 5:20:48 PM
Attachments:	Miranda Sig.png image

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

2025-11-03 16:20:20 CST

Dr. Michaelyn Harle
Tennessee Valley Authority

RE: Tennessee Valley Authority (TVA), Waterside RV Development, Chickamauga Reservoir, CRMS 116970173729, Project#: SHPO0007957, Dayton, Rhea County, TN

Dear Dr. Michaelyn Harle:

In response to your request, we have reviewed the cultural resources survey report and accompanying documentation submitted by you regarding the above-referenced undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

Considering the information provided, we find that no historic properties eligible for listing in the National Register of Historic Places will be affected by this undertaking. If project plans are changed or archaeological remains are discovered during project construction, please contact this office to determine what further action, if any, will be

necessary to comply with Section 106 of the National Historic Preservation Act. Please provide your Project # when submitting any additional information regarding this undertaking. Questions or comments may be directed to Kelley Reid, who drafted this response, at Kelley.Reid@tn.gov.

Sincerely,

Miranda Montgomery
State Historic Preservation Officer

Ref:MSG18020494_nhyMeirDC6g8OLwqgDX

Attachment B – Natural Resources

Project Review Form - TVA Bat Strategy *(06/2019)*

*This form should **only** be completed if project includes activities in Tables 2 or 3 (STEP 2 below). This form is not required if project activities are limited to Table 1 (STEP 2) or otherwise determined to have no effect on federally listed bats. If so, include the following statement in your environmental compliance document (e.g., add as a comment in the project CEC): "Project activities limited to Bat Strategy Table 1 or otherwise determined to have no effect on federally listed bats. Bat Strategy Project Review Form NOT required." This form is to assist in determining required conservation measures per TVA's ESA Section 7 programmatic consultation for routine actions and federally listed bats.*[1]

Project Name: Waterside RV Park at Chickamauga Reservoir Commercial Recreation Agreement **Date:** Apr 1, 2025

Contact(s): Timothy Perkins **CEC#:** **Project ID:** 4035386

Project Location (City, County, State): Dayton, Rhea, Tennessee

Project Description:

Atlas American Properties, LLC intends to build a 14 RV camp site plus amenities. All amenities and storage facilities will be above TVA property, and no permanent structures will be in the flowage easement. In addition to the RV pads and roads applicant in requesting 1 basic fixed T dock that is 4'x30' with 30'x6' fixed access walkways on driven pilings. Each site will have 5x 4.5 step tank.

SECTION 1: PROJECT INFORMATION - ACTION AND ACTIVITIES

STEP 1) Select TVA Action. If none are applicable, contact environmental support staff, Environmental Project Lead, or Terrestrial Zoologist to discuss whether form (i.e., application of Bat Programmatic Consultation) is appropriate for project:

- ☐ 1 Manage Biological Resources for Biodiversity and Public Use on TVA Reservoir Lands
- ☐ 2 Protect Cultural Resources on TVA-Retained Land
- ☐ 3 Manage Land Use and Disposal of TVA-Retained Land
- ■ 4 Manage Permitting under Section 26a of the TVA Act
- ☐ 5 Operate, Maintain, Retire, Expand, Construct Power Plants
- ☐ 6 Maintain Existing Electric Transmission Assets
- ☐ 7 Convey Property associated with Electric Transmission
- ☐ 8 Expand or Construct New Electric Transmission Assets
- ☐ 9 Promote Economic Development
- ☐ 10 Promote Mid-Scale Solar Generation

STEP 2) Select all activities from Tables 1, 2, and 3 below that are included in the proposed project.

TABLE 1. Activities with no effect to bats. Conservation measures & completion of bat strategy project review form NOT required.

☐ 1. Loans and/or grant awards	☐ 8. Sale of TVA property	☐ 19. Site-specific enhancements in streams and reservoirs for aquatic animals
☐ 2. Purchase of property	☐ 9. Lease of TVA property	☐ 20. Nesting platforms
☐ 3. Purchase of equipment for industrial facilities	☐ 10. Deed modification associated with TVA rights or TVA property	☐ 41. Minor water-based structures (this does not include boat docks, boat slips or piers)
☐ 4. Environmental education	☐ 11. Abandonment of TVA retained rights	☐ 42. Internal renovation or internal expansion of an existing facility
☐ 5. Transfer of ROW easement and/or ROW equipment	☐ 12. Sufferance agreement	☐ 43. Replacement or removal of TL poles
☐ 6. Property and/or equipment transfer	☐ 13. Engineering or environmental planning or studies	☐ 44. Conductor and overhead ground wire installation and replacement
☐ 7. Easement on TVA property	☐ 14. Harbor limits delineation	☐ 49. Non-navigable houseboats

TABLE 2. Activities not likely to adversely affect bats with implementation of conservation measures. Conservation measures and completion of bat strategy project review form REQUIRED; review of bat records in proximity to project NOT required.

☐ 18. Erosion control, minor	☐ 57. Water intake - non-industrial	☐ 79. Swimming pools/associated equipment
☐ 24. Tree planting	☐ 58. Wastewater outfalls	☐ 81. Water intakes – industrial
☐ 30. Dredging and excavation; recessed harbor areas	☐ 59. Marine fueling facilities	■ 84. On-site/off-site public utility relocation or construction or extension
☐ 39. Berm development	☐ 60. Commercial water-use facilities (e.g., marinas)	☐ 85. Playground equipment - land-based
☐ 40. Closed loop heat exchangers (heat pumps)	☐ 61. Septic fields	☐ 87. Aboveground storage tanks
☐ 45. Stream monitoring equipment - placement and use	■ 66. Private, residential docks, piers, boathouses	■ 88. Underground storage tanks
☐ 46. Floating boat slips within approved harbor limits	☐ 67. Siting of temporary office trailers	☐ 90. Pond closure
☐ 48. Laydown areas	☐ 68. Financing for speculative building construction	☐ 93. Standard License
■ 50. Minor land based structures	☐ 72. Ferry landings/service operations	☐ 94. Special Use License
☐ 51. Signage installation	■ 74. Recreational vehicle campsites	☐ 95. Recreation License
☐ 53. Mooring buoys or posts	■ 75. Utility lines/light poles	☐ 96. Land Use Permit
■ 56. Culverts	☐ 76. Concrete sidewalks	

Table 3: Activities that may adversely affect federally listed bats. Conservation measures AND completion of bat strategy project review form REQUIRED; review of bat records in proximity of project REQUIRED by OSAR/Heritage eMap reviewer or Terrestrial Zoologist.

☐ 15. Windshield and ground surveys for archaeological resources	☐ 34. Mechanical vegetation removal, includes trees or tree branches > 3 inches in diameter	☐ 69. Renovation of existing structures
☐ 16. Drilling	☐ 35. Stabilization (major erosion control)	☐ 70. Lock maintenance/ construction
■ 17. Mechanical vegetation removal, does not include trees or branches > 3" in diameter (in Table 3 due to potential for woody burn piles)	■ 36. Grading	☐ 71. Concrete dam modification
☐ 21. Herbicide use	☐ 37. Installation of soil improvements	☐ 73. Boat launching ramps
☐ 22. Grubbing	■ 38. Drain installations for ponds	■ 77. Construction or expansion of land-based buildings
☐ 23. Prescribed burns	☐ 47. Conduit installation	■ 78. Wastewater treatment plants
☐ 25. Maintenance, improvement or construction of pedestrian or vehicular access corridors	☐ 52. Floating buildings	☐ 80. Barge fleeting areas
☐ 26. Maintenance/construction of access control measures	☐ 54. Maintenance of water control structures (dewatering units, spillways, levees)	☐ 82. Construction of dam/weirs/ levees
☐ 27. Restoration of sites following human use and abuse	☐ 55. Solar panels	☐ 83. Submarine pipeline, directional boring operations
☐ 28. Removal of debris (e.g., dump sites, hazardous material, unauthorized structures)	☐ 62. Blasting	☐ 86. Landfill construction
☐ 29. Acquisition and use of fill/borrow material	☐ 63. Foundation installation for transmission support	☐ 89. Structure demolition
■ 31. Stream/wetland crossings	☐ 64. Installation of steel structure, overhead bus, equipment, etc.	☐ 91. Bridge replacement
☐ 32. Clean-up following storm damage	☐ 65. Pole and/or tower installation and/or extension	☐ 92. Return of archaeological remains to former burial sites
☐ 33. Removal of hazardous trees/tree branches		

STEP 3) Project includes one or more activities in Table 3? ◉ **YES (Go to Step 4)** ○ **NO (Go to Step 13)**

STEP 4) Answer questions *a* through *e* below (applies to projects with activities from Table 3 ONLY)

a) Will project involve continuous noise (i.e., ≥ 24 hrs) that is greater than 75 decibels measured on the A scale (e.g., loud machinery)?

- (•) **NO** (NV2 does not apply)
- ( ) **YES** (NV2 applies, subject to records review)

b) Will project involve entry into/survey of cave?

- (•) **NO** (HP1/HP2 do not apply)
- ( ) **YES** (HP1/HP2 applies, subject to review of bat records)

c) If conducting **prescribed burning** (**activity 23)**, estimated acreage**:** [ ] and timeframe(s) below; [■] **N/A**

STATE	SWARMING	WINTER	NON-WINTER	PUP
GA, KY, TN	[ ] Oct 15 - Nov 14	[ ] Nov 15 - Mar 31	[ ] Apr 1 - May 31, Aug 1- Oct 14	[ ] Jun 1 - Jul 31
VA	[ ] Sep 16 - Nov 15	[ ] Nov 16 - Apr 14	[ ] Apr 15 - May 31, Aug 1 – Sept 15	[ ] Jun 1 - Jul 31
AL	[ ] Oct 15 - Nov 14	[ ] Nov 15 - Mar 15	[ ] Mar 16 - May 31, Aug 1 - Oct 14	[ ] Jun 1 - Jul 31
NC	[ ] Oct 15 - Nov 14	[ ] Nov 15 - Apr 15	[ ] Apr 16 - May 31, Aug 1 - Oct 14	[ ] Jun 1 - Jul 31
MS	[ ] Oct 1 - Nov 14	[ ] Nov 15 - Apr 14	[ ] Apr 15 - May 31, Aug 1 – Sept 30	[ ] Jun 1 - Jul 31

d) Will the project involve vegetation piling/burning?

- (•) **NO** (SSPC4/ SHF7/SHF8 do not apply)
- ( ) **YES** (SSPC4/SHF7/SHF8 applies, subject to review of bat records)

e) If **tree removal (activity 33 or 34)**, estimated amount: [ ] ( )**ac** ( )**trees** (•)**N/A**

STATE	SWARMING	WINTER	NON-WINTER	PUP
GA, KY, TN	[ ] Oct 15 - Nov 14	[ ] Nov 15 - Mar 31	[ ] Apr 1 - May 31, Aug 1- Oct 14	[ ] Jun 1 - Jul 31
VA	[ ] Sep 16 - Nov 15	[ ] Nov 16 - Apr 14	[ ] Apr 15 - May 31, Aug 1 – Sept 15	[ ] Jun 1 - Jul 31
AL	[ ] Oct 15 - Nov 14	[ ] Nov 15 - Mar 15	[ ] Mar 16 - May 31, Aug 1 - Oct 14	[ ] Jun 1 - Jul 31
NC	[ ] Oct 15 - Nov 14	[ ] Nov 15 - Apr 15	[ ] Apr 16 - May 31, Aug 1 - Oct 14	[ ] Jun 1 - Jul 31
MS	[ ] Oct 1 - Nov 14	[ ] Nov 15 - Apr 14	[ ] Apr 15 - May 31, Aug 1 – Sept 30	[ ] Jun 1 - Jul 31

If warranted, does project have flexibility for bat surveys (May 15-Aug 15): ( ) **MAYBE** ( ) **YES** (•) **NO**

**** For **PROJECT LEADS** whose projects will be reviewed by a Heritage Reviewer (Natural Resources Organization only), **STOP HERE**. Click File/ Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date", and submit with project information. Otherwise continue to Step 5. ****

SECTION 2: REVIEW OF BAT RECORDS (applies to projects with activities from Table 3 ONLY)

STEP 5) Review of bat/cave records conducted by Heritage/OSAR reviewer?

( ) **YES** (•) **NO** (Go to Step 13)

Info below completed by:

[ ] **Heritage Reviewer**	(name)		Date	
[ ] **OSAR Reviewer**	(name)		Date	
[■] **Terrestrial Zoologist**	(name)	Emily Doub	Date	May 2, 2025

Gray bat records: [ ] None [☒] Within 3 miles* [☒] Within a cave* [☒] Within the County

Indiana bat records: [☒] None [ ] Within 10 miles* [ ] Within a cave* [ ] Capture/roost tree* [ ] Within the County

Northern long-eared bat records: [ ] None [☒] Within 5 miles* [ ] Within a cave* [☒] Capture/roost tree* [☒] Within the County

Virginia big-eared bat records: [☒] None [ ] Within 6 miles* [ ] Within the County

Caves: [ ] None within 3 mi [☒] Within 3 miles but > 0.5 mi [ ] Within 0.5 mi but > 0.25 mi* [ ] Within 0.25 mi but > 200 feet* [ ] Within 200 feet*

Bat Habitat Inspection Sheet completed? (•) **NO** ( ) **YES**

Amount of SUITABLE habitat to be removed/burned (may differ from STEP 4e): [ ] **(**( )**ac** ( )**trees)*** (•)**N/A**

STEP 6) Provide any additional notes resulting from Heritage Reviewer records review in Notes box below then . . . . . Go to Step 13

Notes from Bat Records Review (e.g., historic record; bats not on landscape during action; DOT bridge survey with negative results):

STEPS 7-12 To be Completed by Terrestrial Zoologist (if warranted):

STEP 7) Project will involve:

- ☐ Removal of suitable trees within 0.5 mile of P1-P2 Indiana bat hibernacula or 0.25 mile of P3-P4 Indiana bat hibernacula or any NLEB hibernacula.
- ☐ Removal of suitable trees within 10 miles of documented Indiana bat (or within 5 miles of NLEB) hibernacula.
- ☐ Removal of suitable trees > 10 miles from documented Indiana bat (> 5 miles from NLEB) hibernacula.
- ☐ Removal of trees within 150 feet of a documented Indiana bat or northern long-eared bat maternity roost tree.
- ☐ Removal of suitable trees within 2.5 miles of Indiana bat roost trees or within 5 miles of Indiana bat capture sites.
- ☐ Removal of suitable trees > 2.5 miles from Indiana bat roost trees or > 5 miles from Indiana bat capture sites.
- ☐ Removal of documented Indiana bat or NLEB roost tree, if still suitable.
- ☒ N/A

STEP 8) Presence/absence surveys were/will be conducted: ○ **YES** ◉ **NO** ○ **TBD**

STEP 9) Presence/absence survey results, on _____ ○ **NEGATIVE** ○ **POSITIVE** ◉ **N/A**

STEP 10) Project ○ **WILL** ◉ **WILL NOT** require use of Incidental Take in the amount of _____ ○ **acres or** ○ **trees** proposed to be used during the ○ **WINTER** ○ **VOLANT SEASON** ○ **NON-VOLANT SEASON** ◉ **N/A**

STEP 11) Available Incidental Take (prior to accounting for this project) as of _____

TVA Action	Total 20-year	Winter	Volant Season	Non-Volant Season
4 Manage Permitting under Section 26a of the TVA Act				

STEP 12) Amount contributed to TVA's Bat Conservation Fund upon activity completion: $ _____ OR ◉ **N/A**

TERRESTRIAL ZOOLOGISTS, after completing SECTION 2, review Table 4, modify as needed, and then complete section for Terrestrial Zoologists at end of form.

SECTION 3: REQUIRED CONSERVATION MEASURES

STEP 13) Review Conservation Measures in Table 4 and ensure those selected are relevant to the project. If not, manually override and uncheck irrelevant measures, and explain why in ADDITIONAL NOTES below Table 4.

Did review of Table 4 result in ANY remaining Conservation Measures in **RED**?

- ○ **NO** (Go to Step 14)
- ◉ **YES** (STOP HERE; Submit for Terrestrial Zoology Review. Click File/Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date", and submit with project information).

Table 4. TVA's ESA Section 7 Programmatic Bat Consultation Required Conservation Measures

The Conservation Measures in Table 4 are automatically selected based on your choices in Tables 2 and 3 but can be manually overridden, if necessary. To Manually override, press the button and enter your name.

Manual Override

Name: Emily Doub

Check if Applies to Project	Activities Subject To Conservation Measure	Conservation Measure Description
☒	15, 16, 17, 18, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 45, 47, 48, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 90, 91, 92, 93, 94, 95, 96	**NV1** - Noise will be short-term, transient, and not significantly different from urban interface or natural events (i.e., thunderstorms) that bats are frequently exposed to when present on the landscape.
☒	69, 77, 89, 91	**AR1** - Projects that involve structural modification or demolition of buildings, bridges, and potentially suitable box culverts, will require assessment to determine if structure has characteristics that make it a potentially suitable unconventional bat roost. If so a survey to determine if bats may be present will be conducted. Structural assessment will include: o Visual check that includes an exhaustive internal/external inspection of building to look for evidence of bats (e.g., bat droppings, roost entrance/exit holes); this can be done at any time of year, preferably when bats are active. o Where accessible and health and safety considerations allow, a survey of roof space for evidence of bats (e.g., droppings, scratch marks, staining, sightings), noting relevant characteristics of internal features that provide potential access points and roosting opportunities. Suitable characteristic may include: gaps between tiles and roof lining, access points via eaves, gaps between timbers or around mortise joints, gaps around top and gable end walls, gaps within roof walling or around tops of chimney breasts, and clean ridge beams. o Features with high-medium likelihood of harboring bats but cannot be checked visually include soffits, cavity walls, space between roof covering and roof lining. o Applies to box culverts that are at least 5 feet (1.5 meters) tall and with one or more of the following characteristics. Suitable culverts for bat day roosts have the following characteristics: • Location in relatively warm areas • Between 5-10 feet (1.5-3 meters) tall and 300 ft (100 m) or more long • Openings protected from high winds • Not susceptible to flooding • Inner areas relatively dark with roughened walls or ceilings • Crevices, imperfections, or swallow nests o Bridge survey protocols will be adapted from the Programmatic Biological Opinion for the Federal Highway Administration (Appendix D of USFWS 2016c, which includes a Bridge Structure Assessment Guidance and a Bridge Structure Assessment Form). o Bat surveys usually are NOT needed in the following circumstances: • Domestic garages /sheds with no enclosed roof space (with no ceiling) • Modern flat-roofed buildings • Metal framed and roofed buildings • Buildings where roof space is regularly used (e.g., attic space converted to living space, living space open to rafters) or where all roof space is lit from skylights or windows. Large/tall roof spaces may be dark enough at apex to provide roost space

■	16, 17, 18, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 48, 50, 51, 52, 53, 54, 55, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 70, 71, 73, 76, 77, 78, 80, 81, 82, 83, 86, 87, 88, 89, 90	**SSPC2** - Operations involving chemical/fuel storage or resupply and vehicle servicing will be handled outside of riparian zones (streamside management zones) in a manner to prevent these items from reaching a watercourse. Earthen berms or other effective means are installed to protect stream channel from direct surface runoff. Servicing will be done with care to avoid leakage, spillage, and subsequent stream, wetland, or ground water contamination. Oil waste, filters, other litter will be collected and disposed of properly. Equipment servicing and chemical/fuel storage will be limited to locations greater than 300-ft from sinkholes, fissures, or areas draining into known sinkholes, fissures, or other karst features.
■	17, 18, 21, 22, 24, 25, 26, 30, 31, 33, 34, 35, 36, 40, 46, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 66, 67, 68, 69, 70, 72, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 87, 88, 91, 93, 95, 96	**SSPC5** (**26a, Solar, Economic Development only**) - Section 26a permits and contracts associated with solar projects, economic development projects or land use projects include standards and conditions that include standard BMPs for sediment and contaminants as well as measures to avoid or minimize impacts to sensitive species or other resources consistent with applicable laws and Executive Orders.
■	16, 26, 36, 37, 38, 39, 48, 50, 52, 59, 60, 62, 66, 67, 69, 72, 75, 77, 78, 79, 86	**L1** - Direct temporary lighting away from suitable habitat during the active season.
■	16, 26, 36, 37, 38, 39, 48, 50, 52, 59, 60, 62, 66, 67, 69, 72, 75, 77, 78, 79, 86	**L2** - Evaluate the use of outdoor lighting during the active season and seek to minimize light pollution when installing new or replacing existing permanent lights by angling lights downward or via other light minimization measures (e.g., dimming, directed lighting, motion-sensitive lighting).

[1]Bats addressed in consultation (02/2018), which includes gray bat (listed in 1976), Indiana bat (listed in 1967), northern long-eared bat (listed in 2015), and Virginia big-eared bat (listed in 1979).

Hide All Unchecked Conservation Measures

- (•) HIDE
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Hide Table 4 Columns 1 and 2 to Facilitate Clean Copy and Paste

- ( ) HIDE
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NOTES (additional info from field review, explanation of no impact or removal of conservation measures).

STEP 14) Save completed form (Click File/Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date") in project environmental documentation (e.g. CEC, Appendix to EA) AND send a copy of form to batstrategy@tva.gov
Submission of this form indicates that Project Lead/Applicant:

Timothy Perkins (name) is (or will be made) aware of the requirements below.

- Implementation of conservation measures identified in Table 4 is required to comply with TVA's Endangered Species Act programmatic bat consultation.
- TVA may conduct post-project monitoring to determine if conservation measures were effective in minimizing or avoiding impacts to federally listed bats.

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☒ Terrestrial Zoologist acknowledges that Project Lead/Contact (name) Timothy Perkins has been informed of any relevant conservation measures and/or provided a copy of this form.

☐ For projects that require use of Take and/or contribution to TVA's Bat Conservation Fund, Terrestrial Zoologist acknowledges that Project Lead/Contact has been informed that project will result in use of Incidental Take ____ ○ ac ○ trees and that use of Take will require $ ____ contribution to TVA's Conservation Fund upon completion of activity (amount entered should be $0 if cleared in winter).

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Appendix B. Migratory Birds of Conservation Concern

Black-billed cuckoos reside in forested areas and are summer residents in the eastern portion of the power service area. They nest in tangled portions of trees, usually about 7 feet from the ground and forage for caterpillars in the overstory (Cornell 2025a). Suitable nesting habitat and foraging habitat exists within the Project Area.

Canada warbler breed in the Appalachian Mountains. They nest on the ground in moist areas, preferably in thickets or areas with thick ferns and feed on insects on understory vegetation (Cornell 2025b). Suitable nesting habitat and foraging habitat for Canada warbler exists within the Project Area.

Cerulean warbler utilizes closed-canopy habitat within forested stands containing numerous well-spaced, large trees. These areas are typically found within old-growth deciduous communities, particularly in floodplains or other areas of mesic condition. They forage high in the canopy for insects (Buehler et al. 2020). Suitable nesting and foraging habitat is not present in the Project Area.

Chimney swift can be found in the power service area during breeding season. This species is associated with human settlements and primarily uses chimneys as nesting habitat; when chimneys are unavailable, swifts may utilize tree cavities other human-made structures, such as barns, silos, and vents made out of porous materials such as brick, stone, or mortar (Cornell 2025c). They forage over a variety of habitats, including open terrain, forests, and residential areas (Steeves et al. 2020). Suitable foraging habitat for chimney swift is available within the Project Area, while suitable nesting habitat is not available within the Project Area for chimney swift.

Chuck-will's-widow is found in dry woodlands in the Southeast, from pine barrens to oak-hickory and mixed deciduous woodlands. This species calls and forages at dusk, predawn, and at night. (Cornell 2025d). Suitable nesting habitat for this species does exist within the Project Area.

Eastern whip-poor-will breeds in forested areas with little to no understory. They place their nests directly on leaf litter (Cornell 2025e). Suitable nesting habitat for this species does not exist within the Project Area.

Kentucky warbler breeds in Alabama between mid-April and late August. During this period, Kentucky warbler uses lowland hardwood forest, often near streams, with a dense understory. Large tracts of forest habitat are required for nesting (over 1,200 acres), though gaps such as treefall gaps, trails, and small roads are important for creating a patchwork of shaded and well-lit areas. This species mostly forages along forest floors, though they will also feed on insects in the understory and lower parts of trees (Cornell 2025f). Suitable foraging and nesting habitat are not present within the Project Area

Prairie warbler migrates to the southeastern U.S. to breeding from May through July in shrubby habitats with open canopies, ranging from pine forests, scrub oak barrens, regenerating forests, and borders of forest and prairie. This species places their nests in tangled parts of trees and shrubs. This species forages for insects, spiders, and snails in shrubby habitats (Cornell 2025g). The Project Area is suitable for nesting and foraging prairie warblers.

Appendix B. Migratory Birds of Conservation Concern

Prothonotary warbler breeds and forages throughout most of the southeastern U.S. in bottomland forests, wooded swamps, and forests near lakes and streams between April and July. Nests are placed in holes created by woodpeckers and chickadees, in natural holes in standing dead trees, and in nest boxes (Cornell 2025h). Suitable nesting habitat is not present in the Project Area, although some foraging habitat is available.

Red-headed woodpeckers are present within the Project Area year-round. This species is a cavity nester of deciduous woodlands with oak or beech, groves of dead or dying trees, river bottoms, recent clearings, grasslands with scattered trees, forest edges, and roadsides. Foraging for insects and fruit occurs within that same deciduous habitat and breeding occurs from mid-May through mid-September (Cornell 2025i). Suitable nesting habitat for red-headed woodpecker is not available but foraging habitat is present within the Project Area.

Rusty blackbird breeds in Alaska, Canada, and the northeastern U.S. In their wintering range this species may use flooded woods, edges of ponds and streams, and adjacent fields (Avery 2020). No perennial streams or pond boundaries are present within the Project Area. The Project Area may contain marginally suitable winter habitat for rusty blackbird in wooded areas along the reservoir but breeding habitat is not present in the Project Area.

Wood thrush breeds throughout much of the southeastern U.S. This species can be found in mature deciduous and mixed forests, in fragmented forests and suburban parks. Ideal habitat includes trees over 50 feet tall, a moderate understory of saplings and shrubs, and an open forest floor with moist soil and decaying leaf litter with water nearby. In Tennessee, nesting occurs from early May through late August, and nests are placed in saplings or shrubs. Foraging occurs primarily on leaf-litter invertebrates and shrub fruits (Cornell 2025j). Suitable nesting and foraging habitats are present in the Project Area.