

August 31, 2003

Mr. David Nye
ROS Project Manager
Tennessee Valley Authority
WT 11A
400 West Summit Hill Drive
Knoxville, TN 37902

Dear Mr. Nye;

The Tennessee Ornithological Society is a state-wide organization comprised of over 900 members and 12 local chapters across the state devoted to the enjoyment, scientific study and conservation of birds. Founded in 1915, our organization is the oldest conservation organization in the state of Tennessee. We would like to express concerns with the results of the Reservoir Operations Study and associated Draft Environmental Impact Statement.

It is apparent that many of the alternative reservoir management scenarios outlined in the ROS that would maintain higher water levels during the late summer, fall and winter months would result in significant reductions of important habitat for migrating shorebirds, wading birds, and waterfowl, as well as some species of songbirds and raptors. Currently, a large portion of shorebird foraging habitat available to migrating shorebirds during late summer, and early fall months found in the Tennessee Valley is located within the TVA reservoir system. Unfortunately, this habitat is not quantified. Nor does the study discuss the availability of alternative habitats or the proportion of shorebirds, wading birds, and waterfowl in the Tennessee Valley that are dependent on this habitat. This information is critical to the development of measures to mitigate the adverse affects of higher water levels.

We have noted that a few important shorebird areas on mainstream reservoirs, including Pace Point on Kentucky and Savannah Bay on Chickamauga, no longer support the late summer/early fall shorebird populations that they did during the 1970s and 1980s (although these areas remain important habitats). This is probably a result of stabilized water levels introduced in the early 1990s, although we cannot determine from the very brief description of previous reservoir policy changes whether this is indeed the case. An explanation of the reduced shorebird numbers at these locations would help in further evaluating the effects of the currently proposed changes.

Among the species that would be adversely affected by increased lake levels are several species included on the US Fish and Wildlife Service 2002 List of Birds of Conservation Concern. These species include Little Blue Heron, Peregrine Falcon, Buff-breasted Sandpiper, Semipalmated Sandpiper, Short-billed Dowitcher, Prothonotary warbler and Louisiana Waterthrush. Alternative lake management scenarios outlined in the ROS may

also adversely affect foraging areas used by the Federally Threatened Piping Plover. We are concerned that the DEIS makes no mention of most of these species or the potential impact that increased lake levels may have on their populations.

We believe higher lake levels maintained during fall and winter months will be detrimental to wintering waterfowl populations as well as to wintering Sandhill Cranes. The largest population of wintering Sandhill Cranes in the Southeastern US north of the Georgia-Florida border area is found in the upper Chickamauga Reservoir. These birds require exposed mudflats for critical evening roosting sites and for foraging grounds.

We find it difficult to evaluate the birds in Appendix Table D6a-01 because there is no accompanying key in the "Reaches" column. This table lists the Swainson's Warbler (which is also on the USFWS 2002 List of Birds of Conservation Concern) as being potentially directly affected in upland habitats. This species also occurs in bottomland forests in the Kentucky Reservoir area (and potentially in similar habitats elsewhere). These populations could be affected by water level changes in this reservoir and are, in fact, probably adversely affected by the current practice of periodic overfilling of the reservoir in late spring.

Our organization urges TVA to carefully consider the detrimental effects to bird populations that may result from many of the policy alternatives. We are strongly opposed to all alternatives that call for maintaining high lake levels. We further suggest that if such alternative is selected that mitigation areas be established to replace important bird habitats lost due to changes in lake level management. We are disappointed that such mitigation measures are not described in the draft EIS; their absence limits the opportunity for the public to evaluate and comment on them.

We are also concerned and surprised that wildlife-dependent recreation activities including hunting and non-consumptive wildlife viewing are generally ignored in your recreation analyses, even though they are often directly dependent on reservoir waters. Based on results of the 2001 National Survey of Fishing, Hunting, and Wildlife Associated Recreation, these activities are likely more popular than several activities your survey did address. Therefore, we question the results of your survey and the dependent recreation impact analyses.

We greatly appreciated the opportunity to express our opinions regarding the Reservoir Operation Study.

Sincerely,

<<signed>>

Virginia Reynolds, President
Tennessee Ornithological Society