

[submitted by email]

TENNESSEE ORNITHOLOGICAL SOCIETY

April 26, 2002

Following are the comments of the Tennessee Ornithological Society on issues to be addressed in the Reservoir Operations Study. The TOS is a non-profit organization founded in 1915 to promote the enjoyment, scientific study, and conservation of birds. We are the oldest conservation organization in Tennessee and have about 900 members. For many years we have been involved in a wide variety of cooperative natural resource management projects with several agencies in Tennessee, including the Tennessee Valley Authority.

The resources provided by TVA's reservoir system that we value most are the associated public lands, the habitat for wildlife, including endangered species, that the reservoir system provides, and the opportunities for wildlife-oriented recreation. Our top priority in reservoir operations is the maintenance and enhancement of publicly owned reservoir lands and waters for wildlife and endangered species. A secondary priority is the enhancement of opportunities for the public to enjoy these resources in ways that minimally impact them.

The changes in reservoir operations made as a result of the Lake Improvement Study were generally beneficial to wildlife. Delaying the summer drawdown to August 1, in particular, increased the amount of previously scarce habitat for shorebirds during their fall migration. This result occurs as the receding water levels exposed expanses of moist flats during the shorebirds critical August and September migration periods. Rankin Bottoms on Douglas Lake, for example, now supports thousands of use-days for shorebirds, as well as herons, egrets, and other species. We are aware of the demands on TVA to further delay reservoir drawdowns into the fall. Such a delay would be detrimental to the populations of many birds which migrate through the Valley in late summer and early fall. We urge you to inventory bird habitats that would be affected by changes in drawdown schedules. We also urge you to evaluate how changes in drawdown schedules would affect the large waterfowl populations that winter on Valley reservoirs.

We believe the management of the shoreline around TVA's reservoirs is inseparable from the reservoir operations and feel that TVA's recent record in managing its reservoir lands has been mixed. The Shoreline Management Policy was a large step forward in codifying environmentally responsible shoreline management. TVA has not, however, uniformly or consistently applied this policy in areas such as granting new residential development rights. We also see little hope in TVA attaining the SMP's stated goal of promptly completing land management plans for all reservoirs. We urge TVA to renew its dedication to the principals of the SMP.

The ROS, as presently defined, will focus on increasing the public value of reservoir system operating policies. We therefore anticipate that economic analyses will figure largely in the final decision. The state of the art in economic valuations of many natural resources is poorly developed compared to areas such as flood control and power supply. Because of this, we are concerned that many natural resource issues, such as endangered species populations or shorebird use-days, may not be adequately quantified in ROS economic analyses. We look forward to seeing your resolution of this concern.

Sincerely,

Charles P. Nicholson
President, Tennessee Ornithological Society