

Susan

September 8, 2005

Mr. Gary S. Hartman  
U.S. Department of Energy  
Oak Ridge Office (SE-32)  
P.O. Box 2001  
Oak Ridge, Tennessee 37831

Subject: Draft Environmental Assessment (EA) U.S. Department of Energy Conveyance of Parcel ED-6 to the City of Oak Ridge, Tennessee (August 2005, DOE/EA-1514)

Dear Mr. Hartman:

The Citizens' Advisory Panel (CAP) of the Oak Ridge Reservation Local Oversight Committee (LOC) has reviewed the subject EA on the conveyance of Parcel ED-6. The CAP has identified several deficiencies in the document which relate to the planned actions of DOE and the City. As it stands, the draft EA does not provide an adequate assessment of the environmental impacts of the Proposed Action, including impacts on the adjoining Black Oak Ridge Conservation Easement (BORCE). We request that the draft EA be strengthened as noted below.

<!--[if !supportLists]-->• <!--[endif]-->**A map showing the location of biologically sensitive areas on Parcel ED-6 should be included in the EA** to guide the involved parties in determining non-developable land.

<!--[if !supportLists]-->• <!--[endif]-->**The straight line boundary between Parcel ED-6 and the BORCE should be modified so that it follows the topography.** The boundary should conserve as much developable land on Parcel ED-6 as reasonable (generally ridgetops and gently sloping areas) while removing sensitive lands, tributary streams, and steep slopes from the west side of the parcel. It is our understanding that the boundary was based on a map discussed during the Land-Use Planning Focus Group with an example boundary drawn by hand. This should be better refined to represent a reasonable boundary based on topography and development needs of the City of Oak Ridge and which also protects the most ecologically valuable land.

<!--[if !supportLists]-->• <!--[endif]-->**The environmental impact of constructing a new boundary road should be discussed.** The report notes that construction of a 30-ft wide boundary-patrol and fire-suppression road would be a direct result of the Proposed Action as well as the Mixed Development and Conservation Easement Alternatives. However, the draft EA does not show the likely route(s) of the patrol road nor does it evaluate its environmental impact. If the patrol road crosses steep ridges and stream tributaries, it will have a large impact on the watershed due to erosion of the steep terrain. Cutting a wide road through deep forest will also affect wildlife habitat on the BORCE as well as destroy the forested buffer zone between residential development and the conservation easement.

It is not clear to the CAP why a boundary road is at all necessary as the BORCE is not related to any active DOE mission and considering that a 30-ft wide boundary road will have a substantial negative impact on the east end of the conservation easement. The EA notes that fire protection of Parcel ED-6 will be adequately covered by existing city

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resources. Because fires tend to spread uphill and downwind, the remainder of the BORCE is unlikely to be at risk from a fire originating in the residential area. The decision to build a road primarily for fire-suppression should be ratified by the State, which has the responsibility for management of the BORCE.

The CAP appreciates the opportunity to review and comment on the Parcel ED-6 conveyance EA. If you have any questions, please contact the LOC office at 483-1333.

Sincerely,

Norman A. Mulvenon  
Chair, LOC Citizens' Advisory Panel

cc: LOC Register  
LOC Board  
LOC CAP  
Pat Halsey, FFA Coordinator  
John Owsley, Director, TDEC DOE-O  
Amy Fitzgerald, City of Oak Ridge  
Kerry Trammell, Chair, ORSABB  
Cindy Kendrick, Chair, TCWP  
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Chair, AFORR  
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