



Tennessee  
Citizens for  
Wilderness  
Planning

---

**Taking Care of Wild Places**

October 23, 2014

Mr. Larry Kelly  
Manager Department of Energy Oak Ridge Operations  
Federal Building  
200 Administrative Road  
Oak Ridge, TN 37830

Dear Mr. Kelly:

The Board of Directors of Tennessee Citizens for Wilderness Planning (TCWP) was surprised and concerned to learn of a pending request for transfer of a portion of the natural area on Parcel ED-1 (Horizon Center) from the Department of Energy (DOE) to the City of Oak Ridge. At the City of Oak Ridge Industrial Development Board (IDB) meeting held on Monday, October 6, 2014, there was discussion of a proposal to request such transfer of an approximately 10-20 acre parcel located within the Horizon Center that is presently designated natural area. The stated purpose of the proposed transfer would be to facilitate marketing of two IDB parcels (Development Areas 6 and 7) currently separated by the natural area as one larger parcel.

The natural area in question constitutes an important wildlife corridor connecting bottomland hardwood forest on the East Fork Poplar Creek floodplain with the upland forest of the Black Oak Ridge Conservation Easement (BORCE). Such corridors are critical for a wide variety of wildlife, including small mammals, birds, amphibians, and reptiles. The importance of this particular corridor is enhanced by the presence of a tributary stream to East Fork Poplar Creek. This stream flows for most of the year and also provides important aquatic habitat and hydrologic functions. The establishment of the Parcel ED-1 natural area together with the wildlife corridors was a crucial part of the Mitigation Action Plan which allowed DOE a Mitigated Finding of No Significant Impact for the project. These wildlife corridors are discussed more fully in the original EA (DOE/EA-1113) and subsequent NEPA documents concerning Parcel ED-1.

Any change of ownership or land use involving any of the DOE property at Parcel ED-1 retained as natural areas would require careful and thorough evaluation by DOE in consultation with cognizant federal and state resource management agencies (for example, U.S. Fish and Wildlife Service and Tennessee Department of Environment and Conservation) and non-governmental conservation groups such as TCWP. Moreover, we

believe that any reduction to the existing wildlife corridor would have to be mitigated in a fashion that maintains the wildlife and hydrologic functions of the area that would be removed from the natural area. Any proposal to substitute other land for this natural area parcel would require a careful and thorough evaluation for suitability as a functional substitute in order to preserve the original conditions established in the Mitigation Action Plan. Some of the characteristics to be considered would include physical location, suitability of current habitat, and already-existing wildlife and hydrologic functions of any proposed trade land. It is incumbent on DOE to demonstrate that the same or more ecological and hydrological functions would be maintained.

Sincerely,

A handwritten signature in black ink, appearing to read "James P. Groton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

James P. Groton

President, Tennessee Citizens for Wilderness Planning (TCWP)

Cc Anne Davis, Southern Environmental Law Center  
Carol Borgstrom, DOE Office of NEPA Policy and Compliance