

**Advocates For the Oak Ridge Reservation**

136 West Revere Circle, Oak Ridge, Tennessee 37830

[www.kornnet.org/aforr/](http://www.kornnet.org/aforr/)

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Oct. 4, 2004

**Richard L. Toennisson  
TVA, NEPA Administration  
400 W. Summit Hill Drive  
Knoxville, Tn. 37902**

**Dear Mr. Toennisson**

**The Advocates For the Oak Ridge (AFORR) are glad to submit the following land use recommendations for the 1200 acre former Clinch River Breeder Reactor Site. We hope the EIS incorporates our recommendations because we feel this is the best compromise for conservation and industrial development.**

**Sincerely**

**Dev. Joslin  
Board Member,**

**Advocates For the Oak Ridge Reservation  
136 Revere Circle  
Oak Ridge, TN. 37830**

**Phone 865 483 0849**

**Land Use Zone Recommendation  
For TVA's former Clinch River Breeder Reactor [CRBR]Site**

**Overview of this Recommendation: See Enclosed Map**

We recommend:

(A) that all of the upland area on the northern half of this peninsula be designated as Zone 4 (Natural Resource Conservation).

(B) that portions of the disturbed and level area at the southern end of the peninsula be designated for Zone 5 (Economic Development), but that the portion designated for economic development should be limited to the area previously disturbed by prior construction for the CRBR and the relatively level land immediately surrounding it to the north and away from the reservoir.

(C) A strip between 75 m and 300 m wide should be maintained along the edge of the reservoir within this parcel. This strip should reach approximately to the 780-foot contour line along most of the shoreline, dipping down to form a narrow strip only to the 760-foot contour line in the immediate vicinity of the CRBR. Parcel 144—previously designated for natural resource management—and a similar strip of shoreline along parcel 142 could easily be incorporated into this strip, and should be.

**Reasons for Recommendations by Category:**

**(A) above: Upland Areas for Natural Resource Management (Zone 4)**

These parcels are ideal for natural resource (or sensitive resource management) because:

- (1) They are immediately adjacent to the thousands of contiguous forested acres of the DOE Oak Ridge Reservation. Since this land is a protected, nearly-continuous block of relatively unfragmented "wildland," zoning these adjacent TVA parcels for natural resource management would serve as an excellent addition to the conservation value of this neighboring land. Furthermore, such connectedness between the parcels enhances its potential for hunting and other natural resource-related recreation.
- (2) Most of this area is already currently managed by TWRA for wildlife and hunting. Most of it has been undisturbed or undeveloped for decades, and makes excellent habitat for deer, wild turkey, woodcock, and other mammals and birds. The area is also adjacent to a large inlet at the mouth of Grassy Creek, which is heavily used by waterfowl. Rare plants have been documented on Parcel 146 on

the steep slope above Grassy Creek and this small parcel should remain designated as Zone 3 (Sensitive Resource Management).

These parcels in A (Zone 4) are NOT suitable for residential, commercial or industrial development because:

- (1) Most of this area is very steep and rugged terrain
- (2) UNSAFE FOR DEVELOPMENT: These parcels are immediately downwind of radioactive and mixed waste incinerators on Bear Creek Road. Incinerators are located just a few hundred meters in the valley below the ridge above Grassy Creek. Radioactive contamination of the vegetation on this ridge from these incinerators (albeit at a low level) is very well-documented. This land is therefore not safe for residential development from a health standpoint.
- (3) UNSAFE and unappealing for residential development: Portions of the area within hundreds of yards of one firing range (and within a mile of a second) operated by the federal government along Bear Creek road. The area on the DOE reservation immediately northeast of the ridge above Grassy Creek is officially off-limits to human activity because it is in the danger zone for these firing ranges. Because of the possibility of residents wandering into these danger zones, this area is unsafe for residential development. Furthermore, the continual noise from the firing range would not be an appealing feature for potential home-buyers.
- (4) Who would want to build or buy a residence or commercial establishment under conditions described in (a), (b), and (c) above?

**B above: Area suitable for Economic Development (Zone 5):**

The area around the former CRBR site has been considerably disturbed in the past. For this reason and because it is relatively flat and currently has an access road and potential access to utilities most of this parcel appears suitable for industrial development. The exception is a strip along the shoreline that is the described in the next section.

**C above: Strip of Shoreline for Sensitive Resource Management (Zone 3)**

This shoreline strip is prime shoreline wildlife habitat because it is a mixture of shoreline mudflats, sloughs and wetlands, and other forested areas forming unique habitat for numerous species of mammals, birds, and other fauna. Its value is increased by the fact that it adjoins miles of shoreline already protected as part of DOE's Oak Ridge Reservation. Its immediate proximity to Grubb Islands (and downstream location from other islands) makes it particularly valuable with respect to nesting habitat for waterfowl.

Dev. Joslin For AFORR.