

**Obed Watershed Community Association**  
**Draft Environmental Impact Statement Scoping Comments**  
**Development of Cumberland County Water Supply System**

No. 12

Obed Watershed Community Association

October 2006

*Comments presented by OWCA Executive Director Louise Gorenflo at the September 19, 2006 DEIS Scoping Public Meeting conducted by the Army Corps of Engineers.*

1. The intent of the DEIS is to provide NEPA coverage for the planning, design, construction, and operational features of a county water supply project capable of providing the county a reliable water supply for 50 years. The purpose of the water supply project is to increase the county's water supply capacity to enable high population growth and intensive housing development.
2. The Corp's Preliminary Environmental Review and the Breedlove, Dennis, Young & Associates needs assessment studies identified a range of growth options ranging from 7.3 MGD to 68.3 MGD.
3. These studies projected the 2050 population of Cumberland County ranging from no growth to three-quarters of a million.
7. The Corps' unlimited and median growth scenarios, along with the BDY growth scenarios, would have a very large environmental, economic, social, and cultural impact on our community. The impacts of providing a means for a large water supply in and of itself pale in comparison to the growth it would enable: three-quarters of a million people living in our community in 2050 which today has a population of 50,000.
8. Population growth in Cumberland County is not just occurring on its own. Retirees are actively recruited and courted to move to Cumberland County by developers with the support of local government. Our community is sold to retirees for its high quality of life and its affordability.
9. Developers are attracted to Cumberland County because of its lack of any land management beyond compliance with subdivision regulations. Despite the County's 2000 Growth Plan, the County has not exercised its stated duty to manage and control urban growth while taking into account the impact to agricultural lands and forests. The County has not acted to preserve rural areas for farms, forests, recreation, and wildlife management.
10. The degradation of our watershed and the erosion of our quality of life due to unlimited, unplanned, and unmanaged growth are the major impacts of a water supply project to meet the needs of a population beyond the carrying capacity of our watershed.
11. At this time the Obed Watershed Community Assn. formally requests a review and public hearing on the Detailed Needs Assessment for a water supply project and requests the Detailed Needs Assessment includes an analysis of how different growth scenarios would impact our community social, cultural, economic, and environmental conditions. OWCA suggests that a sustainable development growth scenario be included in the needs assessment study.
12. The Cumberland Plateau has been recognized as a global biogem for its high species diversity, a reflection of its remaining forests and intact habitats of its undeveloped land. What is the real value of these undeveloped lands to our community and region? While our economy does not presently account for watershed services, there are emerging efforts to affix a monetary value to the

services a healthy watershed provides: clean water, clean air, cleansing of wastes, pest control, pollination, species diversity, cycling of nutrients, recreation, natural beauty, spiritual retreat, and scientific curiosity. An ever increasing conversion of forest to development has a real cost that the Corps can fix a value.

13. Growth induced development within the County has already deforested large areas. The environmental effects upon the watershed are cumulative, the impacts accumulating one subdivision at a time, one impoundment at a time, one five-acre lot at a time. Five major impacts of deforestation are loss of habitat, threats to Endangered and Threatened species, nonpoint pollution, increased imperviousness of the land surface, and degraded water quality.

- **Loss of habitat** occurs when the environmental and ecological conditions necessary for the survival of a species are destroyed. Chainsaws and bulldozers can destroy in an afternoon a natural community which has taken millions of years to evolve.
- **Endangered and threatened species** within the Obed River Watershed are our responsibility to ensure that their habitats are not destroyed by land clearing or stream sedimentation.
- **Nonpoint pollution** is the primary cause of stream impairment in our county. Sedimentation of streams destroys the critical habitat for aquatic life and threatens the water quality of the Obed River and its tributaries, streams that have been designated as Outstanding Water Resources by the State of TN. On the Cumberland Plateau, soil lies thinly on the sandstone caprock. Losing that precious soil to unregulated land development is a further degradation to the quality of our life in Cumberland County.
- **Imperviousness surfaces** increase storm water degradation of our streams and soil erosion.
- **Degraded water quality** is a result of unregulated deforestation and construction. Sedimentation, higher water temperatures from the loss of canopy, and changes in the base flow drastically alter the critical habitat of most aquatic species.

14. Housing developments have already converted many acres of farmland into subdivisions. Many farmers are finding it increasingly difficult to afford their farms due to the property taxes on increased assessments. While farming as a family enterprise was in deep economic trouble before the recent growth in development, the development trend has only hastened the demise of the remaining farms. Farmland converted to residential development is subject to similar losses experienced by deforested land: increased soil erosion, increased imperviousness, increased sedimentation of streams, and degraded water quality.

15. Another victim of the rapid growth and land development is the loss of our community's cultural heritage. Our community's rural nature has been eroded and is being replaced with a suburban culture. Unlike our surrounding neighbors, our county has not been inventoried by archaeologists to identify and catalog sites that point to our community's unique history. Bulldozers tear down reminders of our history that should have been at least recognized and respected for what they were.

17. Retirees are attracted to Cumberland County in large part because of its natural beauty. One person said, "It's like living in a park." Its natural beauty, the open landscape, its viewsheds, and small town culture attract people here. If we consume that asset in continuous unregulated and unmanaged development, the place where we live will have suffered so much damage that its natural beauty will only be nostalgically remembered through photographs.

18. Another impact of population growth is increasing the vulnerability of our community's economy. The present engine of our local economy is providing housing and services for retirees. We as a community have to understand the danger of putting such a large community investment into this economic bubble. Besides the external effects of the national financial and housing markets, our community's present dependence on such a self-limiting economy is short-sighted.

- Other communities surrounding us have learned from the success of development in Cumberland County and are now competing with us to attract retirees. New developments around the TVA lakes and within the Upper Cumberlands will now recruit the same demographics that Cumberland County developers have.
- Development will move away from Cumberland County once it is "built-out." People are attracted to the novel and new. Cumberland County, while serving as a model how to attract retirees, may be left in the dust of the competitive market.
- A local economy based on building home for retirees is self-limiting. It will lose its impetus within 10-15 years once the demographic bulge passes.
- Currently we are a bedroom community with an economic focus of building more bedrooms. After that economic activity subsides, we will be a bedroom community without an economic driver. Once development plateaus or passes over Cumberland County, what kind of economy will we have in a community that has squandered its natural resources and degraded its water quality?

19. Our County's natural resources, high quality of living, healthy watersheds, and beauty will in the long term offer greater economic long term benefits than the current slicing and dicing of undeveloped lands for a quick profit.

20. Unlimited growth and even median growth will so change this community that it will be unrecognizable to those who live here now. People live here because they like it the way it is. The decision to alter our community beyond recognition should be a community decision, not just made by those who have been appointed to sit on the Cumberland Regional Water Authority.

21. The community to date has not voiced its desire for unlimited or even median growth. The Three-Star community economic development needs assessment process earlier this year set as its priority improving the retention and expansion of existing firms, not a water supply to guarantee continuing growth. We the community live here and should have the right, if not the vote, to determine whether we want to multiply our population in an unregulated manner and degrade our quality of life or to keep our quality of life while we continue to grow in a sustainable manner.

22. The wallet-costs of development upon residents are many:

- Increasing land prices has made it increasingly unaffordable for many of the younger generations of established families to live here.
- Land values have increased dramatically, putting home ownership and even land ownership out of the reach of many local residents.
- Farmers are under tremendous pressure to sell their land and take advantage of the high land prices.
- The increasing valuation of land means higher property taxes for everyone, not just for those yet to come, but everyone.
- As municipalities grow and alter land use, the capacity to provide sufficient water to meet the needs of consumers within the watershed must be determined. These water withdrawals and potential losses from the watershed's water resources may adversely affect the stream's water quality and water availability. Impaired water quality

resulting from reduced stream flow and point and nonpoint pollutant sources may increase water treatment costs. Increased capital and operational costs may affect a community's ability to provide safe drinking water to its citizens, as well as its ability to sustain economic growth.

23. Recent studies, without exception, show that residential development costs local governments more money in terms of added services (schools, police, sewer, and the like) than development provides the local government in property taxes.

24. Unless the community can be shown how we will benefit from having twice, or five times, or 15 times the number of people living here than are here today, the question arises why should we have to pay for something we don't want and will degrade our quality of life? Why should we subsidize developers in their race to consume all the developable land in our county? They will keep all the profits for themselves and leave the increased infrastructure costs to the tax payers.

25. The community has benefited from the population growth. Those who have moved here have added their talents to benefit the community, have encouraged the expansion and improvement of health care and cultural amenities, and have increased our diversity. Yet, unless we have a sustainable development plan to protect what the community values – its natural beauty, its natural resources, its cultural heritage, its affordability, and its high quality of life - we cannot afford more growth. A comprehensive watershed approach is needed in order to assess adverse impacts of landuse actions on water quality and water supply. This approach would also permit a more accurate assessment of downstream impacts of these actions on streams and the impact on the communities and other users who rely upon them.

26. Sustainable development meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable development improves the quality of life while living within the carrying capacity of the supporting environment. We can continue to grow through sustainable development. OWCA encourages the community to protect and enhance what we value through sustainable development planning. People everywhere are totally dependent on the natural environment for our survival, and it is in our community's best interest to promote the natural health and well being of our watersheds.

27. Only until the community develops our own vision for our future growth can water supply options be determined. We may find that we already have all the water we need within our community without further degrading our natural resources and the integrity of our watershed.

28. Cumberland County can use a limited water supply to preserve what we value – the special character of our community, the natural beauty of the watershed, our excellent water, and high quality of life. By limiting further development of our watershed to development practices that will sustain it, we can continue to live in the park we call home and welcome those who choose to live with us.

The Obed Community Association has as its purpose community appreciation and volunteer involvement in ongoing research of the natural and cultural heritage of the Obed River watershed within Cumberland County. Louise Gorenflo, OWCA director, produced this fact sheet. Those wanting to join this membership organization or more information may contact OWCA at 484-2633 or at 185 Hood Drive, Crossville, TN 38555.