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Chevales Williams
NEPA Specialist
Tennessee Valley Authority

Dear Ms. Williams,

Thank you for the opportunity to provide comments on TVA's Draft Environmental Impact Statement for the Kingston Fossil Plant retirement. I am a Knoxville, Tennessee resident and field coordinator with Appalachian Voices. I work with communities impacted by the gas plant and pipeline that TVA is proposing as a replacement for the Kingston plant. I also support the advocacy of Kingston coal ash cleanup workers and their families. In my comments, I raise two questions about critical information that was missing from TVA's DEIS.

1. Why was the 2008 Kingston Coal Ash Spill nearly absent from TVA's DEIS?

The biggest industrial spill in U.S. history took place in the community where TVA is proposing a new gas plant. In 2008, a dike containing coal ash from the Kingston Fossil Plant ruptured, releasing over one billion gallons of toxic coal ash slurry into surrounding neighborhoods and waterways.ⁱ Hundreds of cleanup workers – who were denied personal protective equipment by TVA's contractor – have come forward with serious illnesses, and at least 60 have died.ⁱⁱ TVA also bought and tore down impacted homes in Harriman, eventually replacing a neighborhood with a park.ⁱⁱⁱ

TVA's preferred alternative, a new CC/Aero CT gas plant, would be located on the existing Kingston reservation. Its impacts, which include the release of over 1.7 million tons of air pollutants annually,^{iv} would affect the same communities that endured the coal ash spill. In comparison, TVA's solar and storage alternative would release zero air emissions.

In a DEIS that was prepared to "evaluate the environmental and social effects"^v of the Kingston Plant retirement and replacement options, it is bewildering that the spill and its impacts would not be considered. TVA's only direct mention of "a coal ash spill in 2008" references decreased power production from that point going forward.^{vi} Elsewhere, TVA refers to buying more land in 2008, but does not describe why.^{vii}



Workers died because of the spill, and a neighborhood was displaced. Any decision about the future of the plant site must recognize this disaster. I urge TVA to address the coal ash spill's omission from the DEIS publicly, and to consider its impacts in the Final Environmental Impact Statement.

2. Why did TVA exclude long-term job estimates for Alternatives A and B, as well as temporary job estimates for Alternative B?

Many Roane County residents I've spoken with have not been informed that the proposed gas plant would employ less workers than the coal plant. In the DEIS, while TVA recognizes their preferred gas plant alternative would result in job loss, they left out important details that have significant implications for area residents.

The exclusion of long-term job estimates in the preferred alternative was surprising, because TVA included this information in both the Draft and Final Environmental Impact Statements for the Cumberland Fossil Plant retirement.^{viii} For Cumberland, TVA estimated the new 1,450 MW CC gas plant would permanently employ 25 to 35 workers. The gas plant proposed for Kingston would have a similar generating capacity of at least 1,500 MW. Is the Kingston gas plant expected to employ a similar number of permanent workers? Why haven't estimates been shared with residents?

Right now, TVA states that the Kingston Fossil Plant directly employs 200 workers.^{ix} TVA says that they will offset job loss by helping workers relocate for open positions in their service area. But how many Kingston plant workers does TVA expect will relocate? And to address local economic impacts, will TVA work with Roane County to attract new businesses or organizations that can provide high-paying, long-term jobs at the former plant site?

The DEIS also failed to offer estimates for short- or long-term employment from Alternative B, the solar and battery storage option. In a 2022 analysis, Appalachian Voices found that clean energy replacements for the Cumberland plant would create 20 to 30 times more long-term jobs than TVA's gas option.^x By excluding clean energy job estimates from the Kingston DEIS, TVA obscures its great economic potential for the region.

After nearly 70 years of coal plant pollution and the devastating 2008 coal ash spill, Roane County deserves to be supported in TVA's transition from coal. I ask that TVA provide long-term job estimates for

Alternatives A and B, as well as temporary job estimates for Alternative B, as soon as possible. I also request that TVA addresses these questions in its Final Environmental Impact Statement for the plant retirement.

Sincerely,



Gabi Lichtenstein
Tennessee Energy Democracy Field Coordinator
Appalachian Voices

ⁱ Gaffney, A. (2020, December 15). A Legacy of Contamination: How the Kingston coal ash spill unearthed a nuclear nightmare. *Grist*. <https://grist.org/justice/tva-kingston-coal-ash-spill-nuclear/>.

ⁱⁱ Satterfield, J. (2023, May 23). Workers forced to clean up TVA coal ash spill without personal protection settle with company. *Kentucky Lantern*. <https://kentuckylantern.com/2023/05/23/workers-forced-to-clean-up-tva-coal-ash-spill-without-personal-protection-settle-with-company/>; Remember Kingston. (2023). <https://rememberkingston.wordpress.com/>.

ⁱⁱⁱ Matheny, J., & Robinson, G. (2018, December 22). Historic Disaster: 10 years after the ash spill. *WBIR*. <https://www.wbir.com/article/news/historic-disaster-10-years-after-the-ash-spill/51-3125fb4d-93bc-4dd8-9ce1-63a449fa6ff9>.

^{iv} Tennessee Valley Authority. (2023). *Kingston Fossil Plant Retirement DEIS*, 361.

^v Ibid, i.

^{vi} Ibid, 363.

^{vii} Ibid, iv, 1.

^{viii} Tennessee Valley Authority. (2022). *Cumberland Fossil Plant Retirement DEIS*, 388; Tennessee Valley Authority. (2022). *Cumberland Fossil Plant Retirement FEIS*, 518.

^{ix} Tennessee Valley Authority. (2023). *Kingston Fossil Plant Retirement DEIS*, xxiv.

^x Knisley, B., Luke, N., McIlmoil, R., & Barrett, J. (2022). *Save Energy, Grow Jobs in the Tennessee Valley: How investments in renewable and efficient resources could bring thousands of jobs to the TVA region*. https://appvoices.org/resources/reports/TVA_Jobs_Report_07_14_22.pdf