



Freshwater Mollusk Conservation Society
1417 Hoff Industrial Dr.
O'Fallon, MO 63366

December 18, 2012

Ms. Anda A. Ray
400 W. Summit Hill Drive, WT-11C
Knoxville, TN 37902-1401

Dear Ms. Ray;

The Cumberland River Aquatic Center (CRAC) on the Tennessee Valley Authority (TVA) Gallatin Fossil Plant property is proposed for closure in the near future. This facility has actively contributed to the restoration and culture of native freshwater mussels over the past decade. The facility has proven particularly successful growing the federally endangered pink mucket (*Lampsilis abrupta*) to sizes suitable for stocking. However, the power plant plans to construct new air emission scrubbers and the preferred alternative uses the existing mussel and fish culture facility footprint. The environmental assessment (EA) developed for TVA identifies other location options for the scrubber construction, but TVA has informed Tennessee Wildlife Resources Agency (TWRA) that the culture facility will likely be affected.

This facility was restored and constructed through cooperative funding and efforts by TWRA, U.S. Army Corps of Engineers (COE) and TVA pursuant to a U.S. Fish & Wildlife Service (FWS) consultation. These resources cannot be duplicated elsewhere because volunteer labor contributed by TVA and TWRA employees was necessary to achieve the current facility status. Operational costs remain low with available maintenance assistance from the TVA plant staff and efficiencies of coexistence on a constantly staffed power plant property. Source water characteristics, ample water supply, contributed electricity, low operational costs, and proximity to natural distributions of rare mussel and fish species have made this facility instrumental in conservation and research work for the Cumberland and Tennessee River basins. These factors in proven facility success may not be duplicated at a new location.

Approximately \$330,000 has been spent on this facility to date. The cost of recreating the infrastructure in another location would be approximately \$1,000,000. This amount exceeds TWRA capacity and would reduce available resources for actual rearing and culture of rare fish and mussel species for conservation purposes. Biologists with TWRA, FWS and TVA argue that continued facility operation is beneficial and important to imperiled aquatic species conservation efforts in the highly biodiverse Tennessee River and Cumberland River regions.

Therefore, the Freshwater Mollusk Conservation Society supports the continued operation of the CRAC. We encourage all partner organizations, especially TVA and TWRA to continue, and even increase, support of the facility and the conservation aquaculture work conducted there. Loss of this facility would be detrimental to species restoration efforts across the region.

Sincerely,

Dr. Caryn Vaughn, President
Freshwater Mollusk Conservation Society

Cc: Mary Jennings, FWS Tennessee Field Office, 446 Neal Street, Cookeville, TN 38501