

## **Writing to the Dept. of Energy to Comment on the Proposed Motorsports Park (Racetrack)**

This information will assist you in sending comments to the Department of Energy (DOE) who set the original restrictions on the use of the land now to be included in the Motorsports Park. Because this is about a government document, it is filled with acronyms. I have tried to spell out the key ones here.

The DOE seemingly wants to narrow its focus and involvement in this issue as much as possible. It may get messy and presumably they would like to avoid as much of that as they can. For that reason, they are likely to consider comments that focus almost entirely on the effect of the project on the environment. It's their one foot stuck in the mud over this. The "environment" includes a lot of things and among those is noise which their work discusses, but expect somewhat of a deaf ear to that single complaint. To effectively lobby the DOE against lifting its restrictions, anyone who commenting on the current Environmental Assessment should also focus on the impacts to the:

- Natural areas (beech/maple grove),
- Riparian (stream) corridor on the east end,
- Noise impacts to the BORCE and surrounding areas (flora and fauna),
- Recreational use of the BORCE,
- Value of the BORCE as settlement under the Natural Resource Damage Assessment Act.

The DOE transferred its land to the Community Reuse Organization of East Tennessee (CROET) in 1996. Because of the adverse impact of shutting down its operations in Oak Ridge, the land was identified to be used for industrial development as a means of assisting the Oak Ridge community. It included certain Natural Areas (NA) to be protected because of their unique nature and to avoid the necessity of doing a full blown environmental impact study for the land transfer. The Natural Areas were mapped out as "mitigating" actions to enable the land transfer (keep this in mind). The marketing and sale of that land was taken over by the Industrial Development Board. The IDB is independent of the City of Oak Ridge, but its members are appointed by City Council. The City itself has never owned the land in question.

The land involved is in the Horizon Center Business / Industrial Park. Wrapped around the Business Park is a large tract of land called the Black Oak Ridge Conservation Easement (BORCE). It is wooded with trails that run around its perimeter and cross through it at several points. Anything done to the land in question will in some way affect the BORCE. Also, not far from the site of the proposed racetrack are residential subdivisions including Westwood, Southwood, Heartland Estates, and Forest Creek Village. Noise and activity at the racetrack have the potential to adversely affect those residential areas (e.g., O.R. Turnpike traffic).

In early 2020, a developer, Mr. H. E. Bittle, proposed to the city constructing a Motorsports Park on an undeveloped 320 acre section of the Horizon Center Business / Industrial park. The Industrial Development Board (IDB) then asked the DOE to review the 1996 Environmental Assessment (EA)/2003 EA Addendum (EAA). The reason for the review was to provide advice on removing the restrictions on some of the Natural Areas that separated several of the Development Areas (DA). The areas were to be protected from development due to their inherent ecological value or rarity.

The original 1996 EA, and 2003 follow-up EA, resulted in a “mitigated Finding of No Significant Impact” or “mitigated FONSI.” The recent review produced another “mitigated FONSI,” but removed the original mitigation protections for several natural areas as no longer necessary. DOE issues a “mitigated” FONSI when it recognizes that a proposed action will have significant environmental or socioenvironmental impacts, but that these impacts can be mitigated by requiring certain actions. The new mitigations are essentially recommendations to prevent damage to the environment during racetrack construction.

The currently proposed Environmental Assessment Addendum (EAA) & FONSI ignore the earlier rationale for mitigation. Instead, this new EAA proposes mitigations that have no actionable (by contract) or physical attributes, i.e., the Natural Areas are destroyed. The original transfer had legal protections for breaching the Natural Areas. The bottom line is that several of the protected areas are no longer protected and nothing bad will happen because of that change. So what was considered to be a problem in the past, is now no longer a problem. Poof! Why? Because saying so makes it possible for the developer to do his project and that is a good thing because it utilizes undeveloped land.

There are numerous other ways to use the land that do not require removing the natural areas. This one project is unique in making this demand and also generating noise. It is not true that a lack of connectivity between the development areas has caused the land not to be developed. The primary reason is a lack of a suitable building for a new company to occupy.

The potential damage to the BORCE caused by the racetrack may encourage EPA/TDEC/TWRA to reopen and revise the Natural Resources Defense Act settlement. Setting aside the BORCE was another way for the government to assist the Oak Ridge community in consideration for its past actions. Furthermore, the difference in land use between the earlier EA/EAA and this EAA would normally be sufficient to require an entirely new Environmental Assessment or even a complete Environmental Impact Statement. A full Env. Impact Statement could require DOE to reclaim ownership of the land. That would be a huge delay for the developer.

Email the DOE. [Katatra.Vasquez@science.doe.gov](mailto:Katatra.Vasquez@science.doe.gov)

View the entire recent study at:

Resource: ED-1 EA Addendum DOE/EA-1113-A2 Environmental Assessment Addendum (132 pages): <https://doeic.science.energy.gov/uploads/A.0100.037.2683.pdf>

BORCE – Black Oak Ridge Conservation Easement  
DOE – US Dept. of Energy  
EA – Environmental Assessment  
EAA – EA Addendum  
FONSI – Finding of no significant impact  
EIS – Environmental Impact Statement  
EPA – Environmental Protection Agency  
NARDA - Natural Resource Damages Assessment Act  
TDEC – TN Dept. of Environment & Conservation  
TWRA – TN Wildlife Resources Agency  
IND-2 – Industrial 2 zoning category