

NORTHWEST TENNESSEE  
REGIONAL PORT  
&  
INDUSTRIAL PARK

REVISED  
REQUEST FOR CERTIFICATE OF  
PUBLIC PURPOSE AND NECESSITY

Sept. 29, 2006

## Executive Summary

The Northwest Tennessee Regional Port Authority was created pursuant to Tenn. Code Ann. §§ 7-87-101 et. seq. by the three sponsoring counties, Lake, Dyer and Obion for the purpose of constructing and operating a Mississippi River Port at Cates Landing, Northern Lake County, Tennessee. Integral to the success of the River Port is the development of an Industrial Park. Preliminary feasibility studies, including engineering, commercial/economic impact and environmental, have been completed and conclude that a Mississippi River Port together with the proposed Industrial Park is a viable, well conceived public project.

The following executive summary is designed to acquaint the members of the Building Finance Committee of the Tennessee Board for Economic Growth, with the overall scope of the Project, as well as, summarizing the conclusions of the engineering, commercial/economic impact and environmental studies in support of Lake County's application for a Certificate of Public Purpose and Necessity regarding the development of the Industrial Park portion of the Port Project.

### Background:

For several years federal, state and local community, business and governmental leaders/officials have been examining the development of a Mississippi River Port and Industrial Park in Northern Lake County, Tennessee. Because of topography, Cates Landing, which is located approximately 4 miles North of Tiptonville, Tennessee, is the only location on the Eastern Bank of Mississippi River, between Memphis Tennessee and Cairo Illinois that is above the 100 year flood plain. As a result of a bend in the Mississippi River an optimum slack water harbor is created naturally due to the River's own hydraulics.

The Proposed Northwest Tennessee Port will be an intermodal facility and Industrial Park Complex designed to exploit the unique geography and the existing river, rail and highway transportation assets already in place. The River Port will be comprised of a River Terminal and will eventually include a cross-dock, and trans-load facility which will be designed to handle Barge to Rail, Barge to Truck and Truck to Rail Intermodal Connections. The Industrial Park will be comprised of the adjacent 350 acres of flat lands north of the City of Tiptonville. The optimum use envisioned for the Park is one which would exploit the River, the relative proximity of I-55, I-40 and I-24, as well as, the planned I-69 corridor, and the main line of the Canadian National Railway.

### Engineering:

The engineering studies conducted by U.S. Army Corps of Engineers have concluded that the Port is viable from an engineering standpoint. The unique elevation of the site and its flat topography and natural drainage features make the site the ideal for development as a port facility.

### Economic:

Studies conducted by Younger Associates concluded that the probable economic impact on Dyer, Lake and Obion Counties in Tennessee from the construction of a port and the development of a industrial park would result in the creation of 3,000 new jobs directly, and would result in the creation of another 2,604 jobs indirectly for a total of 5,604 jobs. Wages and benefits paid to these new jobs would generate approximately 209.4 Million Dollars annually and more than 4 Million Dollars in new local annual tax revenues. New capital investments in the industrial park at an estimated 100 Million Dollars, would create a one time- economic impact of \$558,173 in new local tax revenues during the construction and start-up periods. The resulting economic impact in Lake County and Northwest Tennessee would off-set the debt incurred in the acquisition and construction phases.

Furthermore economic studies preformed by the U.S. Army Corps of Engineers concluded that even if no additional industries located with the three (3) county area, the Benefit/Cost Ratio for transportation savings as it relates to existing industries, would be 1.89 to 1. In terms of real dollars, an approximate \$1,179,033.00 per year savings would be realized. Accordingly the transportation savings alone makes the Port project viable economically.

### Environmental:

The U.S. Army Corps of Engineers extensively studied the impact of the port on the environment and concluded there was no significant impact to wildlife, aquatic resources, cultural resources, endangered or threatened species, vegetation, flood-plain management, wetlands, recreation, air quality, water quality or prime and unique farmlands. There were no direct impacts on human health or the environment.

### Phases:

There are four (4) real estate components or phases which will comprise the Port and Industrial Park development: (1) the "wet" harbor, consisting of 9,000 X 130 foot dredged channel with 300 foot turn areas; (2) dredged material disposal areas and

mitigation lands, (3) the River Terminal; and (4) the Industrial Park Complex adjacent to the River Terminal. Each are discussed below:

(1) The Wet Harbor facility. The Wet Harbor facility is the “hole in the river bed” which would allow barges and other river traffic to dock without running aground. The river bed will be removed from a 9,000 by 130 foot channel in the river with 300 foot turning radius for tug traffic. On September 30, 2005, the Northwest Tennessee Regional Port Authority and the U.S. Army Corps of Engineers executed a Project Cooperation Agreement for the construction of the wet harbor. As the subject property is located within the navigational servitude of the Mississippi River, there is no acquisition cost associated with obtaining this land.

(2) The Dredged Material Facility: It is estimated that over the life of the Port, 240 acres of land will be necessary to hold the material dredged from the river, in an environmentally acceptable manner. Approximately 84 acres will be located on the river side of the Madrid Bend Levee, which helps to further protect this area from flooding. Dredged material will be used by the Corps to help strengthen and improve this Levee. The remaining 156 acres are located on the other side of the levee.

As a result of the development of the Dredged Material Facility, 169 acres of mitigation lands are required to be obtained and restored/transformed into a natural wetlands habitat. To satisfy this requirement the Port Authority has identified with the approvals of both the U.S. Army Corps of Engineers and the Tennessee Department of Environment and Conservation, a farm in western Obion County, north of Webb Store Road and further known as a portion of Map 88, Parcel 1 in the Tax Assessor’s Office for Obion County, Tennessee. The Port Authority is actively engaged in on-going negotiations to purchase this property.

According to Federal Law, land for the Dredged Material Facility, other than the Mitigation lands, is considered a part of the navigation features of the Wet Harbor, and is authorized to be acquired through Federal powers of eminent domain. The Project Cooperation Agreement, however, provides that the Port Authority will bear the acquisition costs of the lands. The Port Authority plans to issue general revenue bonds, pursuant to Tennessee Code Annotated §§ 7-87-101 et. seq. for the purpose of financing portions of the land and development costs. As a condition to the issuance of these Bonds, the Counties of Lake, Dyer and Obion have committed by Resolution to guarantee the indebtedness of the Port Authority, 50% by Lake County, and 25% by each of Dyer and Obion. Under State Law, no separate Certificate of Public Purpose is required by any of the Port Authority or the Counties of Lake, Dyer or Obion in connection with the issuance and guarantee of the Port Authority’s revenue bonds.

(3) The River Terminal: Located at the southeastern end of the Wet Harbor Facility, the River Terminal will be developed as an Inter-modal Transportation handling facility with Barge, Truck and Rail capabilities. This 150 acre site will be comprised of 50 acres donated to the Port Authority by the Industrial Board of Lake County and an additional 100 acres to be acquired by Lake County.

The River Terminal does not qualify as a navigational feature under Federal Law and may not be acquired by Federal powers of eminent domain. The Port Authority lacks the statutory power of eminent domain in its own right. Lake County therefore is the logical and willing candidate to acquire this 100 acres pursuant to its power of eminent domain. To fund the costs of these acquisitions, Lake County will issue general obligation bonds pursuant to the Certificate of Public Purpose and Necessity being sought herein. The Costs to acquire this acreage is estimated to be at least \$290,790.00 based upon the average of two independent appraisals of the fair market values. The remaining costs of the structures and improvements to be built at the River Terminal will be funded from the several State and Federal agencies detailed below, and the balance of the bond proceeds.

(4) Industrial Park: The adjacent Industrial Park will be comprised of 350 acres, initially. However, with more than 2,000 acres surrounding lands being undeveloped farm land, the location is ideal for further expansion as the need arises.

As with the River Terminal, Lake County will acquire the initial 350 acres by the exercise of eminent domain in the event that voluntary sales cannot be negotiated. Land acquisition costs are estimated to be \$822,475.00 based on the average of two independent appraisals of the fair market values. Additional monies generated through the sale of General Obligation Bonds will help fund the development costs of the Industrial Park. As a condition precedent to the issuance of these Bonds, a Certificate of Public Necessity is required.

#### Summary:

As an inducement to the Port Authority for the development of the Port as Industrial Park Complex within its geographical boundaries, Lake County has committed to acquire the approximately 450 acres not acquired by the Corps of Engineers and to donate the same to the Port Authority for development into the Port/Industrial Park campus. Lake County has also committed to fund the cost of such acquisition and development, in the amount of \$2.75 Million of General Obligation Bonds. The following application for Certificate of Public Necessity is respectfully submitted to the Building Finance Committee in order to provide such bond funding.

APPLICATION FOR CERTIFICATE OF  
PUBLIC PURPOSE AND NECESSITY

Lake County, Tennessee

The following constitutes the application of Lake County, Tennessee for a Certificate of Public Purpose and Necessity through the Building Finance Committee of the Tennessee Board For Economic Growth for the acquisition and development of portions of the River Terminal and Industrial Park Complex located at Cates Landing, in Northern Lake County. This Application lists the information required by the Committee and summarizes the response and data comprising such information.

*(a) There shall be a letter addressed to the Building Finance Committee from the chief officer of the municipality, bearing the signature of such official and including the following:*

- 1. a statement requesting that the Building Finance Committee issue to the municipality a Certificate,*
- 2. a statement outlining the scope of the project for which the Certificate is sought and the reasons for undertaking,*
- 3. a statement as to the aggregate cost of the project, sources and amounts of funding available for implementation of the project and the sources and amounts of anticipated revenues to be derived from the project, and*
- 4. a statement as to the aggregate amount of General Obligation bonds the municipality is seeking authority to issue to finance the project.*

Response: Attached in Tab A is correspondence from Macie Roberson, Lake County Executive Officer, outlining the above requested information. The scope of the project for which the Certificate is sought is also described in the Executive Summary contained hereinabove and in Tab A.

There are four (4) required land acquisitions. The first acquisition involves 250 acres to be acquired through the Corps of Engineers and financed by the Port Authority through the issuance of Port Authority Revenue Bonds. The second acquisition involves 100 acres which will make up most of the River Terminal facilities and the third acquisition involves the 350 acres for the adjacent Industrial Park facilities which will be acquired by Lake County. The fourth acquisition is the 169 acres of mitigation lands which will be

acquired by the Port Authority through a voluntary sale. Current estimates place the total land acquisition costs for all four tracts at \$2,118,865.00.

Regarding the total Port Project, the latest cost projections, detailed in Tab C, estimate the total cost of the Project will be \$21,943,400 including all harbor and industrial park facilities together with all necessary infrastructure improvements and extensions. Lake County has committed to funding approximately \$2,750,000.00 of these costs through the issuance of General Obligation Bonds. The balance will be generated from the Federal, State and Local grants and loans, and Port Authority Revenue Bonds detailed below:

U.S. Department of Commerce,	
Economic Development Administration . . . . .	\$2,000,000.00
Tennessee Valley Authority . . . . .	\$200,000.00
U.S. Department of Agriculture,	
Rural Economic Development Administration . . . . .	\$240,000.00
Tennessee Department of Transportation . . . . .	\$5,538,000.00
State of Tennessee, Special Appropriation . . . . .	\$2,505,000.00
Tennessee Department of Economic	
and Community Development . . . . .	\$904,600.00
Gibson County Electric - Low Interest Loan	
and construction of infrastructure improvements. . . . .	\$1,719,940.00
Delta Regional Development Authority . . . . .	\$339,060.00
Lake County General Revenue Bonds . . . . .	\$2,750,000.00
N.W. Tennessee Regional Port Authority	
Revenue Bonds . . . . .	\$2,200,000.00
N.W. Tennessee Regional Port Authority	
Sponsor Donations . . . . .	\$363,000.00
	Total . . . . .
	\$18,759,600.00
U.S. Army Corps of Engineers Funding	
Harbor Construction . . . . .	\$3,183,800.00
	Total Expenditures . . . . .
	\$21,943,400.00

A copy of the Project Cooperation Agreement detailing the obligations of the U.S. Army Corps of Engineers Funding is attached as Exhibit L.

*(b) Certified copies of all necessary and required resolutions and/or ordinances enacted or passed by the governing body of the municipality empowering it to undertake the project and make application to the Committee for a Certificate.*

Response: Attached as Tab B are the resolutions enacted by the governing bodies of Lake, Dyer and Obion Counties authorizing this Project in general and the securing of this Certificate of Public Purpose and Necessity.

Although not specifically requested in the Application Process, recent amendments to Tenn.Code Ann. § 13-16-207, require that certain preliminary steps be accomplished prior to the issuance of the Certificate to-wit:

- (a) A city or county may exercise the power of eminent domain for development of an industrial park only with respect to property located within the jurisdictional boundaries of the city or county; or in the case of a city, also with respect to property within an urban growth boundary as defined in § 6-58-101, or in the case of a county, also with respect to property within an urban growth boundary or planned growth area as defined in § 6-58-101. Either a city or town and county, or both, operating a joint industrial park may exercise the power of eminent domain with respect to property located within the jurisdictional boundaries of the county and within an urban growth boundary and a planned growth area.

Response: Attached hereto as Attachment N(1) is a copy of the North Part County Growth Plan, Lake County, Tennessee. The proposed Port Site being located in the Tiptonville Expanded Urban Growth Boundary.

- (b) Before a city or county may undertake to exercise the power of eminent domain for development of an industrial park, it must obtain a certificate of public purpose and necessity as provided in subsection (a) even if no funds will be borrowed for the project except:

- (1) The requirements of subdivision (a)(1)(A)(iv) are not applicable to a certificate of public purpose and necessity obtained solely for the exercise of eminent domain authority;

- (2) A certificate of public purpose and necessity for the exercise of eminent domain, in addition to the applicable findings set forth in subdivision (a)(1)(A), shall be based on a finding that the city or county has been unable to acquire through good faith negotiations that property to be acquired by eminent domain or any alternative property that would be comparable suitability for the project. Good faith negotiations shall be established if the city or county has made an offer to purchase the property for an amount equal to or in excess of the fair market value determined by the average of at least two (2) appraisals by independent, qualified appraisers.

Response: The County concedes that a Certificate of Public Purpose and Necessity for the development of the Port and Industrial Park is required, as the County intends to borrow monies.

Attached hereto as Exhibit N(2) are Offers to purchase the subject properties for the average of two (2) appraisals conducted on each tract and responses received to date. Copies of the appraisals are attached hereto as Exhibit M(1). The county submits that no alternative property that would be of comparable suitability is available for the project. Correspondence from Jim Lloyd of the United States Army Corps of Engineers is attached as Exhibit N(3), and is summarized as follows:

The Northwest Tennessee Regional Harbor Project is the product of seven (7) years of work by the Port Authority, project supporters and the U.S. Army Corps of Engineers. The study evaluated five different sites and six alternative configurations for the chosen site. Alternative 5 was chosen because it is a very well designed project which yielded an optimum engineering design with minimal environmental impacts. Any deviation from using the specific site agreed upon between the Corps and the Port Authority would represent a potential substantial threat to the environmental assessment and the mutli-agency funding now in place as well as the timing of the project as a whole.

*(c) An Expenditure vs. Funding Statement, such statement to contain, on a single page where possible, an itemized statement of all project expenditures tabulated in a single column on the left hand side or such page and an itemized statement of all funding for the project tabulated in a single column on the right hand side of such page. Each such column shall be totaled and the total amounts of each column shall equal one another.*

*1. Costs shall include all expenses to be incurred in undertaking the project including, but not limited to, land cost, construction cost, cost of the services of architects and engineers, legal and fiscal expenses and shall include interest accruing during the construction period and for six (6) months thereafter on money borrowed in conjunction with the project for which the petition is filed.*

*2. Funds shall include all grants and/or loans from governmental agencies as well as monies to be derived from the sale of bonds, or to be borrowed from commercial institutions, or to be contributed form the general fund or any special fund of such municipality.*

3. *There shall be included in the appendix to the application with references to cost, the following:*

*(i) where fees or costs have been established by option, actual payment, invoice or contract, a copy of the document establishing the basis for the cost or fee.*

*(ii) where fees or costs have been established by estimate, the sources of the estimate and sufficient additional information concerning the estimate to establish that the party making the estimate is will qualified and has sufficient experience and knowledge with respect to the subject to estimate as to make the estimate reliable, and;*

*(iii) in the case of land cost, there shall be provided, in addition to any option or contract establishing the purchase price, an independent appraisal of the property by a qualified real property appraiser.*

Response: Attached as Tab C (1) is the Expenditure vs. Funding Statement and supporting documents prepared for the Project. This statement includes all costs outlined above, and the funds from all known sources which have been committed to the Project.

The costs of developing the project are Attached as Tab C (2) Site Development Costs and Features as developed by United States Army Corps of Engineers and Forcum Lannom Contractors LLC:

Road Improvements Extensions	\$1,875,000.00
Railroad	\$5,060,000.00
Utilities	\$70,000.00
General Purpose Terminal Structures	\$6,450,000.00

Land costs estimates and estimated architects, engineers, and legal fees and fiscal expenses are as follows:

Land Costs	\$1,113,265.00
(a. Land Purchase River Terminal \$290,790.00)	
(b. Land Purchase Industrial Park \$822,475.00)	

Pre-Plan & Studies (Preliminary Costs 1999-2003)	\$363,000.00
Master Planing & Pre-Plan Design	\$159,000.00
Legal Expenses	\$35,000.00
Administrative Expenses	\$55,000.00

Included in the Expenditure vs Funding Matrix are the following costs and expenses associated with the Project which are not covered by the Certificate of Public Purpose.

Local Share of Harbor Cost	\$1,477,900.00
Land Purchase Dredge Facility and Mitigation Lands	\$935,000.00
Contingencies and Operating Costs	\$1,095,835.00

Attached as Exhibit C(3) the documentary evidence concerning commitments to funding the project.

Attached as Exhibit C(4) are copies appraisals performed by the U.S. Army Corps of Engineers regarding the dredged harbor facility. Attached as Exhibit M(1) are copies of the appraisal performed by two (2) independent appraisers regarding all the separate parcels of land to be acquired from private parties.

***(d) A Payment vs. Revenue Statement, such statement to contain a tabulation of the estimated annual payments which will be required to meet any indebtedness incurred by the municipality in undertaking the project as well as a summary of anticipated revenues from the project including estimated amounts and dates of receipt of such revenues. There shall be included in the appendix to the application, with reference to Revenues, the following:***

- 1. where anticipated revenues are based on the said of land, a detailed and thorough discussion of the projected sale price of the land used in establishing projected revenues and a discussion of the feasibility of the projected dates used in establishing the time at which such revenues shall become available; and***
- 2. there shall be included in the appendix to the application with reference to payments, a complete amortization schedule for retiring the indebtedness incurred as a result of the project.***

Response: The Payment Versus Revenue Statement is set forth under tab D, as the Northwest Tennessee Regional Port Authority Statement of Revenues and Expenses.

Enclosed under Tab D (1) is the Debt Service Schedule for the \$2,750,000.00 General Obligation Bonds of Lake County.

Enclosed under Tab D (2), (3) and (4) are summaries of the results of the economic impact studies conducted for the purpose of determining the feasibility of the Project.

The Principal source of funding for the repayment of Lake County's General Obligation Bonds is the ad valorem property tax revenue received each year by the County. Both the economic impact study of Younger Associates and the review report of University of Memphis, Sparks Bureau of Business and Economic Research, indicate that the development of the Port and Industrial Park complex will create approximately 5,604 direct and indirect jobs in the Three (3) counties, and approximately \$4 Million Dollars of new local tax revenue. These increased tax revenues will be used to fund the Bond indebtedness.

Currently the plan is for Lake County to draw Bond Anticipation Notes as the construction and start-up phases of the Project are commenced. With the completion of these phases, Lake County will issue General Obligation Bonds as contemplated herein. The optimistic perspective holds that the one time economic boost from the construction of the Port, currently estimated to be approximately \$558,173.00 will provide sufficient funding for the outstanding debt obligations as industries locate and build their new industrial facilities, thereby increasing the tax base large enough to cover the yearly debt service obligation. In the event this optimistic view is not true, the anticipated Note/Bond indebtedness will be funded by Lake County through an Ad Valorem property tax increase. Tab E details the amount of the property taxes necessary under the current existing tax rate to fund the bond payment obligations. The most current financial information discloses that each one cent (\$.01) of the ad valorem tax rate generates approximately \$5,455.00 of taxes. Accordingly \$165,000.00 in new yearly note/bond debt service would be off set by an approximate \$0.31 tax increase. In follow-on years as the yearly debt service increases to approximately \$213,000.00, and assuming no positive or negative economic impact, the ad valorem tax rate would require an increase of \$0.39 over today's rates.

*(e) An Emergency Financing Statement, such statement to contain a thoroughly discussed plan showing where the municipality shall obtain any emergency funding needed to meet expenses in the event project revenues do not materialize on schedule.*

Response: The Principal source of funding for the repayment of Lake County's General Obligation Bonds issued to finance the Industrial Park is the ad valorem property tax revenues received each year by the County. In the event of inadequate anticipated revenues from the operation of the Port and Industrial Park, Lake County will be required

to increase taxes to fund the payment of the Bonds. To the extent development costs of the Industrial Park are funded by grants of the State, the County will cooperate in necessary initiatives with such parties to mitigate the financial loss. A tax analysis for a tax increase is attached as Exhibit E.

*(f) Sworn Statements from the appropriate official of the municipality, such statements to contain:*

*1. the total assessed value of property within the municipality by the assessor of property (assessed value is the value of all property within the municipality to which the tax rate is applied),*

*2. a general tabulation of all outstanding General Obligation bonds issued, by the chief fiscal officer of the municipality, and*

*3. a specific tabulation of all outstanding bonds issued under the authority of TCA 6-2901 et seq., and/or TCA 13-1301 et seq., by the chief fiscal officer of municipality.*

Response: Attached under Tab F, are the Sworn Statements of Lake County Officials certifying the following:

- 1) Lake County Tax Assessor certifies the total value of all property located in Lake County as \$207,378,277.00;
- 2) Lake County Chief Fiscal Officer certifies the amounts of the outstanding General Obligation Bonds are Rural Development Bonds (Series 2001), \$1,599,004; and School Bonds (Series 2003), \$7,150,000.00.
- 3) There are no outstanding Bonds which were authorized under the Industrial Park Act.

*(g) An Engineering Report, the engineering report shall contain the following information and/or address itself to the following items with respect to the site:*

*1. topographic and/or terrain conditions at the site,*

*2. location of the site with respect to access to highways, rail and/or water transportation facilities, including a discussion of any problems or*

*inherent drawbacks to the use of the site occasioned by the location of the site, with respect to these various modes of transportation,*

*3. soil conditions at the site, including estimated quality of the soil with respect to industrial usage of the site, estimated depth to rock, probability of ground water and/or internal drainage problems with respect to site soil and any corrective measures to be taken with respect to site soil conditions,*

*4. site configuration and any problems associated with the configuration of the site, including the probability of wasted property,*

*5. site drainage, including a discussion of the nature of site drainage, provisions to handle site drainage and any problems associated with site drainage. A discussion of flood conditions relative to the site shall be included in this section of the report,*

*6. provisions for serving the site with water, gas, electricity, and sewage collection:*

*(i) with respect to water, the report shall include sufficient information to establish that proposed water service to the site shall be adequate, including water for fire protection. The discussion shall include an analysis of water pressures and quantities, the basis for establishing storage capacities, basis for establishing consumptive demands as well as the basis for establishing fire demands,*

*(ii) with respect to sources of energy or power, a discussion of the manner and method of supplying needed energy or power to the park, including the type of energy sources available and to be supplied,*

*(iii) with respect to sewage collection, a discussion of the manner and method of collecting park waste and disposing of it. A discussion of estimated park waste and the basis for such estimate, a discussion of sewer hydraulics and a discussion of the capacity at the local treatment facility to handle the anticipated park waste,*

*(iv) in the event that any of the above services are not to be provided, the report should discuss in detail the impact on the park or site of not providing this service.*

*7. The engineering report shall contain sufficient maps to:*

- (i) *delineate the location of the site, with respect to local modes of transportation, with respect to the municipality's business district and with respect to sources of labor,*
- (ii) *to show all improvements proposed on the property,*
- (iii) *to indicate anticipated subdivision of the property,*
- (iv) *to show the present terrain features and topographic relief of the site (suggest a minimum 10' contour interval), and*
- (v) *to show the nature and extent of any proposed alterations to the site topography.*

Response: Attached as Exhibit G is the Engineering Report for the Project.

(h) *A Statement by an Attorney of Law, to the effect that there are or are not legal problems associated with implementation of the project. In the event that legal complications do exist, the statement shall discuss such problems and their probable impact upon the project.*

Response: Attached as Exhibit H is the statement of Counsel to the Port Authority John M. Lannom.

(i) *A Statement as to Available Sources of Labor within a twenty-five (25) mile radius of the site, including a discussion of the basis of establishing available labor supplies.*

Response: Attached as Exhibit I is the Summary of the Northwest Tennessee Workforce Study of relevant data commissioned by the Northwest Tennessee Workforce Board and Dyersburg State Community College, December 2003.

(j) *A Discussion of any Environmental Problems anticipated and their effect upon the project.*

Response: Attached as Exhibit J is the Environmental Studies conducted by the U.S Army Corps of Engineers. As previously stated, there are no negative environmental problems anticipated and no significant impact to wildlife, aquatic resources, cultural resources, endangered or threatened species, vegetation, flood-plane management, wetlands, recreation, air quality, water

quality or prime and unique farmlands. There were no direct impacts on human health or the environment which would result from the project.

***(k) A Plat and Legal Description of the Property.***

Response: Attached as Exhibit K are a Plat and Legal Description of the lands comprising the Project Site.

***(l) An Appendix to the Application containing that information as requested by Section 0500-20.06(c),(d) and any other information with regard to the feasibility of the project that the municipality feels should be included or desires to place in the application.***

*None*