

We plan to formally request that the U.S. Fish and Wildlife Service (USFWS) require a comprehensive biological survey on a 58-acre tract of land slated for heavy industrial expansion by Vulcan Materials Company (Dixie Lee Quarry). Vulcan Materials is currently seeking local zoning approval to permanently clear-cut this forested parcel and commence 80-foot-deep extractive blasting. While our residents are not wildlife biologists, we have visually confirmed the presence of these nocturnal species, and have documented their habitation of the area. The geological and biological profile of this specific 58-acre tract perfectly matches the critical habitat requirements for multiple federally protected species under the Endangered Species Act (ESA). We believe that allowing a corporate entity to bulldoze and blast this acreage without a prior federal presence/absence survey poses a severe risk of an illegal "take" regarding the following species:

1. Summer Maternity Roosting Habitat (Indiana and Northern Long-Eared Bats) The 58-acre expansion parcel currently consists of some undisturbed, mature hardwood canopy. This acreage possibly contains shagbark hickory, white oak, and dead snags with exfoliating bark. This is the exact canopy profile utilized as summer maternity roosting habitat by the federally endangered Indiana Bat (*Myotis sodalis*) and Northern Long-Eared Bat (*Myotis septentrionalis*). Allowing Vulcan to clear-cut this timber without acoustic monitoring and mist-netting during the active summer maternity season places these protected species at high risk.

2. Subterranean Hibernacula (Gray Bats and Karst Geology) Knox County is situated on highly sensitive karst (limestone) topography. The active Dixie Lee Quarry site immediately adjacent to this expansion parcel has a documented history of hydrological friction, including a formal "Notification of Sinkhole Repair" filed with the Tennessee Department of Environment and Conservation (TDEC) in May 2024. The documented presence of sinkhole activity confirms an active subterranean cave and void network beneath this site, which serves as primary winter hibernacula for the endangered Gray Bat (*Myotis grisescens*). Expanding industrial blasting and aggressive groundwater dewatering onto this 58-acre tract threatens to permanently alter the micro-climate of these voids or cause catastrophic structural collapse of unmapped hibernacula.

The consequences of habitat destruction are permanent, we cannot rely on the applicant's assumption that the land is void of protected species. We will formally request that the USFWS take the following actions: Issue a Technical Assistance Letter to Vulcan Materials and the Knoxville-Knox County Planning Commission, officially notifying them that this parcel contains highly suitable habitat for federally endangered chiroptera. Mandate a Section 10 Presence/Absence Survey (incorporating both summer roosting netting and subterranean karst evaluation) to be conducted by a federally permitted, independent biologist. Stipulate that no land disturbance, timber harvesting, or local zoning approvals for extractive mining be granted until this federal survey is completed and reviewed by your office.