

livingston78@outlook.com

From: Brooxie Carlton <brooxie.carlton@tn.gov>
Sent: Friday, August 21, 2026 4:35 PM
To: Andrew Livingston; Jill White
Subject: Re: Objection, Limited to the RV Site Component, Under ARC Code § 8.4(c) — Pending Doe Mountain Recreation Authority Application, Pedro Shoun Property, Johnson County

Hi Andrew,
We are working on it. We need to touch base with the Appalachian Regional Commission. We should hear back from them next week. We'll reach out then.
Thanks,
Brooxie

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From: Andrew Livingston <livingston78@outlook.com>
Sent: Friday, 21 August 2026 12:14:57
To: Brooxie Carlton <brooxie.carlton@tn.gov>; Jill White <Jill.White@tn.gov>
Subject: [EXTERNAL] RE: Objection, Limited to the RV Site Component, Under ARC Code § 8.4(c) — Pending Doe Mountain Recreation Authority Application, Pedro Shoun Property, Johnson County

Good afternoon Brooxie.

Have you had a chance to review this matter with your staff or DMRA? Do you have any update you can share at this time?

Regards,

Andrew Livingston
Doe Valley Campground


From: Brooxie Carlton <brooxie.carlton@tn.gov>
Sent: Thursday, August 13, 2026 4:52 PM
To: Andrew Livingston <livingston78@outlook.com>; Jill White <Jill.White@tn.gov>
Subject: RE: Objection, Limited to the RV Site Component, Under ARC Code § 8.4(c) — Pending Doe Mountain Recreation Authority Application, Pedro Shoun Property, Johnson County

Hi Mr. Livingston,
Thank you for sharing your concerns and objection. We will look into this over the next few days. The project was just awarded, but we will hold off on getting started until this is resolved.
We appreciate you reaching out.
Brooxie

BROOXIE CARLTON | Assistant Commissioner, Rural Development



From: Andrew Livingston <livingston78@outlook.com>

Sent: Thursday, August 13, 2026 2:15 PM

To: Brooxie Carlton <brooxie.carlton@tn.gov>; Jill White <Jill.White@tn.gov>

Subject: [EXTERNAL] Objection, Limited to the RV Site Component, Under ARC Code § 8.4(c) — Pending Doe Mountain Recreation Authority Application, Pedro Shoun Property, Johnson County

Ms. Carlton and Ms. White,

I am the owner of Doe Valley Campground, a private campground with 21 full-hookup RV sites at 271 Pedro Shoun Lane, Mountain City, Tennessee, in Johnson County. I am writing to formally object, in advance of the State's review, to one specific component of the pending Appalachian Regional Commission application submitted by the Doe Mountain Recreation Authority ("DMRA") for its Pedro Shoun property — and to be equally clear about what I am not objecting to.

The project. At its April 7, 2026 meeting, the DMRA Board voted unanimously to commit matching funds for an ARC grant to construct "20 RV sites and a bathhouse on the Pedro Shoun property." That property consists of 80 acres DMRA purchased from my business (Doe Valley Campground) in 2024, and it is immediately adjacent to my operating campground — in fact, the two properties share a boundary line.

The scope of my objection. I object only to the 20 RV sites. ARC Code § 8.4 provides that "ARC grant assistance shall not be used for... "projects that promote unfair competition between businesses within the same immediate service area." An RV site is my core product — I operate 21 full-hookup RV sites on the immediately adjacent parcel — and a state- and federally-funded, tax-exempt operator building the identical product on my former property line falls squarely within what § 8.4(c) is meant to prevent.

I do not object to the bathhouse, or to any complementary lodging DMRA may wish to add, including cabin rentals should DMRA choose to pursue them. Support infrastructure and lodging types outside my own product line do not compete with my business, and I have no interest in blocking investment in this community on those fronts. I am raising this objection narrowly and in good faith, limited to the one element that actually displaces revenue from an existing taxpaying business.

DMRA's own adopted planning document establishes the competitive harm from RV camping specifically. The Doe Mountain Recreation Area Operations Center Expansion Master Plan, prepared by McGill Associates, P.A., dated September 2025, and adopted unanimously by the DMRA Board on December 2, 2025, records at pages 27–28 that in a DMRA-sponsored focus group, "the business members in attendance at the focus group did not want to see campgrounds on park property because of the competition that it would introduce," while noting those same owners "were very much open to complimentary lodging being built on site." The same document, at page 34, states DMRA's own recommendation: camping "should be weighed to minimize competition with privately owned opportunities near the park." The 20-RV-site component of the pending ARC application does the opposite of what DMRA's own adopted plan recommends — while a bathhouse or cabins would not.

Additional concerns specific to the RV-site component:

No market or feasibility analysis exists for RV camping at this location. The 86-page master plan contains no quantitative market study, occupancy analysis, or demand forecast supporting additional RV capacity in this market. Its only treatment of competitive impact is the focus-group objection quoted above, which speaks directly against it. I can personally attest that the area surrounding DMRA has seen a spurt of growth in RV campgrounds. Currently supply exceeds demand by a meaningful margin for all campgrounds surrounding the DMRA property, as well as those in the general vicinity. DMRA already has 5 RV sites at its Harbin Hill Road Adventure center, they also recently acquired Roan Creek Campground. Please consider the occupancy levels at their own facilities when reviewing this issue.

The land was acquired from the objecting business, with federal assistance. DMRA purchased these 80 acres at a discounted market price from my business in 2024 and received \$159,000 in Land and Water Conservation Fund reimbursement for that purchase (confirmed in DMRA's April 7, 2026 minutes). Using federal and state funds to acquire land from a private RV campground, and then building RV sites on it, is a direct case of the harm § 8.4(c) exists to prevent. Further to this point, I agreed to sell DMRA the parcel based on the original adopted master plan which showed a lodge and training center to be built. Also relying on the executive directors own statement via email that they would present the purchase to the board for a "training center". Subsequent to the purchase of the property and without proper due diligence the board of directors and the executive director decided to build 20 RV sites on the newly acquired property.

Subsidized pricing on the directly competing product. As a governmental authority with no profit requirement and access to grant and carbon-credit revenue, DMRA can sustain below-market RV pricing indefinitely in a way a private operator cannot. This concern applies specifically to the RV product; I am not raising a pricing objection to any bathhouse or cabin component.

DMRA's own commissioned visitor data confirms the RV sites and my campground draw from the same immediate service area. A June 20, 2024 economic impact and visitor-demographics study by Tennessee Tech University's Center for Rural Innovation, commissioned by DMRA and addressed directly to its Executive Director, surveyed 2,055 DMRA visitors across 421 zip codes in 31 states and found North Carolina residents are DMRA's single largest visitor group at 49.7%, ahead of Tennessee (29.7%) and Virginia (7.3%); together these three states account for 87% of DMRA's total visitation. This is DMRA's own data, not mine, and it confirms the RV sites and my adjoining, privately owned campground draw from the identical regional visitor pool — precisely the "same immediate service area" § 8.4(c) is meant to protect (Tennessee Tech / Center for Rural Innovation study, addressed to DMRA's Executive Director).

On August 11th I spoke directly with the executive director Charles Ridlehuber and made him aware of my objection. I informed the director that 82% of guests that book at our campground stay for 14 days or less, and this is the exact visitor DMRA is trying to attract at its planned project by his own admission during that meeting.

Requested action. I respectfully request that the State require DMRA to remove the 20 RV sites from this application before it is certified or forwarded to the Commission, while the bathhouse and any other non-competing elements proceed unaffected. If the State prefers a different remedy, I will equally welcome a requirement that DMRA demonstrate compliance with its own adopted master plan recommendation on this point, before that component of the application proceeds.

I am willing to meet with your office and to provide the underlying documents, all of which are DMRA's own public records. I would also note that a straightforward alternative exists that fully resolves this specific issue: DMRA could drop the RV-site component and redirect that portion of the grant to the bathhouse or other complementary uses, exactly as it already did when it chose to acquire the existing Roan Creek Campground rather than build new RV capacity there.

Thank you for your attention. I would appreciate written confirmation of receipt and of this application's current review status.

I have attached a copy of the FOIA request I submitted to the ARC office in Washington. If you can provide any of the information contained in the request I would greatly appreciate that. Most importantly item number 1. The complete application for the project.

Respectfully,

Andrew Livingston, Member
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