



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-0435

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COMMISSIONER

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July 5, 2017

**Via Electronic Mail to Shannon.Allen.1@us.af.mil**

Attn: Shannon Allen, NEPA, Natural & Cultural Resource Planner  
United States Air Force  
Arnold Air Force Base  
100 Kindel Drive, Suite B-311  
Arnold AFB, TN 37389

Dear Mrs. Allen:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Air Force (USAF) *Proposed Raw-Land New-Build 265-foot Self-Support Communications Tower Site* Draft Environmental Assessment (EA) with a Draft Finding of No Significant Impact (FONSI) at Arnold Air Force Base (AAFB). USAF seeks to develop a telecommunications tower along Hap Arnold Drive/Pumping Station Road and Wattendorf Memorial Highway within AAFB to address cellular coverage gaps. The proposed telecommunications tower site is defined as an approximate 10,000-square foot lease area, which is to be developed with a 265-foot self-support tower and associated equipment along with an approximate 250-foot access road/utility easement, located southwest of the intersection of Hap Arnold Drive/Pumping Station Road and Wattendorf Memorial Highway on the east side of Hap Arnold Drive/Pumping Station Road in the AAFB, Coffee County, Tennessee 35016.

Actions considered in detail within the Draft EA include:

- **Alternative 1 – Construction of the Proposed Telecommunications Tower Site.** Under Alternative #1, a 265-foot self-support tower and associated equipment would be constructed within an approximate 10,000-square foot lease area along with access road/utility easement southwest of the intersection of Hap Arnold Drive/Pumping Station Road and Wattendorf Memorial Highway on the east side of Hap Arnold Drive/Pumping Station Road within AAFB, Coffee County, Tennessee. In addition, tower installation will include an above-ground storage tank (AST) to supply diesel fuel for an emergency generator. Based on the cell coverage needs of the immediately surrounding region, construction of the proposed telecommunication tower site was deemed the preferred alternative for the proposed action.

- **Alternative 2 – No Action Alternative.** Under Alternative #2, a telecommunications tower site would not be installed on AAFB property. Existing cell phone coverage gaps, capacity issues, and limited signals would continue within the designated region. In addition, under Alternative #2, no impacts to existing environmental resources related to the proposed actions of the EA would occur. The proposed site would remain in its current conditions.

TDEC has reviewed the Draft EA with Draft FONSI and provides the following comments.

### **Plant and Animal Resources**

TDEC recommends that the requesting agency contact the Tennessee Wildlife Resource Agency (TWRA). TWRA manages information related to state listed rare animal species and should be consulted.<sup>1</sup>

### **Water Resources**

TDEC recommends that best management practices related to stormwater runoff be addressed through erosion prevention and sediment control measures implemented during construction, and that these practices be included in the Final EA.<sup>2</sup>

### **Air Pollution**

TDEC has no specific comments regarding the proposed action or its alternatives with regard to air pollution.<sup>3</sup>

### **Solid Waste Management**

Per Section 3.4.1 “Impacts from Hazardous Materials” it is understood that no toxic materials or hazardous wastes were identified at the proposed telecommunications tower site by the USAF (pp. 16-17). Any solid wastes or hazardous wastes associated with the construction and future operation of the telecommunications tower site must be managed in accordance with the Solid and Hazardous Waste Rules and Regulation of the State of Tennessee (TDEC DSWM Rule 0400 Chapters 11 and 12).<sup>4</sup> TDEC recommends that the Final EA reference that any wastes that are generated during the construction process or uncovered during site preparation are subject to the Solid and Hazardous Waste Rules and Regulations of the State of Tennessee.

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<sup>1</sup> Please contact Rob Todd, [rob.todd@tn.gov](mailto:rob.todd@tn.gov), 615-781-6577 with TWRA to ensure that legal requirements for protection of state listed rare animals are addresses as well as the U.S. Fish and Wildlife Service Field Office, Cookeville, Tennessee at 931-525-4970 for comments regarding federal listed species and removal of trees.

<sup>2</sup> Best management practices related to stormwater runoff for erosion prevention and sediment control can be found at <http://www.tn.gov/environment/article/permit-water-npdes-stormwater-construction-permit>.

<sup>3</sup> Section 3.6.1 “Impacts to Air Quality” identifies air permits that may be required for the project. If there are additional questions relating to required air permits, please visit APC’s website at <http://www.tn.gov/environment/topic/permit-air>.

<sup>4</sup> Reference TDEC SWM Rule 0400 Chapter 11 for Solid Waste and Chapter 12 for Hazardous Waste <http://sos.tn.gov/effective-rules>. Moreover, as the site and surrounding areas were categorized as potential locations for unexploded ordnances (UXO), this listing of wastes includes any munition-related materials uncovered during excavation or construction that could be classified as wastes per Chapter 12 of the stated Rules and Regulations.

The Draft EA with Draft FONSI identifies that a double-walled AST to supply diesel fuel for an emergency generator will be installed on-site. An unplanned sudden or non-sudden release to the environment could be deemed a waste and thus subject to the aforementioned Rules and Regulations. Planning and design of the AST should consider that certain ASTs must comply with federal Spill Prevention, Control, and Countermeasure (SPCC) requirements. TDEC recommends that the Final EA specify whether the on-site AST must comply with SPCC requirements, and if so, provide discussion relating to them.

TDEC appreciates the opportunity to comment on this Draft EA with Draft FONSI. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



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Tennessee Department of Environment and Conservation  
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Lisa Hughey, TDEC, SWM  
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