



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

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July 10, 2018

**Via Electronic Mail to [wdwhite0@tva.gov](mailto:wdwhite0@tva.gov)**

Attn: W. Douglas White, NEPA Specialist  
Tennessee Valley Authority  
400 West Summit Hill Drive, WT 11D  
Knoxville, Tennessee 37902

Dear Mr. White:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) *Draft Environmental Assessment* (Draft EA) which proposed to *introduce certified sterile (triploid) grass carp (CTGC) into TVA's Ocoee Project #1 Reservoir*, locally referred to as Parksville Reservoir, to control the spread of the invasive aquatic plant, hydrilla. Hydrilla currently occurs in roughly 182 acres (10%) of Parksville Reservoir and if unabated could spread into the rest of Parksville Reservoir, and potentially to other reservoirs in the TVA system.<sup>1</sup> According to the Draft EA grass carp eat aquatic vegetation, including hydrilla, and can be an effective measure to address infestations of hydrilla that would otherwise continue to spread. Additionally, triploid carp are sterile and cannot naturally reproduce, which enables the fish populations to be easily monitored and controlled without chance of long term establishment.<sup>2</sup>

Actions considered in detail within the Draft EA include:

- **No Action Alternative.** Under the No Action Alternative, TVA would not stock Parksville Reservoir with CTGC to address the spread of hydrilla. TVA does not perform aquatic vegetation management in Parksville Reservoir, and would not change its management of aquatic plants; therefore it is expected that hydrilla would continue to grow in the majority of the Reservoir.<sup>3</sup> The potential environmental effects of adopting the No Action Alternative are considered in the Draft EA to provide a baseline for comparing the potential effects of implementing the proposed action

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<sup>1</sup> Hydrilla is capable of rapid growth and reproduction given ideal growing conditions. Hydrilla plant fragments can also be easily transported from one waterbody to another via recreational and commercial boating. The control of hydrilla increases the overall health and function of newly affected reservoirs, which is an important environmental stewardship objective of TVA's Natural Resources program.

<sup>2</sup> Stocking grass carp is cost effective, provides long term aquatic vegetation management, and reduces the need for large scale herbicide and mechanical management techniques.

<sup>3</sup> Parksville Reservoir is subject to TVA's aquatic vegetation treatment program as outlined in its 2015 memo for the 1993 Aquatic Plant Management Program, Supplemental Environmental Impact Statement. The memo addresses the application of herbicides as a means of aquatic vegetation management for various species including hydrilla. If TVA wanted to implement aquatic vegetation herbicide treatment at Parksville in the future, a reservoir specific environmental review would be completed to evaluate the potential impacts of the treatment program.

- **Proposed Action Alternative.** Under the Proposed Action Alternative, TVA would stock CTGC for maximized control of hydrilla into Parksville Reservoir. TVA would survey standing hydrilla biomass and coverage within Parksville Reservoir annually to inform all management decisions. TVA would also continue to monitor other reservoirs within the Ocoee system (i.e., Ocoee #2 and Ocoee #3), and downstream Hiwassee river for early hydrilla detection. Should hydrilla introductions occur in these surrounding reservoirs, TVA would consider what management actions might be appropriate in these surrounding reservoirs as funding allows and subject to additional environmental review.

TDEC has reviewed the Draft EA and determined that it has no additional comments regarding the proposed action or no action alternative at this time.<sup>4</sup> TDEC appreciates the opportunity to comment on this Draft EA. 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,



Kendra Abkowitz, PhD  
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cc: Bill Avant, TDEC, TSP  
Tom Moss, TDEC, DWR  
Stephanie Williams, TDEC, DNA

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<sup>4</sup> TDEC concurs that the use of CTGC to address hydrilla in Parksville Reservoir is a more preferential management technique than the application of the herbicide 2,4 D or mechanical management practices which could potentially increase turbidity and possibly affect water quality.