



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

DAVID W. SALYERS, P.E.  
COMMISSIONER

BILL LEE  
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June 14, 2019

**Via Electronic Mail to CorpsLRNPlanningPublicCom@usace.army.mil**

Attn: Cody Flatt, Biologist  
Department of the Army  
Nashville District, Corps of Engineers  
110 9th Avenue South, Room A-405  
Nashville, TN 372032

Dear Mr. Flatt:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Army Corps of Engineers (USACE) – Nashville District, Draft Environmental Assessment (EA) and Unsigned Finding of No Significant Impact (FONSI) to assess the impacts of potential construction of a barge loading facility at Lock C, Lake Barkley in Montgomery County, Tennessee. According to USACE, the purpose of the proposed action is to construct improvements to U.S. Government property (Lock C, Cumberland River, Tennessee/USACE – Nashville District) for improved barge loading and unloading to facilitate efficient mobilization of military equipment in support of national defense mobilization requirements at Fort Campbell (FTC), Kentucky. Actions considered in detail within the Draft EA include:

- **Alternative 1 – No Action Alternative** – Evaluation of the no action alternative is required by Engineer Regulation 200-2 and the National Environmental Policy Act. The no action alternative provides an environmental baseline to compare the impacts of the proposed action and alternatives. Under Alternative 1, no work would take place. No environmental impacts would occur to the site other than those occurring from continued use of the area by FTC for loading and unloading on to barges. The limited facilities would continue to create difficulties during training and limit the use of the area for large scale mobilization of military equipment.
- **Alternative 2 – Open Field Staging Area** – Alternative 2 would allow the U.S. Department of the Army to construct an equipment staging area to Lock C to facilitate barge loading operations. A barge loading ramp exists from previous deployments conducted by FTC. This loading ramp would stay in place and be used for future loading and unloading activities. A 3.5 acre staging area would be constructed in the middle of the property on the northern end in an open field. This area consists of modified graded topsoil to withstand vehicle traffic. Improvements such as

grading and gravel would be added to make an improved area for staging equipment. An improved drainage system would be added to the site to make it more suitable as a staging area for heavy equipment.

- **Alternative 3 – Locate Staging Area in Forested Block** – Alternative 3 would construct the staging area in the northwest corner of the project site in a forested area. All other associated improvements would still be implemented. The staging area (3.15 acres) would be slightly smaller and require removal of trees within a mid-successional forest.

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

### **Cultural and Natural Resources**

TDEC believes the Draft EA adequately addresses potential impacts to cultural and natural resources within the proposed project area.<sup>1</sup>

### **Air Resources**

TDEC believes the Draft EA adequately addresses potential impacts to air resources. Additionally, there are no air contaminant sources proposed to be built in association with the project, and there is no open burning identified as a disposal technique for vegetative debris on site.

### **Water Resources**

TDEC concurs with the Draft EA that a construction stormwater permit will be necessary before the construction project begins. USACE has already obtained an individual Aquatic Resource Alteration Permit (ARAP), which was issued in April 2019. It will be important for the facility to have a spill response plan and equipment capable of addressing a spill. TDEC encourages USACE to include discussion relating to this in the Final EA. Additionally, TDEC recommends that a spill response plan or protocol include plans to notify the City of Erin should there be a spill or release into the Cumberland River; timely and effective communication would be critical were such an event to occur.

### **Solid Waste**

Although Section 3.9 “Hazardous, Toxic, and Radioactive Waste” states that there is no confirmation that any hazardous materials or wastes will be present at the proposed areas in cargo and that no hazard wastes are expected to be handled, TDEC recommends that any wastes associated with activities involved in construction, future operations, and maintenance be managed in accordance with the Solid

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<sup>1</sup> This is a state-level review only and cannot be substituted for a federal agency Section 106 review/response. Additionally, a court order from Chancery Court must be obtained prior to the removal of any human graves. If human remains are encountered or accidentally uncovered by earthmoving activities, all activity within the immediate area must cease. The county coroner or medical examiner, a local law enforcement agency, and the state archaeologist’s office should be notified at once (Tennessee Code Annotated 11-6-107d). If you have questions, please contact Daniel Brock, State Programs Archaeologist at 615-687-4778 or [Daniel.Brock@tn.gov](mailto:Daniel.Brock@tn.gov).

and Hazardous Waste Rules and Regulations of the State of Tennessee (TDEC Division Rule 0400 Chapter 11 and 12, respectively).

TDEC appreciates the opportunity to comment on this Draft EA with Unsigned 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,



Kendra Abkowitz, PhD  
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Tennessee Department of Environment and Conservation  
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