



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

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April 1, 2020

Via Electronic Mail to daniel.l.etson.civ@mail.mil

Attn: Dan Etson, Environmental Engineer
NEPA Program Manager Compliance Branch
Fort Campbell's Directorate of Public Works
871 Bastogne Avenue,
Fort Campbell, KY 42223

Dear Mr. Etson:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the United States Army (Army) *Fort Campbell Cantonment Area Draft Programmatic Environmental Assessment (PEA) and unsigned Finding of No Significant Impact (FONSI)*, which considers environmental effects of construction, operation, and maintenance of Master Plan projects in the Cantonment Area at Fort Campbell, Kentucky.¹ The Draft PEA is intended to facilitate NEPA compliance for routine infrastructure projects within the Cantonment Area, which consists of eight individual Area Development Plans (ADPs) (i.e., distinct areas within the Cantonment Area). The PEA presumes the continued implementation of the extensive and on-going Fort Campbell environmental management program. According to the Army, as a result of established environmental processes that have occurred at Fort Campbell, it is no longer necessary to address historically common and repetitive impacts with additional Environmental Assessments/FONSIs for individual action items, which are executed daily throughout the entire installation. Therefore, the PEA, if implemented, would identify, document, and evaluate effects of applying standard practices for multiple Master Plan projects in the Fort Campbell Cantonment Area.²

Actions considered in detail within the Draft PEA with Unsigned FONSI include:

- **Alternative A – Implement All Master Plan Projects (Proposed Action).** Fort Campbell proposes to implement standardized operating practices for routine Master Plan projects in the Cantonment Area. These projects include all short-range (0 to 5 years), mid-range (5 to 16 years), and long-range (16 to 25 years) projects as described in each ADP. According to the PEA, Implementation of the Proposed Action would allow for a streamlined process and would presume the continued implementation of the extensive and on-going Fort Campbell environmental management program. Compliance with installation environmental management plans, corresponding environmental laws and implementing regulations

¹ The ADPs are linked to the 2018 Capital Investment Strategy (CIS) for Fort Campbell. The CIS ties all projects to one central document. These documents are collectively referred to as the "Master Plan" in the PEA.

² For example, ground-disturbing activities that remove vegetative cover for extended periods of time due to construction, demolition, renovation, and/or automobile traffic activities that are to occur on a daily basis are being monitored at Fort Campbell to avoid erosion and deposition of sediment into the downstream watershed.

would be accomplished for all Cantonment Area Master Plan projects. This alternative captures the wide range of projects represented in the Master Plan. The general types of construction, renovation, and demolition projects described in the individual ADPs for the Cantonment Area are summarized by planning district in the Draft PEA.³

- **Alternative B – Implement Short-Range and Mid-Range Projects.** Alternative B is similar to the Proposed Action in that it includes the short-range (0 to 5 years) and mid-range (5 to 16 years) projects described in each ADP. As the estimated timeframe for the long-range projects extends from 16 to 25 years, the project timelines and discretionary funding from Congress are uncertain. By that time, this PEA would also need to be updated to reflect changes in conditions and priorities at Fort Campbell. Therefore, the long-range projects are not included in Alternative B.
- **Alternative C – No Action Alternative.** The No Action alternative serves as a baseline against which the impacts of the proposed action and alternatives can be evaluated. Under the No Action alternative, the implementation of the Master Plan projects would not occur in the Cantonment Area at Fort Campbell. Baseline conditions would remain the same for NEPA review and discrete environmental impact analysis would continue for each individual project in each of the seven Cantonment Area districts. Although the No Action alternative would eliminate unavoidable adverse, short- and long-term impacts associated with the Proposed Action, the No Action alternative would not satisfy selection standards established for this project, resulting in generation of duplicative environmental analysis, documentation and initiation of public notification procedures.

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

Cultural and Natural Resources

TDEC believes the Draft PEA adequately addresses potential impacts to cultural and natural resources within the proposed project area and supports the plan.⁴

Air Resources

TDEC encourages the Army to provide additional clarification relating to General Conformity requirements found on pages 3-4 and 3-9 of the document, respectively, in the Final PEA.

TDEC encourages the Army to consider hiring contractors for the onsite demolition, earthmoving and construction projects that can certify or demonstrate that the diesel engines powering the equipment and transport trucks are being properly maintained, have all emissions control equipment in good working order and where possible; are using their newer trucks for routine, long term onsite projects to help mitigate emissions.

TDEC recommends that should open burning be considered for disposal of wood wastes generated from the proposed project, alternatives to open burning, including chipping, composting or grinding of wood waste, be

³ See Table 2-2 on electronic page 29 of the Draft PEA.

⁴ 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.

evaluated first. If open burning is selected for wood waste disposal the Army should consider implementing a smoke management plan, not burning on air quality alert days, and coordinating burning with other agencies (local and State air pollution control agencies, forestry agencies and local fire departments). TDEC encourages the Army to include discussion relating to these considerations in the Final PEA.

Water Resources

TDEC believes that the Draft PEA adequately addresses potential impacts to water resources. TDEC encourages the Army to follow all best management practices wherever possible, 50 foot stream buffers should be in place, and additional stormwater controls should be added for any additional impervious surfaces (buildings, asphalt, etc.).

Solid Waste

TDEC believes that the Draft PEA adequately addresses potential impacts to solid and hazardous waste.

TDEC appreciates the opportunity to comment on this Draft PEA 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,



Matthew Taylor

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