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

DAVID W. SALYERS, P.E.
COMMISSIONER

BILL LEE
GOVERNOR

June 3, 2020

Via Electronic Mail to cody.a.flatt@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, *Dale Hollow Dam and Reservoir Water Control Manual* (WCM) *Draft Environmental Assessment (Draft EA) and unsigned Finding of No Significant Impact (FONSI)*, which is located in Clay, Pickett, Overton and Fentress Counties, in Tennessee.[1] According to USACE, the purpose of the proposed action is to update the Dale Hollow Dam and Reservoir WCM to include current project operations under existing congressional authorizations.

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

- **No Action Alternative.** The No Action Alternative (NAA) would deny the revision of the 1998 Water Control Manual (WCM). The WCM would remain the same. According to USACE, this alternative is considered unacceptable due to limitations in emergency operations and increased demand for flood control, water quality, water supply, and hydropower generation. However, it is included in the alternatives analysis to establish a baseline condition for existing human and natural environmental conditions, to allow comparison between future with and without project actions, and to determine potential environmental effects of proposed project alternatives. Evaluation of the NAA is a requirement under NEPA regulation.

[1] The WCM at Dale Hollow serves as a guide for the day-to-day and emergency regulation of the project and to provide background information on the project. The manual presents the plan of regulation for the project and furnishes information pertinent to its operation. This update would incorporate changes in basin hydrology and consumptive demands due to years of growth and development, new/rehabilitated structural features, and environmental considerations. The Draft EA serves to evaluate the impacts of the proposed revision of the 1998 Dale Hollow Dam and Reservoir WCM.

- **Proposed Action Alternative**. The revision of the WCM would involve several updates to incorporate recent historical data (1998-2020), watershed characteristics, communication networks, and modern forecasting methods. According to USACE, these updates are informational in nature and provide prudent knowledge to Nashville District water managers. This document only evaluates proposed operational alterations to the 1998 WCM. Proposed operational modifications include:

    - *Control Flow at Celina.* Currently, the control flow at Celina (combination discharges from Wolf Creek and Dale Hollow Dams' and the uncontrolled watershed between Celina and the dams) varies seasonally based on crop season (April 15th-December 15th) at 30,000 cubic feet per second (cfs) and flood season (December 15th-April 15th) at 40,000 cfs. The revised water control manual proposes a single control flow at Celina that would not vary seasonally and remain at 40,000 cfs year-round.

    - *Hydropower Ramp Rates.* Dale Hollow Dam has three hydropower units/turbines. The revised water control manual would limit the ramp up to one unit per hour and ramp down to two units per hour, under normal operating conditions. During a power emergency, a ramp up of two units per hour would be allowed.

    - *Turbine Discharge and Sluice Gate Supplementation*. Air supply valves connected to the turbine systems are typically utilized seasonally to improve dissolved oxygen when levels fall below the Tennessee Cold Water Aquatic Habitat standard of six milligrams per liter. If tailwater dissolved oxygen readings are still below the State standard, releases from other outlets, i.e. sluice gates, may be used to augment hydropower releases to potentially lessen environmental impacts downstream or provide additional discharge capacity.

    - *Minimum Flow*. Minimum flow is currently defined as the discharge equivalent of one hour of generation during every 48-hour period from June 1st through November 15th. This would be changed to one hour of generation per calendar day. The proposed change would not be utilized during flooding and would maintain zero discharge until flows downstream recede to appropriate levels.

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

Cultural Resources

TDEC believes the Draft EA adequately addresses potential impacts to cultural resources within the proposed project area.[2]

[2] 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.

Natural Resources

TDEC notes that several rare or state-listed species are currently known from the project's land holdings, including Aureolaria patula (Spreading False-foxglove), Eurybia schreberi (Schreber's Aster), Spiranthes lucida (Shining Ladies'-tresses), and Thuja occidentalis (Northern White Cedar). TDEC encourages USACE to acknowledge the presence of these taxa in the Final EA and incorporate measures into project operations and/or modifications to normal operations that identify actions that can be taken to avoid impacts to rare or state listed species.[3]

Water Resources

TDEC believes the Draft EA adequately addresses potential impacts to water resources and is supportive of the additional steps to improve dissolved oxygen during the June through September timeframe.

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,

Matthew Taylor
Senior Policy Analyst, Office of Policy and Sustainable Practices
Tennessee Department of Environment and Conservation
Matthew.K.Taylor@tn.gov
(615) 979-2449

cc: Tom Moss, TDEC, DWR
Daniel Brock, TDEC, DOA
David Withers, TDEC, DNA

[3] Several state-listed animals also are known from the project land holdings. TDEC encourages USACE to coordinate with the Tennessee Wildlife Resources Agency (Rob Todd, rob.todd@tn.gov, 615-781-6577) to ensure that legal requirements for protection of state listed rare animals are addressed. Additionally, we ask that you contact the U.S. Fish and Wildlife Service Field Office, Cookeville, Tennessee (931-525-4970) for comments regarding federally listed species.