



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

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

June 3, 2016

Via Electronic Mail to CorpsLRNPlanningPublicCom@usace.army.mil

Joy Broach

U.S. Army Corps of Engineers
Nashville District
Project Planning Branch
110 9TH Avenue South, Room A-405
Nashville, Tennessee 37203

Dear Joy Broach:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Army Corps of Engineers (Corps) *Draft Environmental Assessment for Maintenance Dredging and In-River Placement for Dredged River Sediment in Fort Loudoun Reservoir* (Draft EA) and *Finding of No Significant Impact* (FONSI). The applicant, Corps, proposes maintenance dredging of the federally authorized navigation channel located in Fort Loudoun Reservoir at Post Oak Island, between Tennessee River Miles 631 and 632. The dredged river sediment would be placed in-river behind Post Oak within the same river mile. The purpose of this project is to restore the navigation channel to a water depth of 11 feet at minimum winter pool elevation.

Actions considered in detail within the Draft EA include:

- Alternative A – No Action Alternative – Under the No Action Alternative, no maintenance dredging would be done. The federally authorized navigation channel would continue to fill with sediment, thus restricting channel depth and width.
- Alternative B – Proposed Action Alternative – Under the Proposed Action Alternative, Corps would use a clamshell dredge to dredge the river bottom and place channel sediment into spilt-hulled barges. The barges would then move to the in-river placement area for placement of dredged material. The dredge would grab sections of the river bottom in a grid pattern to maximize removal efficiency. This Alternative is estimated to take 30 to 60 days (6 to 8 weeks at 5 days per week) to complete.

TDEC's **Division of Natural Areas (DNA)** has reviewed the Draft EA with respect to rare plant species and critical habitat and, based on the lack of suitable habitat for state listed species or critical habitat within the project area, does not anticipate adverse impacts to rare species.

TDEC'S **Division of Water Resources (DWR)** has reviewed the Draft EA and has the following comments on the proposed action and its alternative:

- DWR comments that the dredge area exceeds the maximum allowable under the general permit and recommends that Corps mention the preparation of an application for an individual permit in the context of the Proposed Action Alternative in the Final EA.
- DWR concurs with the finding of no significant impact, but recommends that Corps seek out upland placement solutions for future maintenance dredging projects.

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,



Dr. Kendra Abkowitz
Director of Policy and Planning
Phone: (615)-532-8689

cc: Stephanie A. Williams, TDEC, DNA
James Sutherland, TDEC, DWR