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August 5, 2021

RE: TEC Comments regarding TNR100000 permit renewal

To Whom It May Concern:

Tennessee Environmental Council (TEC) opposes the proposed weakening of the "General NPDES Permit for Storm Water Discharges Associated with Construction Activity, Permit Number TNR100000." Our reasons for opposing these changes include the following:

- 1) Clean water is vital to the continued well-being of Tennessee residents and the ongoing economic prosperity of our state. The proposed changes endanger both of these essential qualities that make Tennessee an appealing place to live, work and enjoy.
- 2) TDEC itself, in Part 3 of the Rationale document, recognizes silt as "one of the primary pollutants in Tennessee waterways." It's undeniable that construction site stormwater discharges are a major source of pollution in developing parts of our state.
- 3) Silt pollution results in increased cost to Tennessee's public water supplies, impairment of habitat for fish and aquatic life, and degraded opportunities for boating and swimming.
- 4) No compelling rationale has been offered for weakening the current permit and the process for making these changes has not been transparent. Stakeholders advocating for these permit changes and their arguments have not been disclosed to the public. In the interest of transparency and sound public involvement in this important process, the public deserves to know what stakeholders are proposing the weakened permit criteria.

Feel free to contact me if you have any questions about TEC's comments and position on this important matter.

Sincerely,

Jeffrey Barrie, CEO

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Tennessee Environmental Council

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