



Sullivan County Soil Conservation District

3070 Highway 126, Suite B • Blountville, Tennessee 37617 • (423)323-7431 Ext. 3

July 1, 2015

Tennessee Department of Environment and Conservation
Division of Water Resources
William R. Snodgrass – Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, TN 37246

To Whom It May Concern:

The Sullivan County Soil Conservation District Board of Supervisors recently reviewed the Proposed Reissuance of Tennessee's Aquatic Resource Alteration General Permits regarding bank stabilization. We would like to address the following items listed under Special Conditions:

- **Item 1** – This item limits the length of bank stabilization to a maximum of 300' on one side, however, the Department of the Army Corps of Engineers 404 Nationwide permit states that 500' is the maximum length. We would like to propose that these numbers match, making the limit 500 feet.
- **Item 1b** – In the 2nd sentence of Item 1b, it states “any riprap or other hard armor associated with soil bioengineering techniques must be limited to the minimum height necessary to ensure toe protection and may not exceed 1/5 bank height.” It is our understanding, as per the Natural Resources Conservation Service engineering staff, that experts on streams provide guidance that at a minimum the structures should extend to the “bank-full flow, channel forming flow, or approximately the 2 year flow.” We would like to propose that the structures be allowed to extend to these terms, as determined by the engineer evaluating the site.
- **Item 2** – Item 2 refers to rock jetties and states that they must be anchored to only 1 bank. Because of the typical scenario in Tennessee, in which streams have become over-widened and severely eroded along both banks, the most reasonable solution would be to construct rock riprap weirs. This consist of using two jetties that are constructed from opposite banks that meet in the center of the stream. We would like to recommend that the structures be allowed to tie into both banks for this purpose.
- **Item 3** – This item limits the amount of in-stream structures to 3. Due to the varying degree of streams and their size, curvature, slope, locations of pools, riffles, etc., it seems as though a length limitation would be much more appropriate than this concrete number of structures.

- We would like to suggest that this statement be removed and replaced by the total project length limitation – 1,000’ for bioengineering projects.
- **Item 4** – Item 4 states that in-stream structures must be limited by 1/3 the width of the stream channel. The Natural Resources Conservation Service engineering staff has suggested that these structures should cross the thalweg at the very least, and that percentage varies widely depending on what is going on in the stream. We would like to propose that this item be deleted.
- **Item 5** – In this item, it is stated that geotextile prevents vegetation from becoming established. Many stabilization sites have been established through the various programs offered at the Sullivan County USDA Service Center, most of which consist of using geotextile fabric. In our experience with these projects, the geotextile does not prevent roots from penetrating, and most of these sites are covered with trees, shrubs, and native grasses. We would like to propose that geotextile be removed from this statement.
- **Item 6** – This item requires that heavy equipment be confined to the bank during construction of the stabilization structures. Due to the fact that many in-stream structures extend beyond the reach of the equipment when working from the top of the bank, we would like to recommend that this item be modified to allow equipment to work from temporary rock pads that will be removed upon completion of the work.
- **Item 9** – We would like to propose that this item be removed completely from the proposal. This item places so many restrictions that there are essentially no structures left that would be allowed to be used on a sizable eroded area on a scenic river.

Thank you for the opportunity to review and comment on the draft proposal. If you have any questions, please feel free to contact the Sullivan County Soil Conservation District Board of Supervisors at (423) 323-7431, extension 3.

Sincerely,



Dwight King, Chairman

Sullivan County Soil Conservation

From: [Wade Murphy](#)
To: [Jeanene Woodruff](#)
Cc: [Jimmy R. Smith](#)
Subject: FW: Ask TDEC Request 60698 Sullivan County SCD Response to TDEC Bank Stabilization
Date: Thursday, July 02, 2015 12:32:13 PM
Attachments: [SCD TDEC Letter.docx](#)

Jeanene, will you please see that the attached comments on an ARAP GP get directed to the appropriate permit file record and staff person? I appreciate it. I will send Ms. Kitchens a receipt acknowledgement.

Wade

From: Ask Tdec
Sent: Thursday, July 02, 2015 11:22 AM
To: Wade Murphy
Subject: Ask TDEC Request 60698 Sullivan County SCD Response to TDEC Bank Stabilization

Good Afternoon,

This e-mail was submitted to Ask.Tdec. Please review and respond appropriately for the Department.

Be sure to copy Ask.Tdec on your response and include Ask TDEC Request ID 60698 in the subject line.

Thank you,
Ask.TDEC

From: Kitchens, Allendre - NRCS - Blountville, TN [mailto:Allendre.Kitchens@tn.nacdnet.net]
Sent: Thursday, July 02, 2015 12:18 PM
To: Ask Tdec
Cc: Southern, Jordan - NRCS, Rogersville, TN; Dwight King (pking10105@aol.com)
Subject: Sullivan County SCD Response to TDEC Bank Stabilization

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To Whom it May Concern:

Please see the attached document. Sullivan County Soil Conservation District's addresses concerns about TDEC's modifications in stream bank stabilization.

Thank you,

Allendre Kitchens (Ali)

NRCS

Sullivan County Soil Conservation District

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