

Wednesday, February 23, 2022

Tennessee Department of Environment and Conservation
Division of Water Resources, Natural Resources Unit
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, TN 37243

attn: Meghan Ploch, Permit Coordinator

Applicant Name: Ford Motor Company
Project Name: Blue Oval City
Permit Number: NRS21.238

Summary: Altering streams by channelization and box culverts will increase volume, velocity and possible sedimentation of Little Muddy Creek that crosses my property North of the Rail/Convoy yards

Potential impacts to “Keeling Road Farm” Haywood Map 136 Parcel 014 (see map)
North of Streams 1-A, Stream 9, and Stream 2 “Exhibit 3” in Corps of Engineers notice

It is noted in the Corps of Engineers public notice that Streams 1-A, Stream 9, and Stream 2 will be channelized into approximately one mile of box culvert draining into “a straightened section of Stream 1-B that will extend 671 l.f. to the site’s northern property boundary”.

I own the property directly north, which consists of 250 acres prime agricultural land irrigated by pivot. Parts of Little Muddy Creek, a tributary of the Hatchie, meander through the east side. Virtually the entire rail spur/rail yard drainage flows through this property, so increased water flow in stream 1-A could impact me negatively, as these areas are low in elevation, and are beyond their capacity already. For reference, the bridge where Keeling Road crosses Little Muddy Creek (northeast corner of my property) floods frequently during heavy precipitation to the point where it is impassable. (please see attached photos, taken 2/22/2022, and map)

Increased water flow could cause my bottomland agricultural acreage to become un-plantable in a timely matter, and might also cause stream bank erosion of the existing meanders of Little Muddy Creek. We have spent a great deal of labor and money improving these acres within the past few years; they are under the coverage of a pivot irrigation system and are high-value investments which several families depend on for their income.

I do understand that stream 1-B currently drains the area in question south of me, but it drains permeable no-till fields which are terraced in the northwest quadrant and broken up by woodland swales which absorb a significant percentage of the precipitation in the event of heavy rainfall, and its meandering channel slows the water velocity. Paving, grading, and otherwise cladding the soil upstream of me will decrease water penetration and serve to increase the volume, speed and sedimentation of the mile-long culvert discharge of three combined streams (1-A, 2, and 9) which I and Little Muddy Creek are being asked to handle.

Lastly, part of my agricultural income is derived from hunting leases; approximately 65 acres of this property are devoted exclusively to this pursuit. Of the parcels I lease for hunting, this is the best property and garners the most income. This income helps justify maintaining the riparian buffers on the east side of the farm, which are vital for wildlife habitat as well as slowing water drainage into Little Muddy Creek as it flows north into the Hatchie River (Little Muddy remains meandering and unchannelized on my property). Active efforts to mitigate light, noise, and other pollution from Blue Oval

City would help ensure the viability of these habitats for hunting and the continued success of preservation efforts in the Hatchie River drainage basin.

Ford Motor Company has been responsive and encouraging regarding this situation, but I would request:

1. Further baseline studies be done to determine an average volume, velocity and sedimentation of Little Muddy Creek pre-construction, during construction, and after construction during stormwater events both at the outfall(s) onto my property and at the Little Muddy Creek/ Keeling Road juncture.
2. I would like to request additional information from Ford, SK, and Walbridge that might bear on these concerns, and be appraised in a timely manner of proposed plans and designs for stormwater buffering & runoff and how this might be monitored during the construction and operational phase of this project. This is especially important considering the speed of this development.

Thank you in advance,

Julian Williamson
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Attachments: •Photos of Little Muddy Creek during a rainfall event 2/22/2022 (road underwater)
•Map of Williamson Farms properties bordering Blue Oval City





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