



March 16, 2007 (via email)

Robbie Baker  
Tennessee Department of Environment and Conservation  
Division of Water Pollution Control – Natural Resource Section  
401 Church Street  
Nashville, TN

RE: Public Hearing 2007-05; TDEC NRS06.332; City of Franklin

Dear Mr. Baker,

On behalf of WWF's over 12,000 Tennessee members and our Southeast Rivers and Streams staff, I urge you to deny the City of Franklin's permit application #NRS06.332. These written comments are in addition to the comments I made at the Public Hearing referenced above.

I urge this denial because the Harpeth River and the species that live in it cannot tolerate this additional water withdrawal. One comment that truly struck home to me at the public hearing on March 8, 2007 was that in the 1950's when this water plant was built, Franklin was a small town on a small river. Today, Franklin is in the middle of, according to the US Census Bureau, one of the top 100 fastest growing counties in the United States. Yet, the river's size has not changed, nor will it. The Census Bureau also reports that the State of Tennessee's population will increase by nearly 1.5 million people by the year 2025 with 600,000 to 900,000 settling in middle Tennessee alone!

As you are well aware, population growth can bring economic prosperity and an increased quality of life. However, growth without sensible planning can also usher in a host of problems for both people and the environment they depend on. We must be more intelligent in our use of resources than we have been in the past. It is my belief that state government and TDEC in particular needs to take a leadership role in promoting, developing and enforcing regional water policies for our communities.

Tennessee is blessed with beautiful rivers and streams rich in aquatic life. The Harpeth River is one of those treasures, still diverse and a source for fishing, canoeing and other recreation activities. We cannot continue to dole out permits one city at a time. It is past time for watershed wide permitting and it is past time for regional water supply planning and implementation. The Department has the authority and while I recognize these issues are not your particular purview; this ARAP permit loudly illustrates the need for the state's leadership on regional approaches, which is why I am copying this letter to Mr. Davis and Mr. Sloan.

As for the biological impacts to the river, WWF agrees with Steve Alexander, ecologist for the US Fish and Wildlife Service's Cookeville office, assessment in a letter sent to you on March 15 2007, quoted here:

We are concerned that increasing the current rate of water withdrawal from 7.2 to 11.2 million gallons per day (MGD) by the City of Franklin will exacerbate depressed dissolved oxygen levels and degraded habitat conditions in the river. Due to the significant growth in the Franklin area, the potential for increases in the discharge of treated wastewaters and associated effects on water quality in the Harpeth River must be carefully considered. Previous assessments have demonstrated that treated effluent

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may comprise as much as 73% of the base flow in the river during seasonally low flow periods. We also believe that existing in-stream structures, such as the low-head dam where the existing withdrawal is located, also contribute to depressed oxygen levels and flows in the river. This structure serves as an impediment to fish movement in this reach of the river and contributes to reduced biological integrity.

Since the Harpeth River is currently assessed as partially supporting its designated use of fish and aquatic life due to low dissolved oxygen and other factors, we believe it would be prudent to further evaluate previous modeling efforts by EPA, USGS and TDEC and determine whether the data utilized in those efforts remain valid. The degraded water quality conditions in the river have strongly influenced the aquatic communities and available habitat in the river for a considerable distance downstream. Available data on the aquatic communities is also limited and further assessments of biological integrity appear to be warranted. Additional analysis and modeling of the hydrologic regime in this reach of the river is also warranted.

As a result of these biological impacts as well as the urgent need for a more regional approach to water supply in the state of Tennessee, I urge you to deny the City of Franklin's permit application to expand its drinking water plant. I further urge the department to work with the City of Franklin to create a plan to close the drinking water plant and remove the dam that is associated with the plant. The alternative is one that the City already employs for most of its drinking water, piping water from the Cumberland River.

Although the Harpeth River has been degraded, it is still extremely biologically diverse, as is typical of the rivers and streams of the Southeast. For example, small-scale darters can be found in the mainstem of the river in downtown Franklin. In North America, no ecoregion has a greater diversity of aquatic life than the Southeast Rivers and Streams ecoregion.

The Harpeth River needs to be protected and restored and World Wildlife Fund's Southeast Rivers and Streams Program staff would be happy to assist the department, the City of Franklin and others in developing a plan that can be a positive example for how to plan for regional water needs while protecting and restoring the biological diversity of our rivers and streams for future generations of Tennesseans to enjoy. Thanks for considering these comments and I look forward to the Department's decision in this matter.

Kind Regards,



Wendy Smith, Director

Copied via email to Paul Sloan and Paul Davis