



Nathan Fronk, District Engineer
US Army Corps of Engineers
Philadelphia District
Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107

July 22, 2020

Comment on Public Notice CENAP-OP-R-2019-00070

Submitted via E-mail to PhiladelphiaDistrictRegulatory@usace.army.mil

Dear Mr. Fronk:

Pursuant to the above-referenced US Army Corps of Engineers' (USACE) Public Notice dated July 1, 2020, Schuylkill River Greenways is respectfully submitting the following comments related to the planned removal of the New Kernsville Dam by the Pennsylvania Department of Environmental Protection (DEP):

- The proposed project will affect the permanent flow dynamics of the Schuylkill River, and includes modifications to a Class B, High-Hazard (Category 1) dam structure. Acknowledging the environmental and safety benefits associated with the removal of the dam, SRG also understands USACE's role in evaluating the cumulative effects of waterways projects as part of its permitting process. As stated in the Public Notice, these include (but are not limited to) factors such as environmental concerns, fish and wildlife habitat, flood hazards, erosion and sedimentation, water quality, and public safety. As such, and in light of the significant scope and effects of this project, SRG is requesting confirmation that the USACE will require DEP to meet the conditions of an Individual Permit pursuant to 33 CFR 325.1(d).
- Individual Permits submitted to USACE for review are required to include a detailed project narrative describing the anticipated temporary or permanent impacts, both direct and indirect, to regulated aquatic resources. SRG is requesting that this narrative be a requirement of DEP's permit application, and that this document be provided for public review and comment when available.
- DEP's General Plan Sheet (Drawing GP-1) provides a brief summary of the planned sequence of reservoir drawdown through an initial spillway notch and the subsequent controlled removal of additional spillway sections. This and other Plan Sheets provided with the Public Notice provide only tabular summaries of river discharge data for storm probability/recurrence intervals between 10 and 500 years, with no further supporting narrative. SRG is therefore requesting confirmation from USACE that DEP will be required to provide a supplemental Hydrologic and Hydraulics (H&H) Analysis report justifying the planned breach and drawdown design. An H&H Analysis would typically be required for a DEP Chapter 105/USACE Section 404 permitting project of this type, and should include detailed routing,

water surface profile modeling, and demonstrations that the hydrologic and hydraulic conditions encountered during the project will be properly managed by the construction sequence. The hydraulic analysis should be supported by modeling using HEC-RAS or an equivalent application capable of analyzing steady- and unsteady-flow simulations.

- We understand that a Compensatory Mitigation element may not be required since the project's end goal is the enhancement of aquatic resources. However, USACE's Individual Permit review checklist includes the requirement for a Mitigation Plan, which describes how the new hydrologic and vegetative conditions created by the project will continue to support the function and values of the affected riverine and wetland aquatic habitats. SRG is requesting confirmation that a Mitigation Plan will be a part of the required elements of DEP's permit application.
- SRG is recommending that riverbank and water quality monitoring be conducted downstream of the project area during the construction phase, and on a periodic basis following project completion. Post-completion monitoring should include inspections during and following storm events. Downstream monitoring should include, at a minimum, visual inspections for erosion or sediment deposition, and in-situ field testing for critical water quality parameters such as turbidity, temperature, dissolved oxygen, and conductivity.
- SRG requests clarification and confirmation that under the new post-dam conditions the river will be suitable for recreational use via kayak without portage. In addition, SRG requests any planning or design regarding the project's impact on existing kayak launch sites and consideration of any new access site(s).
- As described in the Public Notice, prior to dam removal DEP will conduct hydraulic dredging involving the removal of approximately 80,000 cubic yards of accumulated sediment. This material will be piped one mile to the southeast to be deposited in an existing disposal basin. SRG requests a detailed description of the method and route of this piping operation and any planned or possible intrusion or encroachment on, by or over the Schuylkill River Trail. Should the dredging operation anticipate any such encroachment, SRG requests timely notification and consultation regarding the planning.

Thank you for your consideration,



Elaine Paul Schaefer
Executive Director