



April 12, 2019

Mr. Robert Karesh
Tennessee Department of Environment and Conservation
Division of Water Resources
Nashville Environmental Field Office
711 R. S. Gass Boulevard
Nashville, TN 37216
Delivered via email to: Robert.Karesh@tn.gov

Dear Mr. Karesh:

Subject: City of Berry Hill MS4 Program Audit Response
NPDES Tracking No. TNS075167
CEC Project 040-559

Civil & Environmental Consultants, Inc. (CEC), on behalf of the City of Berry Hill, is pleased to provide the following response to your March 8, 2019 MS4 Program audit letter. The five required actions and the responses to them are listed below in *italics*:

- 1) Documenting annual evaluations of program effectiveness and the need for improvement.

Response: Each year the City meets with their consulting engineer to discuss the City's progress toward achieving the six minimum control measures of the MS4 permit through the various BMPs listed in the Notice of Intent. The City will evaluate the effectiveness of the public education and outreach activities and need for improvement at this meeting and document the items considered in the evaluation and results. A standard meeting template with specific education effectiveness related questions will also be developed to help guide these annual meetings. This documentation will be included in the 2018/2019 Permit Year annual report and subsequent annual reports.

- 2) Development and implementation of methods for promoting public participation in stormwater-related events and opportunities for involvement.

Response: Berry Hill currently has several strategically located "Mutt Mitt" dispensers throughout the City to facilitate pet waste pick up. This information was inadvertently not provided during the audit. In addition to this, the City plans to join the Tennessee Stormwater Association (TNSA) in July 2019 and participate financially in TNSA's social media campaign. The City will also begin in July 2019 evaluating opportunities in the surrounding communities and posting these to the City's social media page as appropriate.

- 3) Revising the City's stormwater ordinance to clarify that it applies to all construction activities that result in land disturbance of greater than or equal to one acre, or less than one acre if part of a larger common plan of development.

Response: The City plans to prepare a revised stormwater ordinance to address this comment. The tentative schedule for this revision is to have the first reading of the proposed ordinance at the May 2019 commissioners' meeting and second reading at the June 2019 meeting.

- 4) Revising the City's stormwater ordinance to remove discretionary exemptions.

Response: The City plans to prepare a revised stormwater ordinance to address this comment. The tentative schedule for this revision is to have the first reading of the proposed ordinance at the May 2019 commissioners' meeting and second reading at the June 2019 meeting.

- 5) Revising plans review documentation to include all procedures and CGP technical standards.

Response: The City plans to revise the Land Disturbance Permit application form and checklists, as appropriate, to address this comment. The City proposes to complete this simultaneously with the revised stormwater ordinance.

Please let us know if you have any questions about the responses to the audit comments, and thank you for the education you provided about MS4 Programs during the audit.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Steven E. Casey, P.E., CPESC
Senior Principal

cc: Mr. Joe Baker, City of Berry Hill