



Tennessee Department of Environment and Conservation
 Division of Water Resources
 William R. Snodgrass Tennessee Tower,
 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243
 1-888-891-8332 (TDEC)

Phase II Small Municipal Separate Storm Sewer System (MS4) Annual Report

1. MS4 Information

Name of MS4: Belle Meade		MS4 Permit Number: TNS075159
Contact Person: Larry Smith		Email Address: lsmith@citybellemeade.org
Telephone: (615) 297-6041		MS4 Program Web Address: http://www.citybellemeade.org/stormwater
Mailing Address: 4705 Harding Road		
City: Nashville	State: TN	ZIP code: 37205

What is the current population of your MS4? 3,300

What is the reporting period for this annual report? July1 2017 to June 30 2018

2. Discharges to Waterbodies with Unavailable Parameters or Exceptional Tennessee Waters (Section 3.1)

- A. Does your MS4 discharge into waters with unavailable parameters (previously referred to as impaired) for pathogens, nutrients, siltation or other parameters related to stormwater runoff from urbanized areas as listed on TN's most current 303(d) list and/or according to the on-line state GIS mapping tool (tdeconline.tn.gov/dwr/)? If yes, attach a list. Yes No
- B. Are there established and approved TMDLs (<http://www.tn.gov/environment/article/wr-ws-tennessees-total-maximum-daily-load-tmdl-program>) with waste load allocations for MS4 discharges in your jurisdiction? If yes, attach a list. Yes No
- C. Does your MS4 discharge to any Exceptional Tennessee Waters (ETWs - http://environment-online.tn.gov:8080/pls/enf_reports/f?p=9034:34304:4880790061142)? If yes, attach a list. Yes No
- D. Are you implementing specific Best Management Practices (BMPs) to control pollutant discharges to waterbodies with unavailable parameters or ETWs? If yes, describe the specific practices: Public education at Belle Meade County Club targeting Richland Creek (TN05130202314 3000) resulted in the installation of a sealed system to deal with excess nutrients. Newsletter articles about not disposing of landscape debris in streams and channels also help to target nutrient pollution. Yes No

3. Public Education/Outreach and Involvement/Participation (Sections 4.2.1 and 4.2.2)

- A. Have you developed a Public Information and Education plan (PIE)? Yes No
- B. Is your public education program targeting specific pollutants and sources, such as Hot Spots? If yes, describe the specific pollutants and/or sources targeted by your public education program: The City approach targets two main audiences: the development community (contractors, architects, engineers) and residents. For sediment and other construction-related potential pollution, the City educates contractors during the land disturbance permit process. The monthly City newsletter includes stormwater-related topics for residential education for at least 2 months per year. Yes No

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C. Do you have a webpage dedicated to your stormwater program? If yes, provide a link/URL: <http://www.citybellemeade.org/stormwater> Yes No

D. Summarize how you advertise and publicize your public education, outreach, involvement and participation opportunities: The City uses emails and the newsletter to announce stormwater related events or meetings. The City's website is used to advertise public involvement opportunities such as commissioner meetings.

E. Summarize the public education, outreach, involvement and participation activities you completed during this reporting period:

Public education at Belle Meade County Club targeting Richland Creek (TN05130202314 3000) resulted in the installation of a sealed system to deal with excess nutrients.

The monthly newsletter contained several stormwater-related articles this year including: October 2017 (landscape debris and yard waste proper disposal), January 2018 (Weed Wrangle event and stormwater infrastructure improvement project advertised), February 2017 (Weed Wrangle event advertised), March 2017 (proper pool and spa draining rules).

The City website update was completed in August 2017.

The City held a public meeting to demonstrate the new website for engineers and the development community on January 25, 2018.

F. Summarize any specific successful outcome(s) (e.g., citizen involvement, pollutant reduction, water quality improvement, etc.) fully or partially attributable to your public education and participation program during this reporting period:

Public education at Belle Meade County Club targeting Richland Creek (TN05130202314 3000) resulted in the installation of a sealed system to deal with excess nutrients.

There were approximately 10 stormwater related calls. Two examples were stormwater complaints at Stones Throw Condominiums and 503 Lynnwood. Both of these incidences were able to be resolved after the stormwater complaint was received and verified demonstrating public awareness of whom to call with stormwater issues.

4. Illicit Discharge Detection and Elimination (Section 4.2.3)

A. Have you developed and do you continue to update a storm sewer system map that shows the location of system outfalls where the municipal storm sewer system discharges into waters of the state or conveyances owned or operated by another MS4? Yes No

B. If yes, does the map include inputs into the storm sewer collection system, such as the inlets, catch basins, drop structures or other defined contributing points to the sewershed of that outfall, and general direction of stormwater flow? Yes No

C. How many outfalls have you identified in your storm sewer system? 60

D. Do you have an ordinance, or other regulatory mechanism, that prohibits non-stormwater discharges into your storm sewer system? Yes No

E. Have you implemented a plan to detect, identify and eliminate non-stormwater discharges, including illegal disposal, throughout the storm sewer system? If yes, provide a summary: Once per permit cycle the outfalls are screened for illicit discharges. Staff have been educated on illicit discharges and inspect them on a daily basis during normal activities. Yes No

F. How many illicit discharge related complaints were received this reporting period? 1

G. How many illicit discharge investigations were performed this reporting period? 1

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H. Of those investigations performed, how many resulted in valid illicit discharges that were addressed and/or eliminated? 1

5. Construction Site Stormwater Runoff Pollutant Control (Section 4.2.4)

- A. Do you have an ordinance or other regulatory mechanism requiring:
- | | | |
|---|---|-----------------------------|
| Construction site operators to implement appropriate erosion prevention and sediment control BMPs consistent with those described in the TDEC EPSC Handbook? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Construction site operators to control wastes such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Design storm and special conditions for unavailable parameters waters or Exceptional Tennessee Waters consistent with those of the current Tennessee Construction General Permit (TNR100000)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
- B. Do you have specific procedures for construction site plan (including erosion prevention and sediment BMPs) review and approval? Yes No
- C. Do you have sanctions to enforce compliance? Yes No
- D. Do you hold pre-construction meetings with operators of priority construction activities and inspect priority construction sites at least monthly? Yes No
- E. How many construction sites disturbing at least one acre or greater were active in your jurisdiction this reporting period? 7
- F. How many active priority and non-priority construction sites were inspected this reporting period? 15
- G. How many construction related complaints were received this reporting period? 2

6. Permanent Stormwater Management at New Development and Redevelopment Projects (Section 4.2.5)

- A. Do you have a regulatory mechanism (e.g. ordinance) requiring permanent stormwater pollutant removal for development and redevelopment projects? If no, have you submitted an Implementation Plan to the Division? Yes No
 Yes No
- B. Do you have an ordinance or other regulatory mechanism requiring:
- | | | |
|---|---|-----------------------------|
| Site plan review and approval of new and re-development projects? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| A process to ensure stormwater control measures (SCMs) are properly installed and maintained? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| Permanent water quality riparian buffers? If yes, specify requirements: <u>See attached</u> | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
- C. What is the threshold for development and redevelopment project plans plan review (e.g., all projects, projects disturbing greater than one acre, etc.)? See attached
- D. How many development and redevelopment project plans were reviewed for this reporting period? 25
- E. How many development and redevelopment project plans were approved? 13
- F. How many permanent stormwater related complaints were received this reporting period? 2
- G. How many enforcement actions were taken to address improper installation or maintenance? 0
- H. Do you have a system to inventory and track the status of all public and private SCMs installed on development and redevelopment projects? Yes No

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- I. Does your program include an off-site stormwater mitigation or payment into public stormwater fund? If yes, specify. _____ Yes No

7. Stormwater Management for Municipal Operations (Section 4.2.6)

- A. As applicable, have stormwater related operation and maintenance plans that include information related to maintenance activities, schedules and the proper disposal of waste from structural and non-structural stormwater controls been developed and implemented at the following municipal operations:

Streets, roads, highways? Yes No

Municipal parking lots? Yes No

Maintenance and storage yards? Yes No

Fleet or maintenance shops with outdoor storage areas? Yes No

Salt and storage locations? Yes No

Snow disposal areas? Yes No

Waste disposal, storage, and transfer stations? Yes No

- B. Do you have a training program for employees responsible for municipal operations at facilities within the jurisdiction that handle, generate and/or store materials which constitute a potential pollutant of concern for MS4s? Yes No

If yes, are new applicable employees trained within six months, and existing applicable employees trained and/or retrained within the permit term? Yes No

8. Reviewing and Updating Stormwater Management Programs (Section 4.4)

- A. Describe any revisions to your program implemented during this reporting period including but not limited to:

Modifications or replacement of an ineffective activity/control measure. None

Changes to the program as required by the division to satisfy permit requirements. N/A

Information (e.g. additional acreage, outfalls, BMPs) on newly annexed areas and any resulting updates to your program. None - annexation is not applicable for the City due to Metro Nashville charter

- B. In preparation for this annual report, have you performed an overall assessment of your stormwater management program effectiveness? If yes, summarize the assessment results, and any modifications and improvements scheduled to be implemented in the next reporting period. The City is planning revisions to the PIE plan this coming year as well based on past experience targeting the permit-required audiences. The storm sewer input map is being continually updated as new developments are completed. The stormwater input and outfall map was updated. An ordinance revision may be initiated to address other permanent stormwater requirements after the pending appeals are heard in October 2018 and additional guidance is provided by TDEC. Stream cleanup and street sweeping operations continued through Permit Year 2 and are documented in the City's stormwater Evernote account. The topic of evaluation methods for new and existing flood management projects was discussed at a May 8, 2018 meeting at City Hall. The understanding going forward is that proposed projects that seek to mitigate flooding will be reviewed on a case-by-case basis during the course of pre-application meetings and the site plan review process. Water quality improvement measures will be discussed among the design engineer, consultant reviewing engineer, and City manager and recommended as appropriate.

Yes

No

9. Enforcement Response Plan (Section 4.5)

- A. Have you implemented an enforcement response plan that includes progressive enforcement actions to address non-compliance, and allows the maximum penalties specified in TCA 68-221-1106? If no, explain. _____ Yes No
- B. As applicable, identify which of the following types of enforcement actions (or their equivalent) were used during this reporting period; indicate the number of actions, the minimum measure (e.g., construction, illicit discharge, permanent stormwater management), and note those for which you do not have authority:

<u>Action</u>	<u>Construction</u>	<u>Permanent Stormwater</u>	<u>Illicit Discharge</u>	<u>In Your ERP?</u>	
Verbal warnings	# <u>1</u>	# <u>0</u>	# <u>3</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Written notices	# <u>1</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Citations with administrative penalties	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Stop work orders	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Withholding of plan approvals or other authorizations	# <u>0</u>	# <u>0</u>	# <u>0</u>	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Additional Measures	# <u>0</u>	# <u>0</u>	# <u>0</u>	Describe: <u>N/A</u>	

- C. Do you track instances of non-compliance and related enforcement documentation? Yes No
- D. What were the most common types of non-compliance instances documented during this reporting period?
Construction related complaints.

10. Monitoring, Recordkeeping and reporting (Section 5)

- A. Summarize any analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. N/A
- B. Summarize any non-analytical monitoring activities (e.g., planning, collection, evaluation of results) performed during this reporting period. N/A
- C. If applicable, are monitoring records for activities performed during this reporting period submitted with this report. Yes No

11. Certification

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This report must be signed by a ranking elected official or by a duly authorized representative of that person. See signatory requirements in sub-part 6.7.2 of the permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Robert F. Weigel, Vice Mayor
Printed Name and Title


Signature

9/28/18
Date

Annual reports must be submitted by September 30 of each calendar year (Section 5.4) to the appropriate Environmental Field Office (EFO), identified in the table below:

EFO	Street Address	City	Zip Code	Telephone
Chattanooga	1301 Riverfront Pkwy, Suite 206	Chattanooga	37402	(423) 634-5745
Columbia	1421 Hampshire Pike	Columbia	38401	(931) 380-3371
Cookeville	1221 South Willow Ave.	Cookeville	38506	(931) 520-6688
Jackson	1625 Hollywood Drive	Jackson	38305	(731) 512-1300
Johnson City	2305 Silverdale Road	Johnson City	37601	(423) 854-5400
Knoxville	3711 Middlebrook Pike	Knoxville	37921	(865) 594-6035
Memphis	8383 Wolf Lake Drive	Bartlett	38133	(901) 371-3000
Nashville	711 R S Gass Boulevard	Nashville	37216	(615) 687-7000

ATTACHMENTS

**Section 2.A. - List of Waters with Unavailable Parameters in Jurisdiction Based on TDEC Viewer
as of August 2017**

Waterbody Name	Waterbody Description	Waterbody I.D. #	Cause(s)	Source Name(s)
Richland Creek	Briley Parkway to Jocelyn Hollow Branch	TN05130202314_2000	Other anthropogenic substrate alterations	Municipal (Urbanized High Density Area)
			<i>Escherichia coli</i>	Sanitary Sewer Overflows (Collection System Failures)
			Phosphorus (Total)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Nitrate/Nitrite (Nitrite + Nitrate as N)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
Richland Creek	Jocelyn Hollow Branch to headwaters	TN05130202314_3000	Phosphorus (Total)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Nitrate/Nitrite (Nitrite + Nitrate as N)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Other anthropogenic substrate alterations	Municipal (Urbanized High Density Area)
			<i>Escherichia coli</i>	Discharges from Municipal Separate Storm Sewer Systems (MS4)
Sugartree Creek	Richland Creek to headwaters	TN05130202314_0400	<i>Escherichia coli</i>	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Phosphorus (Total)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Oxygen, Dissolved	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Other anthropogenic substrate alterations	Municipal (Urbanized High Density Area)
			Nitrate/Nitrite (Nitrite + Nitrate as N)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
Jocelyn Hollow Branch	Richland Creek to headwaters	TN05130202314_0800	<i>Escherichia coli</i>	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Nitrate/Nitrite (Nitrite + Nitrate as N)	Discharges from Municipal Separate Storm Sewer Systems (MS4)
			Phosphorus (Total)	Discharges from Municipal Separate Storm Sewer Systems (MS4)

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Section 2.B. TMDLs with Waste Load Allocations for MS4 Discharges

Summary (cont'd) of TMDLs, WLAs, & LAs expressed as daily loads for Impaired Waterbodies in the Lower Cumberland Watershed (HUC 05130202)

HUC-12 Subwatershed (05130202___) or Drainage Area (DA)	Impaired Waterbody Name	Impaired Waterbody ID	TMDL	MOS	WLAs			LAs
					WWTFs ^a	Leaking Collection Systems	MS4s	
					[CFU/day]	[CFU/day]	[CFU/day/acre]	
0105	Earthman Fork	TN05130202010 – 0400	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	5.158 x 10 ⁶ * Q	5.158 x 10 ⁶ * Q
	Ewing Creek	TN05130202010 – 0800	1.20 x 10 ¹⁰ * Q	1.20 x 10 ⁹ * Q	NA	0	1.273 x 10 ⁶ * Q	1.273 x 10 ⁶ * Q
	Little Creek	TN05130202010 – 0700	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	6.263 x 10 ⁶ * Q	6.263 x 10 ⁶ * Q
	Whites Creek	TN05130202010 – 1000	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	5.251 x 10 ⁵ * Q	5.251 x 10 ⁵ * Q
0106	Bosley Springs Branch	TN05130202314 – 0300	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	1.434 x 10 ⁷ * Q	1.434 x 10 ⁷ * Q
	Jocelyn Hollow Branch	TN05130202314 – 0800	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	1.249 x 10 ⁷ * Q	1.249 x 10 ⁷ * Q
	Murphy Road Branch	TN05130202314 – 0200	1.20 x 10 ¹⁰ * Q	1.20 x 10 ⁹ * Q	NA	0	2.166 x 10 ⁷ * Q	2.166 x 10 ⁷ * Q
	Richland Creek	TN05130202314 – 1000	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	1.214 x 10 ⁶ * Q	1.214 x 10 ⁶ * Q
	Richland Creek	TN05130202314 – 2000	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	7.055 x 10 ⁵ * Q	7.055 x 10 ⁵ * Q
	Richland Creek	TN05130202314 – 3000	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	1.605 x 10 ⁶ * Q	1.605 x 10 ⁶ * Q
	Sugartree Creek	TN05130202314 – 0400	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	6.917 x 10 ⁶ * Q	6.917 x 10 ⁶ * Q
	Unnamed Tributary to Richland Creek	TN05130202314 – 0100	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	1.457 x 10 ⁸ * Q	1.457 x 10 ⁸ * Q
0201	Vaughns Gap Branch	TN05130202314 – 0700	1.20 x 10 ¹⁰ * Q	1.20 x 10 ⁹ * Q	NA	0	5.950 x 10 ⁶ * Q	5.950 x 10 ⁶ * Q
	Vaughns Gap Branch	TN05130202314 – 0750	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	1.140 x 10 ⁷ * Q	1.140 x 10 ⁷ * Q
0201	Mill Creek	TN05130202007 – 5000	1.20 x 10 ¹⁰ * Q	1.20 x 10 ⁹ * Q	NA	0	4.876 x 10 ⁵ * Q	4.876 x 10 ⁵ * Q
0202	Finley Branch	TN05130202007 – 0300	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	5.951 x 10 ⁷ * Q	5.951 x 10 ⁷ * Q
	Mill Creek	TN05130202007 – 3000	1.20 x 10 ¹⁰ * Q	1.20 x 10 ⁹ * Q	NA	0	2.467 x 10 ⁵ * Q	2.467 x 10 ⁵ * Q
	Pavillion Branch	TN05130202007 – 1500	2.30 x 10 ¹⁰ * Q	2.30 x 10 ⁹ * Q	NA	0	3.685 x 10 ⁷ * Q	3.685 x 10 ⁷ * Q

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Section 2.C. - List of Exceptional Tennessee Waters (ETWs) to which the MS4 discharges

Waterbody Name	Waterbody Description	HUC	Reason for Inclusion
Jocelyn Hollow Branch	Portion in Belle Meade Mansion State Historic Area	05130202	Belle Meade Mansion State Historic Area
Richland Creek Unnamed Tributary	Headwater tributary of Richland Creek from mouth to origin	05130202	State threatened Water Stitwort
Richland Creek	From just D/S of The Temple (5015 Harding Pike) to upstream boundary of Belle Meade Mansion State Historic Area	05130202	Belle Meade Mansion State Historic Area and State threatened Water Stitwort

Section 6.B. – Water Quality Riparian Buffer Requirements

12-209. Water quality buffers. (1) Scope. A water quality buffer shall be established, protected, and maintained along all community waters in areas of new development and redevelopment for which a land disturbance permit, as defined in § 12-205, is required in accordance with Table 3 or Table 4 below, as applicable. The goal of the water quality buffer is to preserve undisturbed vegetation that is native to the streamside habitat in the area of the project. Vegetated, preferably native, water quality buffers protect water bodies by providing structural integrity and canopy cover, as well as stormwater infiltration, filtration and evapotranspiration.

Section 6.B. (con't) – Water Quality Riparian Buffer Requirements

Change 6, April 27, 2016

12-36

Table 3 - Water Quality Buffer Requirements for Sites That Disturb <1 acre (no CGP coverage required)		
Community water characteristics	Permanent buffer	During construction (temporary) buffer
All community waters	20-feet (City-approved buffer enhancement plan required for temporary buffer encroachment)	20-feet (City-approved buffer enhancement plan required for temporary buffer encroachment)

Table 4-Water Quality Buffer Requirements for Sites That Require CGP Coverage		
Community water characteristics	Permanent buffer	During construction (temporary) buffer
Community water drainage area <1 square mile and <u>not</u> designated as impaired or an Exceptional Tennessee Water (ETW)	30-feet	30-feet (Can be established on an average basis as long as minimum is 15-feet. City approved buffer enhancement plan required for CGP-allowable, temporary buffer encroachment.)
Community water drainage area <1 square mile and designated as impaired or an Exceptional Tennessee Water (ETW)	30-feet	60-feet (Can be established on an average basis as long as minimum is 30-feet.)
Community water drainage area >1 square mile and <u>not</u> designated as impaired or an Exceptional Tennessee Water (ETW)	60-feet (Can be established on an average basis as long as minimum is 30-feet.)	30-feet (Can be established on an average basis as long as minimum is 15-feet. City approved buffer enhancement plan required for CGP-allowable, temporary buffer encroachment.)
Community water drainage area >1 square mile and designated as impaired or an Exceptional Tennessee Water (ETW)	60-feet (Can be established on an average basis as long as minimum is 30-feet.)	60-feet (Can be established on an average basis as long as minimum is 30-feet.)
Note: "Impaired" refers to community water that is impaired for siltation and habitat alteration.		

Section 6.C. – Water Quality Riparian Buffer Requirements

(2) Land development. This section shall be applicable to all land development, including, but not limited to, site plan applications, subdivision applications, and land disturbance applications. These standards apply to any new development or redevelopment site according to Table 1 below:

Change 6, April 27, 2016

12-17

Table 1 - Land Disturbance Permit (LDP)					
Total Disturbed area	LDP Required?	City forms/checklists to complete	Stormwater Management Plan required?	Construction General Permit (CGP) coverage required?	Water Quality Buffer Required?
<10,000 ft	No	None	No	No	No
10,000 ft ² - 0.99 acre	Yes	General, Checklist 1-3	Yes; See Checklist 3 and Table 2	No	See Table 3
1 acre or more	Yes	General, Checklist 1-3	Yes; See Checklist 3 and Table 2	Yes	See Table 4