

**ADMINISTRATION**

**Mark Hilty**  
Assistant City Administrator  
Public Works



**Dr. Ken Moore**  
Mayor

**Eric S. Stuckey**  
City Administrator

January 18, 2018

HISTORIC  
**FRANKLIN**  
TENNESSEE

Jennifer Dodd  
Deputy Director  
Division of Water Resources  
TN Department of Environment and Conservation  
William R. Snodgrass TN Tower, 11th Floor  
312 Rosa L. Parks Ave.  
Nashville, TN 37243

RE: Harpeth River TMDL Sampling and Work Plans

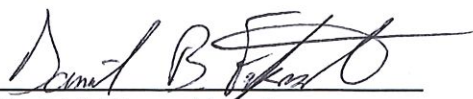
Dear Ms. Dodd,

Harpeth Conservancy and the City of Franklin are writing to request that formal sampling and workplans be established for the Harpeth River TMDL. While the process to date has been established, we believe all parties would benefit from documentation outlining the processes being used. This may also facilitate participation of other entities.

There are various workplans that may benefit the process, including protocols for data collection, a timeline for key phases, and a process for proposing and evaluating additional data needs. These plans would improve coordination of sample collection and aid budgeting decisions for the collection of new data. For example, an inventory of available data (existing monitoring by USGS, permittees, MS4s, etc.) and whether it has been submitted to EPA could aid stakeholders in helping identify and enter additional sources for submission. A formal peer-review process overseen by TDEC, with a clear timeline and criteria for decisions, would facilitate discussion of sampling and modeling decisions and provide a platform for raising concerns. A written record will also provide a clear way for stakeholders to understand which data are contributing to the model and who is participating, highlighting the significant effort expended by the group.

Given the limited timeframe, we support sampling for 2018 continuing as discussed during the last TMDL meeting until formal sampling and workplans are created. We are willing to assist as our resources allow and look forward to continuing to work together to improve water quality in the Harpeth River. We thank both TDEC and EPA for their guidance and facilitation of the TMDL process, and hope that this suggestion will improve communication and efficiency.

Sincerely,

  
Daniel B. Fitzgerald, Ph.D.  
Director, Science & Restoration  
Harpeth Conservancy

  
Mark Hilty  
Assistant City Administrator, Public Works  
City of Franklin