Municipality/Organization: Town of Dedham

EPA NPDES Permit Number: MAR041033

MassDEP Transmittal Number: W- 040861

Annual Report NumberYear 14& Reporting Period:April 1, 2017 – March 31, 2018

NPDES PII Small MS4 General Permit Annual Report (Due: May 1, 2017)

Part I. General Information

Contact Person: Virginia LeClair	Title:	Environmental Coordinator
Telephone #: 781-751-9213 ma.gov		Email: vleclair@dedham-
Mailing Address: Dedham Town Hall 26 Bryant Stree	et Dedh	am MA

Mailing Address: Dedham Town Hall, 26 Bryant Street, Dedham, MA 02026

Certification:

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.

Signature:

Printed Name: Jim Kern

Title: Town Manager

Date: May 1, 2017

Part II. Self-Assessment

The Town of Dedham has completed the required self-assessment and has determined that our municipality is in compliance with all permit conditions.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities
1a	Establish an Advisory Committee	Town Administration	Form a Committee	The Town Administrator utilized the monthly Department Head meeting and weekly Operations meeting to update and discuss stormwater issues on a regular basis with staff.	Continue with monthly Department Head meetings and weekly Operations meetings. In addition the Conservation Agent, Eng. Director and Env. Coordinator attends quarterly meetings with NepRWA and surrounding communities regarding stormwater management as part of a Neponset Valley Stormwater Managers group.
1b Revised planned activities	Submit 2 press releases	Environmental	Reach thousands of residents	Information was posted on the Town's website and MWRA Dwayne the Stormdrain coloring books, supplied free of charge by DWWD were given out at the Farmer's Market, Dedham Green Fair, Dedham Trails Day and other events along with water saving devices.	The Environmental Coordinator will utilize the Neponset River Watershed Association MS4 Outreach materials as part of a regional education and outreach campaign to increase awareness regarding ways to prevent water pollution. The catch phrase of the program is "Clean Streets, Clean Water". NepRWA will supply various forms of print material (postcards, posters, flyers, bookmarks, brochures etc) as well as a website that can be used by several communities to educate residents about stormwater pollution.
1c	Post article on town website	Engineering/Environmental	Reach thousands of web browsers	The Town posted information on the Environmental Dept page	The Town will continue to post our General Permit, as well as

				about the current General Permit and the previous year's annual reports, as well as public education information on stormdrain stenciling and the local watershed through a link to the Charles River Watershed Association.	supply educational materials and links on stormwater.
1d	Add link to town website	Engineering/Environmental	Reach thousands of residents	The Town created a stormwater page on the official Town Website and posted regulations and educational brochures and notices. The Town has maintained links to several environmental agencies and watershed groups on the Town's official website	Continue to maintain links as necessary, and add additional content to the webpage.
1e	Publish list of department names	Town Administrator	Communicate with residents	The Town has maintained an updated list of Department head names, contact numbers, and email addresses.	Continue to maintain and update lists as necessary, and add contact information for specific stormwater questions or issues.

2. Public Involvement and Participation

BMP	BMP Description	Responsible Dept./Person	Measurable	Progress on Goal(s) –	Planned Activities
ID #		Name	Goal(s)	Permit Year 14	
				(Reliance on non-municipal	
				partners indicated, if any)	
2a	Develop stenciling	Environmental/DPW	Educate hundreds of	The Environmental Coordinator	Continue to work with Eagle
	program		residents	has worked with the Dedham	Scout candidates and other

Revised				Westwood Water District in the past to develop a stormdrain stenciling program for youth. Since 2009 the Environmental Coordinator has worked with Eagle Scout candidates to stencil over 300 stormdrains throughout Dedham. The Conservation Commission has been requiring applicants for NOIs and SW Permits to have foundry stamped Do Not Dump Catchbasins.	groups to educate youth about stormwater pollution and prevention. In addition to stenciling projects the DPW continues to install permanent placards on major drainage projects. As part of the Dedham Square project, the re- constructed areas will have new placards affixed to the curbs above catch basins.
2b	Work with watershed groups	Engineering/Environmental	Coordinate efforts with others	The Engineering Director, DPW Director, Conservation Agent and	Continue to work with watershed groups on education

Revised				Environmental Coordinator have been working with the Neponset River Watershed Association (NepRWA) and MAPC to create a stormwater collaborative with 12 communities to combat stormwater runoff from parking lots and roadways. The Town of Dedham took the lead on behalf of the communities of the Neponset Stormwater Partnership to request MAPC's assistance in implementing our 2015 work plan under the Planning for MetroFuture Local Technical Assistance Program. These communities include: Canton, Dedham, Foxborough, Medfield, Milton, Sharon, Stoughton, Walpole and Westwood. For the 9 th consecutive year the Environmental Department coordinated with the CRWA to organize a Town-wide Earth Day Cleanup in Dedham.	and outreach activities and participate in educational sessions offered by these groups for continued learning on stormwater issues. Construction of the BMP retrofits (partially funded through the 319 grant awarded to the Town) began October 2015 and are anticipated on being completed by October 2016.
2c	Post signs in critical resource areas	Environmental	Notify residents of critical areas	Posted signs along Charles River and Mother Brook of potential	The Health Department continues to coordinate with

Revised				hazards from eating certain fish that were indicated as having high levels of contaminates. We have also installed "Do Not Dump" signs along various parts of the rivers.	neighboring communities and posts signs warning the public of hazards when they arise. The Environmental Department is in coordination with CRWA on water quality levels in Dedham, specifically at launch locations. CRWA has several Dedham residents that volunteer to test at sites in Town. If a poor or hazardous report came back the Town would post signs at launch locations, as well as on the Towns website and Dedham Trails website.
2d New	Water Quality Testing	Environmental	Record and report on water quality in the Charles River	The Charles River Watershed Association (CRWA) through volunteers in Dedham monitors water quality at several locations in Town.	Post information received from CRWA regarding water quality levels on the Town's Dedham Trails website, which is linked through the Town's main website. This site is specifically focused on the Water Trail and recreation on the Charles. Water Quality information would be a great addition to this site.
2e	Household Hazardous Waste Day	Health/DPW	Annual event to remove and properly dispose of residential household hazardous waste	Each year the Board of Health runs a Household Hazardous Waste Day at the DPW facility.	Continue to run an annual HHW day.
2f	Educate students about environment	DPW/Environmental	Involve students and families	Engineering, DPW, Conservation, and Environmental Departments continue to participate in the annual student government day and stress issues related to stormwater and pollution to student leaders.	Continue to participate in student government day and encourage students and youth groups to learn about pollution prevention through stormdrain stenciling projects, as well as invite guest lecturers to schools for presentations.
2g	Establish a suggestion box	DPW/Town Administration	Receive feedback	NA	This BMP was discontinued and substituted with BMP 2f

Deleted					
2h	Utilize DPW On- Line Service Request Form to solicit requests for trash/debris removal, street sweeping, etc.	DPW	Reduce the amount trash/debris and pollutants reaching receiving waters	Received and responded to hundreds of requests from residents for trash/debris removal and street sweeping using on-line request form.	Continue to solicit and respond to requests by residents so that trash/debris can be picked-up before it makes its way into receiving waters.

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities
3a	Develop a mapping system	Engineering	Map the drainage system	In 2007, the Town of Dedham established the GIS Division within the Department of Infrastructure	The Engineering Department will continue to update and improve the existing drain and sewer mapping by

3b	Locate all visible outfalls	Engineering	Inventory outfalls	Engineering. Prior to that, the Town's GIS had been managed primarily by outside consultants. The goal of the Town of Dedham has been to improve its GIS capabilities and to expand its services to other departments and the community. Since that time the GIS Division has focused its efforts on establishing an enterprise GIS within the Town. A large part of this effort has been to improve public access to information by improving and expanding the Town's online GIS services. In 2011, the GIS Department won the Special Achievement in GIS Award. Additional inspection and GPS location were performed in conjunction with dry weather testing (BMP 3f)	verifying assumed structures improving connectivity issues. The Engineering Department will continue to update new outfalls installed and investigate assumed outfalls to determine exact locations and conditions using GPS.
3c	Adopt new stormwater bylaws	Conservation Commission	Enforcement of illegal environmental actions	Town Meeting voted to appropriate funding to hire a consultant to assist with an update to the local Stormwater By-Laws and Stormwater regulations.	New Bylaw was written, accepted by Town Meeting, and has gone into effect. New stormwater regulations and permit procedures to be adopted by end of FY17.
3d	Develop a response plan	Town Administrator	Develop an emergency response plan to contain spills	The Town is in the process of updating the emergency response plan for Dedham and has created an Emergency Response team that meets quarterly.	Incorporate additional provisions into the revised emergency response plan to mitigate potential environmental emergencies such as spills, etc.
3e	Adopt a hazardous waste day	Health Dept.	Reduce illegal dumping of hazardous material	The Health Department has hosted a hazardous waste collection day	The Town will continue to conduct a yearly hazardous collection day.

3f	Perform dry weather testing of outfalls	Engineering	Identify illicit discharges	One illicit discharge was identified this year during TV inspection work of our stormwater system. We identified one sewer lateral coming from a single family residence as being connected to the Town's stormwater system. The sewer lateral was removed from the stormwater system and redirected into the Town's sewer system by the Department of Public Works.	Will continue to perform dry weather testing to identify illicit discharges
	Formerly BMP 6f				

4. Construction Site Stormwater Runoff Control

BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities
Review existing state and local regulations	Engineering	Update the Town regulations	Completed previously.	
Develop town design and construction site review policy	Conservation Commission	Develop Town standards	The Conservation Commission has continued to enforce the stormwater regulations including the application of drainage design standards.	Continue the review of projects under the stormwater regulations.
Create town specifications	Engineering	Develop standard details and specifications	Town standard details, which include standard structural BMP's have been created and posted on the Town's website.	Continue to update or add standards as necessary.
Develop town inspection guidelines	Conservation Commission	Ensure that work that has been permitted is satisfactorily constructed	The Conservation Commission enforces the stormwater regulations.	Conservation Agent's hours may be increasing to allow additional time for inspections.
Determine inspection responsibilities	DPW/Town Administration	Establish means of inspection	No action	This BMP has been deleted as it is redundant with respects to BMP 4d.
	Review existing state and local regulations Develop town design and construction site review policy Create town specifications Develop town inspection guidelines Determine inspection	Dept./Person NameReview existing state and local regulationsEngineeringDevelop town design and construction site review policyConservation CommissionCreate town specificationsEngineeringDevelop town inspection guidelinesConservation CommissionDevelop town inspection guidelinesConservation CommissionDetermine inspectionDPW/Town	Dept./Person NameReview existing state and local regulationsEngineeringUpdate the Town regulationsDevelop town design and construction site review policyConservation CommissionDevelop Town standardsCreate town specificationsEngineering EngineeringDevelop standard details and specificationsDevelop town inspection guidelinesConservation CommissionDevelop standard details and specificationsDevelop town inspection guidelinesConservation CommissionEnsure that work that has been permitted is satisfactorily constructedDetermine inspectionDPW/TownEstablish means of	Dept./Person NameDept./Person NamePermit Year 14 (Reliance on non-municipal partners indicated, if any)Review existing state and local regulationsEngineeringUpdate the Town regulationsCompleted previously.Develop town design and construction site review policyConservation CommissionDevelop Town standardsThe Conservation Commission has continued to enforce the stormwater regulations including the application of drainage design standards.Create town specificationsEngineering EngineeringDevelop standard details and specificationsTown standard details, which include standard details and specificationsDevelop town inspection guidelinesConservation CommissionEnsure that work that has been permitted is satisfactorily constructedThe Conservation Commission enforces the stormwater regulations.Determine inspectionDPW/TownEstablish means of No actionNo action

4f.	Coordinate with neighboring communities regarding stormwater management	Environmental, Engineering, Conservation, DPW, Town Administration	Coordinate with the City of Boston regarding discharges through interconnections or run-off from construction projects	The Town of Dedham signed in 2012 an inter-municipal agreement with the City of Boston regarding the management of stormwater. The Engineering Director, DPW Director, Conservation Agent and Environmental Coordinator have been working with the Neponset River Watershed Association (NepRWA) and MAPC to create a stormwater collaborative with 12 communities to combat stormwater runoff from parking lots and roadways. The Town of Dedham took the lead on behalf of the communities of the Neponset Stormwater Partnership to request MAPC's assistance in implementing our 2015 work plan under the Planning for MetroFuture Local Technical Assistance Program. These communities include: Canton, Dedham, Foxborough, Medfield, Milton, Sharon, Stoughton, Walpole and Westwood.	Continue to coordinate with the City of Boston on stormwater, illicit connection and other issues related to the management of stormwater. Continue to participate in the Neponset Valley Stormwater Collaborative.

5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP	BMP Description	Responsible	Measurable Goal(s)	Progress on Goal(s) -	Planned Activities
ID #		Dept./Person		Permit Year 14	
		Name		(Reliance on non-municipal partners	

				indicated, if any)	
5a	Develop stormwater policy	Conservation Commission	Encourage recharge	The Town has created stormwater regulations that strongly encourage	Continue to enforce existing regulations.
				recharge. The Commission continues	regulations.
				to revise and update these regulations.	
5b	Develop standards for	Conservation	Regulate subdivision	The Town currently reviews	Continue to enforce existing
	BMP's	Commission	and site plans	subdivision and site plans for	regulations, and update or add
				compliance with the stormwater	details to Town Standard Details as
				regulations, and utilizes the Town	necessary.
				Standard Details.	
5c	Develop bylaws and	Conservation	Regulate new	The Conservation Commission	New bylaw in effect, rules and regs
	policy	Commission	development runoff	enforces the stormwater regulations	and permit process to follow.
				and regularly reviews the bylaws and	
				policies.	

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept Name	t./Person	Measurable Goal(s)	e	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)		Planned Activities
ба	Implement pollution prevention program	DPW		Identify ways to increase compliance		Continue with street sweeping and monitoring catch basins for cleaning.		Continue street sweeping and catch basin cleaning program
6b	Develop TV inspection	DPW/Engineering Department		Eliminate illegal connections		The Town performed TV inspection on several hundred linear feet of storm drains in addition to the annual inspection of sewer lines.		<i>This BMP was discontinued;</i> <i>see new BMP 3f</i>
6с	Develop hazardous waste training	DPW		Train 20 employees Maintain certificates of curre employees		Maintain certificates of current employees	-	Maintain certificates of current employees
6d	Sweep all paved roads	DPW				The DPW continued annual street sweeping program. Arterial roads are swept every 3 days and all other roads twice per year.		Continue the annual street sweeping program.
6e	Clean all catchbasins	DPW		Clean catch every three		The DPW estimates that it has cleaned approximately one thin of the catch basins and over the past year. Exact numbers are r available.	rd e	Continue our Catch Basin Cleaning Program
6f Revised	Develop a litter management program	Conservation/Env	ironmental	Eliminate dumping and pollution to catchbasins and water bodies		The Environmental Dept, DPW Engineering Dept and Conservation Agent will contin to work with NepRWA to disseminate information about	nue	Continue to work with NepRWA and other community groups
						dog waste and proper disposal.		
6g	Perform visual dry weather outfall inspections	Engineering	Identify ill discharges drains and	to storm	No actic	m planned in year 3.	inspo prior impa num susp conr	orm visual dry weather ections of outfalls giving rity to outfalls discharging to aired waters. Determine the ber of outfalls which are ected of having illicit rections and the scope of work ired to further identify the

	source(s).
--	------------

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) <<i f applicable>>

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 14 (Reliance on non-municipal partners indicated, if any)	Planned Activities
7a	Develop a landscaping policy	DPW/Parks Department	Eliminate excessive chemicals	No action.	
7b Deleted	Develop a spill prevention plan	DPW/Town Administration	Reduce spill prevention to rivers	No action.	This BMP was deleted as it was redundant with respects to BMP 3d.
7c Deleted	Develop a training program	DPW/Town Administration	Educate 8 employees	No action.	<i>This BMP was deleted as it was redundant with respects to BMP 6c.</i>
7d	Install new drainage structures	DPW	Eliminate some TSS	The DPW replaced/installed over 30 substandard catch basins with new deep sump catch basins.	Install deep sump catch basins as needed and incorporate new basins into existing roadway reconstruction when possible.
7e	Develop a housekeeping plan	DPW	Construct new salt shed to replace current uncovered salt storage	Construction of the Salt Shed was completed in November 2006.	

7a. Additions

7b. WLA Assessment

The Town of Dedham has not yet implemented controls at this point in the permit process that would significantly impact the waste load allocation.

Part IV. Summary of Information Collected and Analyzed

Part V. Program Outputs & Accomplishments (OPTIONAL)

(Since beginning of permit coverage unless specified otherwise by a **, which indicates response is for period covering April 1, 2014 through March 31, 2015)

Programmatic

	(Preferred Unit	ts) Response
Stormwater management position created/staffed	(y/n)	Y
Annual program budget/expenditures **	(\$)	\$102,144.00
Total program expenditures since beginning of permit coverage	(\$)	\$102,144.00
Funding mechanism(s) (General Fund, Enterprise, Utility, etc)		General Fund

Education, Involvement, and Training

Estimated number of property owners reached by education program(s)	(# or %)	Unknown
Stormwater management committee established	(y/n)	Ν
Stream teams established or supported	(# or y/n)	Ν
Shoreline clean-up participation or quantity of shoreline miles cleaned **	(y/n or mi.)	Y
Shoreline cleaned since beginning of permit coverage	(mi.)	Unknown
Household Hazardous Waste Collection Days		
days sponsored **	(#)	1
 community participation ** 	(# or %)	220
material collected **	(tons or gal)	n/a
School curricula implemented	(y/n)	у

Legal/Regulatory

	In Place Prior to	Reviewing Existing		Draft in	
	Phase II	Authorities	Drafted	Review	Adopted
Regulatory Mechanism Status (indicate with "X")					
Illicit Discharge Detection & Elimination					Х
					16

Erosion & Sediment Control			Х
 Post-Development Stormwater Management 			Х
Accompanying Regulation Status (indicate with "X")			
 Illicit Discharge Detection & Elimination 			Х
 Erosion & Sediment Control 			Х
 Post-Development Stormwater Management 			Х

Mapping and Illicit Discharges

	(Preferred Units	s) Response
Outfall mapping complete	(%)	99%
Estimated or actual number of outfalls	(#)	200
System-Wide mapping complete (complete storm sewer infrastructure)	(%)	99%
Mapping method(s)		
 Paper/Mylar 	(%)	
 CADD 	(%)	
 GIS 	(%)	100%
Outfalls inspected/screened **	(# or %)	0
Outfalls inspected/screened (Since beginning of permit coverage)	(# or %)	443
Illicit discharges identified **	(#)	1
Illicit discharges identified (Since beginning of permit coverage)	(#)	6
Illicit connections removed **	(#); and	1
	(est. gpd)	
Illicit connections removed (Since beginning of permit coverage)	(#); and	6
	(est. gpd)	
% of population on sewer	(%)	93%
% of population on septic systems	(%)	7%

Construction

	(Preferred Unit	s) Response
Number of construction starts (>1-acre) **	(#)	2
Estimated percentage of construction starts adequately regulated for erosion and sediment control **	(%)	100%
Site inspections completed **	(# or %)	100%
Tickets/Stop work orders issued **	(# or %)	2

Fines collected **	(# and \$)	0
Complaints/concerns received from public **	(#)	0

Post-Development Stormwater Management

Estimated percentage of development/redevelopment projects adequately regulated for post-	(%)	100%
construction stormwater control		
Site inspections (for proper BMP installation & operation) completed **	(# or %)	100%
BMP maintenance required through covenants, escrow, deed restrictions, etc.	(y/n)	Y
Low-impact development (LID) practices permitted and encouraged	(y/n)	Y

Operations and Maintenance

Average frequency of catch basin cleaning (non-commercial/non-arterial streets) **	(times/yr)	1-2 per year
Average frequency of catch basin cleaning (commercial/arterial or other critical streets) **	(times/yr)	3 per year
Qty of structures cleaned **	(#)	1200 +/-
Qty. of storm drain cleaned **	(%, LF or	3600 lf +/-
	mi.)	
Qty. of screenings/debris removed from storm sewer infrastructure **	(lbs. or	Unknown
	tons)	
Disposal or use of screenings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Beneficial-LF

Basin Cleaning Costs		
 Annual budget/expenditure (labor & equipment)** 	(\$)	\$100,000 +/-
Hourly or per basin contract rate **	(\$/hr or \$ per basin)	Unknown
 Disposal cost** 	(\$)	
Cleaning Equipment		
• Clam shell truck(s) owned/leased	(#)	Owned
• Vacuum truck(s) owned/leased	(#)	Leased
Vacuum trucks specified in contracts	(y/n)	Yes
% Structures cleaned with clam shells **	(%)	85 %
% Structures cleaned with vactor **	(%)	15%

	(Preferred Un	its) Response
Average frequency of street sweeping (non-commercial/non-arterial streets) **	(times/yr)	5
Average frequency of street sweeping (commercial/arterial or other critical streets) **	(times/yr)	Every 3 Days
Qty. of sand/debris collected by sweeping **	(lbs. or	Unknown
	tons)	
Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.) **	(location)	Beneficial-LF
Annual Sweeping Costs		
 Annual budget/expenditure (labor & equipment)** 	(\$)	\$400,000 +
• Hourly or lane mile contract rate **	(\$/hr. or	
	ln mi.)	
 Disposal cost** 	(\$)	
Sweeping Equipment		
Rotary brush street sweepers owned/leased	(#)	Yes
Vacuum street sweepers owned/leased	(#)	
Vacuum street sweepers specified in contracts	(y/n)	
 % Roads swept with rotary brush sweepers ** 	%	100%
% Roads swept with vacuum sweepers **	%	

Reduction (since beginning of permit coverage) in application on public land of: (" N/A " = never used; "100%" = elimination)	
 Fertilizers 	(lbs. or %)
 Herbicides 	(lbs. or %)
 Pesticides 	(lbs. or %)
Integrated Pest Management (IPM) Practices Implemented	(y/n)

	(Preferred Unit	s) Response
Average Ratio of Anti-/De-Icing products used **	% NaCl % CaCl ₂	NaCl MgCl2
(also identify chemicals and ratios used in specific areas, e.g., water supply protection areas)	% MgCl ₂ % CMA % Kac % KCl % Sand	
Pre-wetting techniques utilized **	(y/n or %)	Yes
Manual control spreaders used **	(y/n or %)	Yes
Zero-velocity spreaders used **	(y/n or %)	n/a
Estimated net reduction or increase in typical year salt/chemical application rate	(±lbs/ln mi. or %)	250lbs ln mi
Estimated net reduction or increase in typical year sand application rate **	(±lbs/ln mi. or %)	
% of salt/chemical pile(s) covered in storage shed(s)	(%)	100%
Storage shed(s) in design or under construction	(y/n or #)	No
100% of salt/chemical pile(s) covered in storage shed(s) by May 2008	(y/n)	Yes

Water Supply Protection

Storm water outfalls to public water supplies eliminated or relocated	# or y/n	Ν
Installed or planned treatment BMPs for public drinking water supplies and their protection areas	# or y/n	Ν
Treatment units induce infiltration within 500-feet of a wellhead protection area	# or y/n	Ν