# Year 1 Annual Report

## Massachusetts Small MS4 General Permit Reporting Period: May 1, 2018-June 30, 2019

\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form\*\*

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed.

## **Part I: Contact Information**

Name of Municipality or Organization: Town	of Falmouth
EPA NPDES Permit Number: MAR041114	
Primary MS4 Program Manager Contact In	ıformation
Name: James McLoughlin, P.E.	Title: Town Engineer
Street Address Line 1: Falmouth Public Works	s, Engineering Division
Street Address Line 2: 416 Gifford Street	
City: Falmouth State	e: MA Zip Code: 02540
Email: james.mcloughlin@falmouthma.gov	Phone Number: (508) 457-2543
Fax Number: na	
Stormwater Management Program (SWMP	') Information
SWMP Location (web address): http://www.fa	almouthmass.us/162/Stormwater-Program
Date SWMP was Last Updated: June 30, 2019	)
If the SWMP is not available on the web pleas not posted on the web:	se provide the physical address and an explanation of why it is

## Part II: Self Assessment

*First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4.* 

	-			· ·			
Impairment(	<u>(s)</u>						
	☐ Bacteria/Pathogens ☐ Solids/ Oil/ Grease (Hy	☐ Chloride ydrocarbons)/ Meta	☐ Nitrogen				
TMDL(s)							
In State:	☐ Assabet River Phospho☐ Charles River Watersh		eria and Pathogen   Lake and Pond				
Out of State:	☐ Bacteria/Pathogens	☐ Metals	☐ Nitrogen	☐ Phosphorus			
			Cl	ear Impairments and TMDLs			
<b>you have con</b> unchecked. A	<b>npleted that permit requirer</b> dditional information will b	<b>nent fully.</b> If you ho	ave not completed a re	ch box you are certifying that equirement leave the box			
Year 1 Requi		1 . 1					
	op and begin public education  fy and develop inventory of years	1	9	scharged to the MS4 in the			
·	○ The SSO inventory is	attached to the ema	il submission				
	• The SSO inventory can	n be found at the fo	llowing website:				
	http://www.falmouthn	nass.us/162/Stormw	rater-Program; IDDE	Plan, Appendix B			
⊠ Develo	op written IDDE plan includ	ding a procedure for	screening and sampli	ing outfalls			
☐ IDDE	ordinance complete						
⊠ Identif	Ty each outfall and interconny rank each catchment for in	nection discharging nvestigation	from MS4, classify in	nto the relevant category, and			
	<ul> <li>The priority ranking o</li> </ul>						
	• The priority ranking of	f outfalls/interconne	ections can be found a	t the following website:			
	http://www.falmouthn	nass.us/162/Stormw	rater-Program; IDDE	Plan, Appendix C			
☐ Constr	ruction/ Erosion and Sedime	ent Control (ESC) o	rdinance complete				
□ Develo	op written procedures for sin	te inspections and e	nforcement of sedime	nt and erosion control			
	☐ Develop written procedures for site plan review						
-	a log of catch basins cleaned	-					
☐ Complete inspection of all stormwater treatment structures							

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<ul> <li>         ⊠ Annual opportunity for public participation in review and implementation of SWMP     </li> <li>         ∑ Comply with State Public Notice requirements     </li> </ul>
⊠ Keep records relating to the permit available for 5 years and make available to the public
Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
☐ Annual training to employees involved in IDDE program
<b>Bacteria</b> / <b>Pathogens</b> (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable) <u>Annual Requirements</u>
Public Education and Outreach*
Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
Permittee or its agents disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria
* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)
Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)
Annual Requirements
Public Education and Outreach*
Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers
Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter
* Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)
Good Housekeeping and Pollution Prevention for Permittee Owned Operations  Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)
Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)
Annual Requirements
Public Education and Outreach*
Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers
Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

Fown of Falmouth Page 4
Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter
* Public education messages can be combined with other public education requirements as applicable (se Appendix H and $F$ for more information)
Good Housekeeping and Pollution Prevention for Permittee Owned Operations
Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)
Potential structural BMPs
Any structural BMPs listed in Attachment 3 to Appendix F already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H. Document the BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in
mass per year by the BMP in each each annual report

Use the box below to input additional details on any unchecked boxes above or any additional information you would like to share as part of your self assessment:

Public Education and Outreach - The Town has not yet developed a comprehensive stormwater education program, however, this will be done during Year 2. It is anticipated that this program will include a website with audience-specific information provided for download, as well as brochures and fact sheets for distribution in hardcopy. The Town has not yet developed seasonal educational messages for all seasons as required for phosphorus, nitrogen, and bacteria TMDL and water quality limited waterbody requirements, however, will do so during Year 2.

IDDE Ordinance and Construction/ Erosion and Sediment Control Ordinance - The Town is currently reviewing a draft IDDE ordinance and Construction/ Erosion and Sediment Control Ordinance. The Town will also be adopting an updated Post-Construction Stormwater Management Ordinance during Year 2. It is anticipated that all ordinances will be put up for vote at the spring 2020 town meeting.

Procedures for Site Plan Review and Site Inspections - The Town has some existing requirements under its zoning regulations, however these do not provide a comprehensive program that applies to all sites that disturb one acre or more. These will be revised along with the ordinance updates to be completed during Year 2 as part of a comprehensive stormwater management regulatory mechanism and accompanying regulations.

Stormwater BMP Inspections - The Town completed a comprehensive assessment of its structural stormwater BMPs in July 2019. A total of 16 BMPs were inspected, the majority of which required little or no maintenance. Several BMPs had minor sediment accumulation and will be monitored during the coming year. Should sediment accumulation increase to the point that maintenance is required, BMPs will be maintained to ensure proper function. BMPs will be inspected again during summer 2020.

IDDE Training - An employee IDDE Training program will be developed during Year 2, with annual training to be performed starting in Year 2.

Nitrogen/Phosphorus Structural BMP Tracking - The Town will begin evaluation of its permittee-owned stormwater BMPs during future years in conjunction with preparing the nutrient source identification reports. It is expected this task will not start until at least Year 3.

# Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any cha submitted?	inges to your lists of receiving waters, outfalls, or impairments since the NOI was
Yes 🗌	No ⊠
If yes, describe below,	including any relevant impairments or TMDLs:
	NOI, Falmouth will meet the requirements of part IV of Appendix F (Cape Cod ddlers Cove, Rands Harbor, and Wild Harbor, even though the TMDLs were finalized MS4 Permit issue date.

## **Part IV: Minimum Control Measures**

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

## **MCM1: Public Education**

Number of educational messages completed during the reporting period: 3
Below, report on the educational messages completed during the first year. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.
BMP: Stormwater pollution is trash, oil/cigarette butts, & dog waste
Message Description and Distribution Method:
Think Blue Massachusetts "Fowl Water" video (https://www.thinkbluemassachusetts.org/) Advertisement on Facebook, Instagram, & YouTube
Targeted Audience: Residents
Responsible Department/Parties: Information Technology
Measurable Goal(s):
29,076 social media impressions from Town residents.
Message Date(s): June 23, 2019 - June 30, 2019
Message Completed for: Appendix F Requirements ⊠ Appendix H Requirements ⊠
Was this message different than what was proposed in your NOI? Yes ☐ No ☒
If yes, describe why the change was made:
BMP: Stormwater Webpage  Message Description and Distribution Method:
Develop and maintain a town stormwater website with information related to stormwater, as well as post an informational video on pet waste pickup called "Scoop the Poop".
Targeted Audience: Residents, Businesses, institutions and commercial, Developers, Industrial
Responsible Department/Parties: Engineering, I.T. Department
Measurable Goal(s):
Update existing website with new information. Continue periodic updates throughout permit term.

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Message Date(s): Ongoing	
Message Completed for: Appendix F Requirements ⊠ Appendix H Requirements ⊠	
Was this message different than what was proposed in your NOI? Yes ☐ No ☒	
If yes, describe why the change was made:	
BMP:[Message name here]	
Message Description and Distribution Method:	
Targeted Audience:	
Responsible Department/Parties:	
Measurable Goal(s):	
Message Date(s):	
Wiessage Date(s).	
Message Completed for: Appendix F Requirements   Appendix H Requirements	
Was this message different than what was proposed in your NOI? Yes $\square$ No $\square$	
If yes, describe why the change was made:	
A 11 1 M	
Add an Educational Message	
MCM2: Public Participation	
Describe the opportunity provided for public involvement in the development of the Stormwater Me Program (SWMP) during the reporting period:	anagement
SWMP Plan for Download - The Town has posted the SWMP Plan on Town website along with co information to allow for public comment.	ntact

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Was this opportunity different than what was proposed in your NOI? Yes $\square$ No $\boxtimes$
Describe any other public involvement or participation opportunities conducted during the reporting period:
MCM3: Illicit Discharge Detection and Elimination (IDDE)
Sanitary Sewer Overflows (SSOs)  Below, report on the number of SSOs identified in the MS4 system and removed during this reporting period.
Number of SSOs identified: 0
Number of SSOs removed: 0
Below, report on the total number of SSOs identified in the MS4 system and removed to date. At a minimum, report SSOs identified since 2013.
Total number of SSOs identified: 0
Total number of SSOs removed: 0
MS4 System Mapping
Describe the status of your MS4 map, including any progress made during the reporting period:
The Town has mapped the majority of its known stormwater infrastructure, including catch basins, manholes,
and outfalls, as well as its receiving waterbodies. As new infrastructure is located, it is added to the Town's GIS library. It should be noted that the Town's drainage infrastructure has a substantial number of leaching
structures and thus is generally composed of disconnected, small segments.
Screening of Outfalls/Interconnections
If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of
sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses.
<ul> <li>The outfall screening data is attached to the email submission</li> </ul>
• The outfall screening data can be found at the following website:
N/A, none completed to date
Below, report on the number of outfalls/interconnections screened during this reporting period.
Number of outfalls screened: 0

Town of Falmouth Page 9 Below, report on the percent of total outfalls/interconnections screened to date. Percent of total outfalls screened: 0% **Catchment Investigations** *If conducted, please submit all data collected during this reporting period as part of the dry and wet weather* investigations. Also include the presence or absence of System Vulnerability Factors for each catchment. • The catchment investigation data is attached to the email submission O The catchment investigation data can be found at the following website: N/A, none completed to date Below, report on the number of catchment investigations completed during this reporting period. Number of catchment investigations completed this reporting period: 0 Below, report on the percent of catchments investigated to date. Percent of total catchments investigated: 0% Optional: Provide any additional information for clarity regarding the catchment investigations below: N/A, not yet started **IDDE Progress** If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal. O The illicit discharge removal report is attached to the email submission • The illicit discharge removal report can be found at the following website: N/A, none found to date Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed during this reporting period. Number of illicit discharges identified: 0 Number of illicit discharges removed: 0 Estimated volume of sewage removed: N/A [UNITS] Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed since the effective date of the permit. Total number of illicit discharges identified: 0

Total number of illicit discharges removed: 0

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or

planned to be removed below:

N/A, none found to date

## **Employee Training**

Describe the frequency and type of employee training conducted during the reporting period:

An employee IDDE Training program will be developed during Year 2, with annual training to be performed starting in Year 2.

### MCM4: Construction Site Stormwater Runoff Control

Below, report on the construction site plan reviews, inspections, and enforcement actions completed during this reporting period.

Number of site plan reviews completed: 12
Number of inspections completed: 33
Number of enforcement actions taken: 0

# MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

## **Ordinance Development**

Describe the status of the post-construction ordinance required to be complete in year 2 of the permit term:

The current Town bylaws and regulations are partially in compliance with the Year 2 requirements, however do not meet all requirements pertaining to new development and redevelopment. The Town will draft a revised bylaw and accompanying regulations to meet all Year 2 requirements, and it is anticipated that revisions will be put up for vote at the spring 2020 town meeting.

## As-built Drawings

Describe the status of the measures the MS4 has utilized to require the submission of as-built drawings and ensure long term operation and maintenance of completed construction sites required to be complete in year 2 of the permit term:

As part of the regulatory updates to be performed during Year 2, procedures for submittal of as-built drawings and long term operation and maintenance will be developed.

## **Street Design and Parking Lots Report**

Describe the status of the street design and parking lots assessment due in year 4 of the permit term, including any planned or completed changes to local regulations and guidelines:

N/A, to be completed during future permit year	ars.	

## **Green Infrastructure Report**

Describe the status of the green infrastructure report due in year 4 of the permit term, including the findings and progress towards making the practice allowable:

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1 N/ Z 1.	w	$\mathcal{L}$	COIIII	neteu	uuiiii	Iuluic	DCITIL	v cai s.

## **Retrofit Properties Inventory**

Describe the status of the inventory, due in year 4 of the permit term, of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

The Town is currently developing an inventory of its permittee-owned properties. Once completed, facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

## MCM6: Good Housekeeping

## **Catch Basin Cleaning**

Describe the status of the catch basin cleaning optimization plan:

The Town developed a Catch Basin Cleaning Optimization Plan during Year 1 as a component of its SWMP P

If complete, attach the catch basin cleaning optimization plan or the schedule to gather information to develop the optimization plan:

- O The catch basin cleaning optimization plan or schedule is attached to the email submission
- The catch basin cleaning optimization plan or schedule can be found at the following website:

http://www.falmouthmass.us/162/Stormwater-Program; SWMP Plan, Appendix G

Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins during this reporting period.

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	Number of catch basins inspected	d: 600		
	Number of catch basins cleaned:	450		
	Total volume or mass of materia	l removed from a	all catch basins: 2,250	су
Below, report o	on the total number of catch basin	as in the MS4 sys	tem, if known.	
	Total number of catch basins: 6,3	300		
If applicable:				
Report on the a inspections/cle	actions taken if a catch basin sum caning events:	p is more than 5	0% full during two consecu	tive routine
Not yet applica	able, pending collection of a secon	nd round of cate	h basin inspections.	
Street Sweepin	ng			
Describe the st	tatus of the written procedures for	sweeping street	s and municipal-owned lots	<b>::</b>
This consists of	eloped a Street Sweeping Optimi of a map displaying sweeping requ P) for completing the sweeping.			
	et sweeping completed during the	reporting period	l using one of the three met	rics below.
	• Number of miles cleaned: 400	)		
	O Volume of material removed:	300	су	
	O Weight of material removed:			
If applicable:				
* **	rbed roadways with no catch basi	ns, describe the 1	progress of the inspection, or	documentation, and

targeted sweeping plan:

DPW personnel observe all regulated town-owned roadways for maintenance needs, including street sweeping, during routine operations. Personnel also observe known trouble areas, such as projects with largescale construction projects or projects with substantial land disturbance, for evidence of runoff-laden sediment onto roadways that may require more frequent sweeping in addition to that outlined under the Street Sweeping Optimization Plan. In addition, town residents periodically call the DPW to report localized areas needing sweeping that DPW personnel then visit to inspect. Should areas in need of additional sweeping be observed, the Town documents these areas as part of its Street Sweeping Optimization Plan and schedules areas for sweeping during the next upcoming round. Note that the Town applies no sand to roadways during winter operations, and thus observed sweeping needs are typically minimal. Inspections of rural uncurbed roadways conducted to date have not yet observed any needs for additional sweeping within regulated urbanized area roadways.

#### **Winter Road Maintenance**

Describe the status of the written procedures for winter road maintenance including the storage of salt and sand:

The Town developed SOPs for winter road maintenance during Year 1. These SOPs will be included as part of a larger comprehensive Operation and Maintenance (O&M) Plan during Year 2 that covers other facilities and stormwater infrastructure.

## **Inventory of Permittee-Owned Properties**

Describe the status of the inventory, due in year 2 of the permit term, of permittee-owned properties, including parks and open spaces, buildings and facilities, and vehicles and equipment, and include any updates:

The Town is currently developing an inventory of its permittee-owned properties, to be completed by the end of Year 2.

## O&M Procedures for Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Describe the status of the operation and maintenance procedures, due in year 2 of the permit term, of permittee-owned properties (parks and open spaces, buildings and facilities, vehicles and equipment) and include maintenance activities associated with each:

The Town is currently developing O&M Procedures for its Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment, to be completed by the end of Year 2.

## **Stormwater Pollution Prevention Plan (SWPPP)**

Describe the status of any SWPPP, due in year 2 of the permit term, for permittee-owned or operated facilities including maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater:

The Town will complete a comprehensive facility assessment during early Year 2 to determine which facilities require preparation of SWPPPs. Once complete, the Town will work towards completing SWPPPs for applicable facilities by the end of Year 2.

Below	, report on the	number of sit	e inspections fo	or facilities that	t require a SWF	PPP completea	l during this
report	ing period.						

Number of site inspections completed	1: 0
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Describe any corrective actions taken at a facility with a SWPPP:

	•
/.	
N/A	
1 1/ 1 1	

#### **O&M Procedures for Stormwater Treatment Structures**

Describe the status of the written procedure for stormwater treatment structure maintenance:

The Town developed comprehensive written procedures and checklists for structural BMP inspections during Year 1. The Town completed a comprehensive assessment of its structural stormwater BMPs in July 2019. A total of 16 BMPs were inspected, the majority of which required little or no maintenance. Several BMPs had minor sediment accumulation and will be monitored during the coming year. Should sediment accumulation increase to the point that maintenance is required, BMPs will be maintained to ensure proper function. BMPs will be inspected again during summer 2020.

#### **Additional Information**

#### **Monitoring or Study Results**

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

	Not applicable
	The results from additional reports or studies are attached to the email submission
	O The results from additional reports or studies can be found at the following website(s):
	onitoring or studies were conducted on your behalf or if monitoring or studies conducted by other ere reported to you, a brief description of the type of information gathered or received shall be below:
N/A, not y	ret started.

#### **Additional Information**

*Optional:* Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above:

Activities performed during Year 1 include submittal of a Notice of Intent, development of a comprehensive Stormwater Management Program (SWMP) Plan which in part also included development of a Catch Basin Cleaning Optimization Plan and Street Sweeping Optimization Plan, development of a comprehensive Illicit Discharge Detection and Elimination (IDDE) Plan which in part included creation of procedures for identifying and removing illicit discharges along with classifying, prioritizing, and delineating catchment areas. Other activities completed included development of winter operation and maintenance procedures and completing an assessment of existing stormwater-related regulatory mechanisms.

#### **Activities Planned for Next Reporting Period**

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 2 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree 🗵

- Complete system mapping Phase I
- Begin investigations of catchments associated with Problem Outfalls
- Develop or modify an ordinance or other regulatory mechanism for post-construction stormwater runoff from new development and redevelopment
- Establish and implement written procedures to require the submission of as-built drawings no later than two years after the completion of construction projects
- Develop, if not already developed, written operations and maintenance procedures
- Develop an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; review annually and update as necessary
- Establish a written program detailing the activities and procedures the permittee will implement so that the MS4 infrastructure is maintained in a timely manner
- Develop and implement a written SWPPP for maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater
- Enclose or cover storage piles of salt or piles containing salt used for deicing or other purposes
- Develop, if not already developed, written procedures for sweeping streets and municipal-owned lots
- Develop, if not already developed, written procedures for winter road maintenance including storage of salt and sand
- Develop, if not already developed, a schedule for catch basin cleaning
- Develop, if not already developed, a written procedure for stormwater treatment structure maintenance
- Develop a written catchment investigation procedure (18 months)

## Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4 in the last 5 years
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all uncurbed streets at least annually

Provide any additional details on activities planned for permit year 2 below:		

Town of Falmouth		

## Part V: Certification of Small MS4 Annual Report 2019

#### 40 CFR 144.32(d) 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, I certify that 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.

Name:	Julian M. Suso	Title: Town Manager
Signature	In Jams	Date: 9/27/19
	[Signatory may be a duly authorized	
	representative]	
	Deter Johnson Grand	
	Ant. Town Monager	