# **Year 2 Annual Report**

## Massachusetts Small MS4 General Permit Reporting Period: July 1, 2019-June 30, 2020

\*\*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. Please ONLY report on activities between July 1, 2019 and June 30, 2020 unless otherwise requested.

## **Part I: Contact Information**

Name	of Municipality or Organi	zation: Town of Falmo	uth			
EPA N	PDES Permit Number: M	AR041114				
Prima	ry MS4 Program Manag	er Contact Informati	on			
Name: James McLoughlin, P.E.		Title:	Town Engineer			
Street	Address Line 1: Falmouth	Public Works, Engine	ering D	ivision		
Street	Address Line 2: 416 Giffo	ord Street				
City:	ty: Falmouth State: MA			de: 02540		
Email: james.mcloughlin@falmouthma.gov			Phone Number: (508) 457-2543			
Storm	water Management Prog	, ,		DogumantCantar/W	Tiew/6286/Falmouth-S	W/N/D
SWMP Location (web address):		Plan-2019?bidId=	1888.US/		iew/0280/Faimoutii-S	vv 1v1F -
Date S	WMP was Last Updated:	June 30, 2019				
If the S	SWMP is not available on	the web please provide	e the ph	ysical address:		

#### **Part II: Self-Assessment**

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <a href="https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state">https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state</a>

Impairment(s)

Bacteria/Pathogens Chloride Nitrogen X Phosphorus

Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

In State: Assabet River Phosphorus × Bacteria and Pathogen × Cape Cod Nitrogen

Charles River Watershed Phosphorus

Lake and Pond Phosphorus

Out of State: Bacteria/Pathogens Metals Nitrogen Phosphorus

Clear Impairments and TMDLs

Next, check off all requirements below that have been completed. By checking each box you are certifying that you have completed that permit requirement fully. If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

#### Year 2 Requirements

Completed Phase I of system mapping

- × Developed a written catchment investigation procedure and added the procedure to the SWMP Developed written procedures to require the submission of as-built drawings and ensure the long term operation and maintenance of completed construction sites and added these procedures to the SWMP
- × Enclosed or covered storage piles of salt or piles containing salt used for deicing or other purposes
- Eveloped written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Eveloped an inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment and added this inventory to the SWMP
- imes Completed a written program for MS4 infrastructure maintenance to reduce the discharge of pollutants

Developed written SWPPPs, included in the SWMP, for all of the following permittee owned or

× operated facilities: maintenance garages, public works yards, transfer stations, and other waste handling facilities where pollutants are exposed to stormwater

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Phase I Mapping - mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

As-Builts and Long-Term O&M - the Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule. As a result of the COVID-19 outbreak, regulations were not updated as planned during Permit Year 2.

#### **Annual Requirements**

- $\times$  Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- imes Kept records relating to the permit available for 5 years and made available to the public
- X The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - O This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - O The updated SSO inventory is attached to the email submission
  - O The updated SSO inventory can be found at the following website:
- × Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
  - Provided training to employees involved in IDDE program within the reporting period
- × All curbed roadways were swept at least once within the reporting period
- × Updated outfall and interconnection inventory and priority ranking as needed

*Optional:* If you would like to describe progress made on any incomplete requirements listed above, provide any additional information, and/or if any of the above annual requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability; however was completed on August 6, 2020 prior to submittal of this Annual Report.

Outfall Inventory and Ranking - the outfall and interconnection inventory is updated on an ongoing basis as dry weather screening is performed. The priority ranking will be updated after dry weather inspections are completed and before catchment investigations commence.

**Bacteria**/ **Pathogens** (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

<u>Annual Requirements</u>

Public Education and Outreach\*

 $\times$  Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time

- $\times$  Provided 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)

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Public Education and Outreach - the Town is part of the statewide ThinkBlue campaign which in part distributes a number of public outreach-related materials throughout the year, including septic system maintenance and pet waste. Falmouth's stormwater webpage also has links to seasonal messages on pet waste and septic system maintenance. There were no flyers delivered to dog owners at the time of dog license issuance or renewal in part due to COVID-19 closures of the Town Hall.

Nitrogen (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

#### **Annual Requirements**

Public Education and Outreach\*

- X Distributed 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
- × Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- X Distributed 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
Increased 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)

*Optional:* If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Public Education and Outreach - the Town is part of the statewide ThinkBlue campaign which in part distributes a number of public outreach-related materials throughout the year. Falmouth's stormwater webpage also has links to seasonal messages on grass clipping management, pet waste, and leaf litter disposal. There were no mailings or other direct distribution of educational materials due to cost implications and limited staff availability due to COVID-19 restrictions.

Phosphorus (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

## **Annual Requirements**

Public Education and Outreach\*

- X Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- × Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- × Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

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\* 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 Increased 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
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Any structural BMPs already existing or installed in the regulated area by the permittee or its agents
was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to
Appendix F. 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 were documented.

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the estimated phosphorus removed in mass per year by the BMP were documented.  O The BMP information is attached to the email submission
○ The BMP information can be found at the following website:
Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:
Public Education - Falmouth's stormwater webpage has links to seasonal messages on grass clipping
management, pet waste, and leaf litter disposal. There were no mailings or other direct distribution of
educational materials due to cost implications and limited staff availability due to COVID-19 restrictions.
Structural BMPs - BMPs pollutant removal has not yet been computed, however, it is expected that this will be completed during Year 3.
Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

## Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

YesNo

If yes, describe below, including any relevant impairments or TMDLs:

The Town has determined it is subject to the following additional TMDL and Impaired Waters requirements:

- -Great Pond (MA96-54), bacteria TMDL requirements. (Appendix F, Part A.II)
- -Fiddlers Cove (MA95-79), bacteria impaired waters requirements. (Appendix H, Part III)
- -Fiddlers Cove (MA95-79), nitrogen impaired waters requirements. (Appendix H, Part I)
- -Quinssett Harbor (MA95-25), nitrogen impaired waters requirements. (Appendix H, Part I)
- -Rands Harbor (MA95-78), nitrogen impaired waters requirements. (Appendix H, Part I)
- -Rands Harbor (MA95-78), bacteria impaired waters requirements. (Appendix H, Part III)
- -Wild Harbor (MA95-20), nitrogen impaired waters requirements. (Appendix H, Part I)
- -Megansett Harbor (MA95-19), bacteria impaired waters requirements. (Appendix H, Part III)
- -Herring Brook (MA95-21), bacteria impaired waters requirements. (Appendix H, Part III)
- -Herring Brook (MA95-21), nitrogen impaired waters requirements. (Appendix H, Part I)

The following changes were made that do not affect TMDL and Impaired Waters requirements:

- -Fiddlers Cove (MA95-79), dissolved oxygen, and estuarine bioassessments added to 303(d) list
- -Quinssett Harbor (MA95-25), estuarine bioassessments and nutrient/eutrophication biological indicators added to 303(d) list
- -Rands Harbor (MA95-78), estuarine bioassessments and nutrient/eutrophication biological indicators added to 303(d) list
- -Wild Harbor (MA95-20), estuarine bioassessments and nutrient/eutrophication biological indicators added to 303(d) list
- -Herring Brook (MA95-21), chlorophyll-a added to 303(d) list
- -Wild Harbor River (MA95-68), changed from category 4a to 5.

## **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 this reporting period: 2
Below, report on the educational messages completed during this reporting period. 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):
71,086 social media impressions from Town residents.
Message Date(s): Ongoing
Message Completed for: Appendix F Requirements $\times$ Appendix H Requirements $\times$
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):

The Town updated its existing website with new information, including links and information specific to residents, Commercial and Businesses, Developers and Site Operators, and Industrial Facilities. A link with additional Town-specific stormwater resources is also provided, as well as links to other offsite stormwater-

Town of Falmouth Page 8 related information such as EPA, ThinkBlue, the Massachusetts Stormwater Handbook, and the Cape Cod Commission. Links to the SWMP Plan and IDDE Plan are also provided on the same page. Message Date(s): Ongoing Appendix H Requirements X Message Completed for: Appendix F Requirements × Was this message different than what was proposed in your NOI? Yes O 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): Appendix F Requirements Appendix H Requirements Message Completed for: Was this message different than what was proposed in your NOI? Yes O No O If yes, describe why the change was made:

Add an Educational Message

## **MCM2: Public Participation**

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period**:

SWMP Plan for Download - The Town has posted the SWMP Plan and other relevant information on Town website along with contact information to allow for public comment.

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Was this opportunity different than what was proposed in your NOI? Yes ○ No ●	
Describe any other public involvement or participation opportunities conducted during this report	ting period:
MCM3: Illicit Discharge Detection and Elimination (IDDE)	
Sanitary Sewer Overflows (SSOs)	
Check off the box below if the statement is true.	
☐ This SSO section is NOT applicable because we DO NOT have sanitary sewer	
Below, report on the number of SSOs identified in the MS4 system and removed during this report	ing period.
Number of SSOs identified: 0	
Number of SSOs removed: 0	
MS4 System Mapping	
Below, check all that apply.	
The following elements of the Phase I map have been completed:	
○ Outfalls and receiving waters	
Open channel conveyances	
☐ Interconnections	
☐ Initial catchment delineations	
Optional: Describe any additional progress you made on your map during this reporting period or additional status information regarding your map:	provide
Phase I Mapping - all known outfalls, stormwater BMPs, and receiving waterbodies with impairm been mapped to date. Initial catchment delineations have also been completed based on topograph	

Phase I Mapping - all known outfalls, stormwater BMPs, and receiving waterbodies with impairments have been mapped to date. Initial catchment delineations have also been completed based on topographic mapping and available stormwater system information. Mapping of open channel conveyances and any newly located outfalls is ongoing. Mapping interconnections with other MS4s (e.g. DOT) is ongoing, and it is expected that this will continue as part of DOT's own mapping efforts to be completed under a future TS4 permit.

## **Screening of Outfalls/Interconnections**

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If conducted, please submit any outfall monitoring results from this results should include the date, outfall/interconnection identifier, le sampling, precipitation in previous 48 hours, field screening parameters.	ocation, weather conditions at time of
<ul> <li>The outfall screening data is attached to the email s</li> </ul>	ubmission
○ The outfall screening data can be found at the follo	wing website:
Below, report on the number of outfalls/interconnections screened	during this reporting period.
Number of outfalls screened: 92	
<b>Catchment Investigations</b>	
If conducted, please submit all data collected during this reporting investigations. Also include the presence or absence of System Vul.  The catchment investigation data is attached to the  The catchment investigation data can be found at the	nerability Factors for each catchment. email submission
N/A, none completed to date	
Below, report on the number of catchment investigations completed.  Number of catchment investigations completed this	
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:
IDDE Progress  If illicit discharges were found, please submit a document describing period, and cumulative to date, including location source; descripted date of discovery; and date of elimination, mitigation, or enforcem schedule of removal.   The illicit discharge removal report is attached to the The illicit discharge removal report can be found at	tion of the discharge; method of discovery; ent OR planned corrective measures and me email submission
N/A, none found to date	
Below, report on the number of illicit discharges identified and removed during this reporting period.	noved, along with the volume of sewage
Number of illicit discharges identified: 0	
Number of illicit discharges removed: 0	
Estimated volume of sewage removed: 0	gallons/day

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 (July 1, 2018). 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: **Employee Training** Describe the frequency and type of employee training conducted during the reporting period: IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability; however was completed on August 6, 2020 prior to submittal of this Annual Report. 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: 11 Number of inspections completed: 9 Number of enforcement actions taken: 0 Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

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

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Below, select the option that describes your ordinance or regulatory mechanism progress.

Bylaw, ordinance, or regulations are updated and adopted consistent with permit requirements

Bylaw, ordinance, or regulations are updated consistent with permit requirements but are not

#### **As-built Drawings**

Describe 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:

O Bylaw, ordinance, or regulations have not been updated or adopted

The Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule. As a result of the COVID-19 outbreak, regulations were not updated as planned during Permit Year 2.

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

vet adopted

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 years.	
1471, to be completed during ruture permit years.	

#### **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:

N/A, to be completed during future permit years.						

## **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 completed an inventory of its permittee-owned properties during this permit year. Facilities will be evaluated for potential BMP retrofit opportunities during future permit years.

**MCM6: Good Housekeeping** 

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Below, report on the number of catch basins inspected and cleaned, along with the total volume of mate removed from the catch basins during this reporting period.	rial
Number of catch basins inspected: 650	
Number of catch basins cleaned: 600	
Total volume or mass of material removed from all catch basins: 3,800 cubic yar	ds
Below, report on the total number of catch basins in the MS4 system.	
Total number of catch basins: 6,300	
If applicable:	
Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:	
Not yet applicable.	
Street Sweeping	
Report on street sweeping completed during this reporting period using one of the three metrics below.	
Number of miles cleaned: 600	
O Volume of material removed: 450 cubic yards	
O Weight of material removed: [Select Units]	
O&M Procedures and Inventory of Permittee-Owned Properties	
Below, check all that apply.	
The following permittee-owned properties have been inventoried:	
□ Parks and open spaces	
⊠ Buildings and facilities	
∨ ehicles and equipment	
The following O&M procedures for permittee-owned properties have been completed:	
□ Parks and open spaces	
⊠ Buildings and facilities	
∨ Vehicles and equipment	
Stormwater Pollution Prevention Plan (SWPPP)	
Below, report on the number of site inspections for facilities that require a SWPPP completed during the reporting period.	IS
Number of site inspections completed: 0	

Describe any corrective actions taken at a facility with a SWPPP:

Not applicable, no corrective actions have been taken to date. Note that a SWPPP for the DPW Facility was completed on June 30, 2020. Quarterly site inspections will begin during Year 3.

#### **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			
$\circ$	The results from additional reports or studies are attached to the email submission			
$\circ$	The results from additional reports or studies can be found at the following website(s):			
	ring or studies were conducted on your behalf or if monitoring or studies conducted by other ported to you, a brief description of the type of information gathered or received shall be w:			
N/A, not started	d yet.			

#### **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:

The Town continued updating its stormwater mapping. Every street opening and driveway permit is marked out in the field and revisions to GIS maps are made as needed.

Structural BMP Inspections - all known structural BMPs were inspected in May 2020. Any required maintenance will be performed during Year 3.

## **COVID-19 Impacts**

Optional: If any of the above year 2 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

Public Education - educational materials left in public places is no longer accessible now that the DPW offices are closed to the public.

IDDE Training - training was not performed during this permit year due to COVID-19 social distancing requirements and limited staff availability; however was completed on August 6, 2020 prior to submittal of this Annual Report.

As-Builts and Long-Term O&M - the Town is working on incorporating procedures for submittal of as-builts and require long term operation and maintenance as part of its stormwater regulatory updates to be completed as part of the Year 3 requirements under EPA's pending updated permit schedule. As a result of the COVID-19 outbreak, regulations were not updated as planned during Permit Year 2.

#### **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 3 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ×

- Inspect all outfalls/ interconnections (excluding Problem and Excluded outfalls) for the presence of dry weather flow
- Complete follow-up ranking as dry weather screening becomes available

#### **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
- 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
- Continue investigations of catchments associated with Problem Outfalls
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

Provide any additional details on activities planned for permit year 3 below:

The SWMP Plan and IDDE Plan will be updated during FY-21 to address all work performed through Year 3. This will include incorporating the above items into the SWMP Plan and/or IDDE Plan as necessary, incorporate results from outfall dry weather screening, as well as documenting results of other annual activities below such as BMP inspections.

## Part V: Certification of Small MS4 Annual Report 2020

#### 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			
	[Signatory may be a duly authorized representative]	Date:	9/28/2520		٠.	, *