

**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 Organization:

EPA NPDES Permit Number:

**Primary MS4 Program Manager Contact Information**

Name:  Title:

Street Address Line 1:

Street Address Line 2:

City:  State:  Zip Code:

Email:  Phone Number:

**Stormwater Management Program (SWMP) Information**

SWMP Location (web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical 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: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

<b>Impairment(s)</b>			
<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input type="checkbox"/> Nitrogen	<input type="checkbox"/> Phosphorus
<input checked="" type="checkbox"/> Solids/ Oil/ Grease (Hydrocarbons)/ Metals			
<b>TMDL(s)</b>			
<i>In State:</i>	<input type="checkbox"/> Assabet River Phosphorus	<input checked="" type="checkbox"/> Bacteria and Pathogen	<input type="checkbox"/> Cape Cod Nitrogen
	<input checked="" type="checkbox"/> Charles River Watershed Phosphorus	<input type="checkbox"/> Lake and Pond Phosphorus	
<i>Out of State:</i>	<input type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Metals	<input type="checkbox"/> Nitrogen
			<input type="checkbox"/> Phosphorus
<input type="button" value="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
- Developed written operations and maintenance procedures for parks and open space, buildings and facilities, and vehicles and equipment and added these procedures to the SWMP
- Developed 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
- 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:

Bylaw changes addressing the submission of as-built drawings, waste control, and compliance with the Massachusetts Stormwater Handbook standards have been drafted and provided to Council for review and approval with votes on the changes expected in the Fall of 2020.

Annual Requirements

- Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
- Kept records relating to the permit available for 5 years and made available to the public
- The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
  - This is not applicable because we do not have sanitary sewer
  - This is not applicable because we did not find any new SSOs
  - The updated SSO inventory is attached to the email submission
  - 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:

Training of employees on MS4 requirements has been impacted due to COVID-19 safety requirements. Training activities are on-going and will be complete by the end of September 2020.

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

Annual Requirements

*Public Education and Outreach\**

- 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
- 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:

## Solids, Oil and Grease (Hydrocarbons), or Metals

### Annual Requirements

#### *Good Housekeeping and Pollution Prevention for Permittee Owned Operations*

- Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads
- Prioritized inspection and maintenance for catch basins to ensure that no sump shall be more than 50 percent full; Cleaned catch basins more frequently if inspection and maintenance activities indicated excessive sediment or debris loadings

*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:

Catch basin cleaning SOP adopted in 2020 with results of cleaning now tracked electronically and any basins found to be 50% full scheduled for more frequent inspection and maintenance starting in the Fall of 2020.

## Charles River Watershed Phosphorus TMDL

- Completed Legal Analysis

*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:

*Optional:* Use the box below to provide any additional information you would like to share as part of your self-assessment:

As part of the education effectiveness assessment, the Town posted a stormwater survey and had 344 responses. Approximately 92% of the participants believe that runoff from rain water and snow melt have some impact or a major impact to waterways and approximately 86% of the participants believe that it carries dirt, oil, trash and other pollutants into the storm drain and directly to waterways. Approximately 43% of the participants recall receiving the residential educational flyer. In an effort to reach more residents and due to COVID-19 restrictions on in person flyer distribution, the Town has shifted to distributing educational materials online via social media.

### 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?

- Yes  
 No

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

As a result of map updates and more detailed outfall priority ranking reviews, a number of outfalls that had previously been identified as Town outfalls were determined to actually be private or state agency outfalls or the outfalls were found not to meet the CWA definition of outfalls (i.e. they discharged to basins or culverts and were not the final discharge point to a surface water body). The Town outfall count has been revised from 551 to 494.

## 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:**

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:1A - Brochures for Residences**

Message Description and Distribution Method:

Residential mailer updated with proper fertilizer use message and posted to Town's stormwater website.

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Prepare and distribute to all residents appropriate stormwater management messages annually. Residential Mailer was posted on 4/1/2020. It was also included in the Town Newsletter, which is directly sent to 3,000+ residents and is posted to Twitter (3,351 followers), Facebook (1,271 followers) and Instagram (1,163). It is also shared on a community FB page (All about Franklin) that has 15,000+ members.

Message Date(s):

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:

The message was the same as planned, but delivery was revised from mailing to posting on-line, in the Town newsletter, and on social media.

#### **BMP:1B - Displays for Businesses, Institutions, and Commercial Facilities**

Message Description and Distribution Method:

Given COVID-19 state of affairs, the current display at the DPW Administration building and flyers left on the counters are not being seen and taken since public buildings remain closed. In response, the Town distributed materials through the mail. Year 2 message is about proper stormwater infrastructure maintenance.

Targeted Audience:

Responsible Department/Parties:

## Measurable Goal(s):

Update posters and displays with appropriate non-residential stormwater pollution control messages annually. Approximately 60 flyers were taken from the Town Hall / DPW prior to COVID-19. An additional 100 flyers were mailed to Industrial (82) businesses and Institutions (18). Flyers have been added to the DBA license application in Viewpoint for future distributions.

Message Date(s): July 1, 2019 through June 30, 2020

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:1C - Brochures for Developers**

## Message Description and Distribution Method:

Brochures educating construction developers about soil erosion controls were distributed with the online Soil Erosion and Sediment Control Plan permits application via Viewpoint Cloud.

Targeted Audience: Developers (construction)

Responsible Department/Parties: GIS Manager

## Measurable Goal(s):

Preparation and distribution to local developers of stormwater messages targeting development community every 2 years. Two soil and erosion sediment control plans were submitted to the Town and two brochures were distributed in Year 2.

Message Date(s): July 1, 2019 through June 30, 2020

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:1D - Brochures for Industrial Facilities**

## Message Description and Distribution Method:

Brochures educating industrial facility personnel on gas, oil, and grease spill prevention and controls were distributed at Town facilities in Year 2.

Targeted Audience: Industrial Facilities

Responsible Department/Parties: GIS Manager

## Measurable Goal(s):

Preparation and distribution of stormwater messages targeting industrial operations every 2 years. For this off year, approximately 60 flyers were taken from the Town Hall / DPW prior to COVID-19. Upon restrictions to Town offices, the industrial flyers were posted to the Town's Stormwater website.

Message Date(s): July 1, 2019 through June 30, 2020

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:1E - Website Updates for General Public**

## Message Description and Distribution Method:

A Stormwater Division page was added to the DPW website directory and includes links to download the latest Year 2 SWMP and provide comment, as well as electronic copies of the educational materials for the residents, businesses, industrial facilities, and construction developers. The Town's stormwater website was updated to include the latest updated educational materials, interactive web maps, stormwater presentations, and a stormwater survey.

Targeted Audience: General Public

Responsible Department/Parties: GIS Manager and DPW Administration

## Measurable Goal(s):

Promote stormwater awareness by linking key stormwater information, regulations, and activity updates; Goal to continue to increase website hits. The stormwater website received 3,908 recorded hits in Year 2.

Message Date(s): July 1, 2019 through June 30, 2020

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:1F - Special Events for General Public**

## Message Description and Distribution Method:

A stormwater information session about MS4 compliance and a potential stormwater utility was held on March 6, 2020 at the Town Council Chambers. Discussion topics included the hiring of a new Stormwater Manager, the proposed stormwater budget, and adoption of a stormwater utility.

Targeted Audience: General Public



Responsible Department/Parties: GIS Manager

Measurable Goal(s):

Provide annual hands-on stormwater education event and track attendance. Approximately 18-20 people attended the March 6th event. Event was broadcasted on local cable news network.

Message Date(s): March 6, 2020

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:1G - Brochures for Dog Owners and Residents**

Message Description and Distribution Method:

Brochures educating dog owners about proper pet waste management are distributed along with the on-line dog license registration via Viewpoint Cloud. This message also meets permit requirements for enhanced BMP requirements under Appendix F.A.III.

Targeted Audience: Dog Owners/ Residents

Responsible Department/Parties: GIS Manager and Town Clerk

Measurable Goal(s):

Update and disseminate with dog license information annually and make available at select public locations. 2,847 pamphlets were distributed in Year 2.

Message Date(s): July 1, 2019 through June 30, 2020

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:1H - Brochures for Septic Tank Owners**

Message Description and Distribution Method:

Brochures educating septic system owners on septic system care and maintenance were distributed at the Health Department and DPW offices. This message is also distributed as part of the enhanced BMP requirements of Appendix F.A.III.

Targeted Audience: Septic System Owners

Responsible Department/Parties: GIS Manager and Health Department

Measurable Goal(s):

Update and distribute biannually to septic system owners. Approximately 60 flyers were taken.

Message Date(s): July 1, 2019 through June 30, 2020

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:

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:

As part of the Public Involvement and Participation Program, the Town has posted the revised SWMP online for public review and no comments were received during the Year 2 reporting year. During the Year 2 reporting year, DPW crews completed 786 catch basin/storm drain stencil additions. In Year 3, BMP 2C will be replaced by the rain barrel rebate program due to liability issues with having locals perform stenciling. The Town continues to operate the illicit stormwater discharge hotline and track any phone calls. During Year 2, the stormwater hotline was active, but no calls were received. On April 25, 2020, the Town sponsored an Earth Day clean-up event and approximately 130 people attended and several truckloads of trash were collected and disposed of by the DPW.

Was this opportunity different than what was proposed in your NOI? Yes  No

Describe any other public involvement or participation opportunities conducted during this reporting 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 reporting period**.

Number of SSOs identified:

Number of SSOs removed:

#### 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
- Municipally-owned stormwater treatment structures
- Waterbodies identified by name and indication of all use impairments
- Initial catchment delineations

*Optional:* Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

Map updates for catchment and interconnections completed. Town outfall count has been revised from 551 to 494.

#### 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.

- The outfall screening data is attached to the email submission
- The outfall screening data can be found at the following website:

Below, report on the number of outfalls/interconnections screened **during this reporting period**.

Number of outfalls screened:

#### 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
- The catchment investigation data can be found at the following website:

*Below, report on the number of catchment investigations completed during this reporting period.*

Number of catchment investigations completed this reporting period:

*Below, report on the percent of catchments investigated to date.*

Percent of total catchments investigated:

*Optional: Provide any additional information for clarity regarding the catchment investigations below:*

**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.*

- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following website:

*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:

Number of illicit discharges removed:

Estimated volume of sewage removed:  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:

Total number of illicit discharges removed:

*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**:

The Town has developed the training materials for the Illicit Discharge Detection and Elimination and the Good Housekeeping programs and the trainings are scheduled for September 2020.

### **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:

Number of inspections completed:

Number of enforcement actions taken:

*Optional:* Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

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

#### **Ordinance or Regulatory Mechanism**

*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 yet adopted
- Bylaw, ordinance, or regulations have not been updated or adopted

#### **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:

Final regulation change approval was delayed by COVID-19; currently these regulations are scheduled to go to the Town Council in the Fall of 2020.

### **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:

Informal guidelines are being reviewed and the Town will develop a report assessing the current street design and parking lot guidelines in Year 4.

### **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:

Current bylaws have been reviewed and potential revisions noted for inclusion in the Year 4 report.

### **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 has begun to track roadway reconstruction projects on a case by case basis to identify opportunities for impervious reductions. The Town will continue to evaluate parking lots, buildings, and maintenance yards for additional opportunities to reduce impervious areas and develop an inventory of properties that could be modified or retrofitted with BMPs.

## **MCM6: Good Housekeeping**

### **Catch Basin Cleaning**

*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**.*

Number of catch basins inspected:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:  tons

*Below, report on the total number of catch basins in the MS4 system.*

Total number of catch basins:

*If applicable:*

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

### **Street Sweeping**

Report on street sweeping completed **during this reporting period** using one of the three metrics below.

- Number of miles cleaned:
- Volume of material removed:  [Select Units]
- Weight of material removed:  tons

### **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
- Vehicles 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 this reporting period**.*

Number of site inspections completed:

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

Quarterly inspection scheduled to begin in the Fall of 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
- The results from additional reports or studies can be found at the following website(s):

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

**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:

**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:

BMP 1B - Displays for Businesses, Institutions, and Commercial Facilities: Given COVID-19 state of affairs, the current display at the DPW Administration building and flyers left on the counters are not being seen and taken since public buildings remain closed. The Town is posting materials on their website and have developed an inventory of commercial properties and institutions and evaluate different means of distribution of information in Year 3.

BMP 1H - Brochures for Septic Tank Owners: Given COVID-19 state of affairs, the flyers left on the Health Department and DPW counters are not being seen and taken since public buildings remain closed. The Town is posting materials on the Health Department website and have added the flyer to the septic hauler and installer permits on Viewpoint.

BMP 3F - Conduct dry weather screening: Investigations delayed due to COVID-19. Field work was able to begin on June 11, 2020.



BMP 4D - Waste Control: COVID-19 concerns impacted Town Council meetings and delayed their review and approval of modifications to regulations.

BMP 5A - As-Built Plans for On-Site Stormwater Control: COVID-19 concerns delayed Town review and approval of modifications to regulations.

BMP 5E - Massachusetts Stormwater Handbook Compliance: COVID-19 concerns delayed Town review and approval of modifications to regulations.

BMP 6H - Inspections and maintenance of stormwater treatment structures: Some BMP maintenance has been delayed due to COVID-19 with 12 rain gardens having been maintained. Inspections and maintenance will ramp back up in Year 3.

### **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:



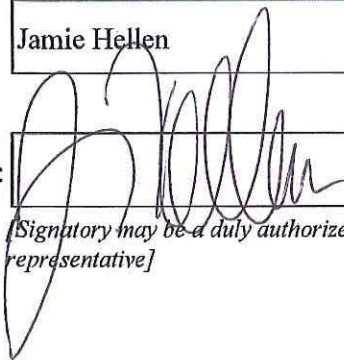
### Part V: Certification of Small MS4 Annual Report 2020

#### **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:

Title:

Signature: 

Date:

*[Signatory may be a duly authorized representative]*