

**Year 6 Annual Report**  
**Massachusetts Small MS4 General Permit**  
**Reporting Period: July 1, 2023-June 30, 2024**

*\*\*Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites\*\**

*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, 2023 and June 30, 2024 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 (publicly available 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>

### Impairment(s)

Bacteria/Pathogens       Chloride       Nitrogen       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.

### 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 publicly available website:

Updated system map due in year 10 with information from completed catchment investigations

Provided training to employees involved in IDDE program within the reporting period

Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters

All curbed roadways were swept at least once within the reporting period

Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt

Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities

- Updated inventory of all permittee owned facilities as necessary
- O&M programs for all permittee owned facilities have been completed and updated as necessary
- Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Inspected all permittee owned treatment structures (excluding catch basins)

*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:

The Town reviewed the need to develop and implement SWPPPs at Town-owned or operated facilities in accordance with Part 2.3.7.b of the Permit. These facilities included the Department of Public Works and Natural Resources Facility and Transfer Station/Landfill site. The Town, with support from their consultant, determined that SWPPPs were not required because these facilities do not discharge to the MS4 or surface waters. The facilities have storm drain infrastructure that discharges to subsurface infiltration systems with no off-site discharges.

## **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
  - This is not applicable because there are no septic systems present

*\* 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:

The Town distributed pet waste messages during dog license issuance and renewal through the Town Clerk's office during PY6.

The Town provides messaging to renters regarding pet waste management and places Mutt Mitts for pet waste pick up in recreational areas.

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

### Annual Requirements

#### *Public Education and Outreach\**

- 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
- 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:

The Town has conducted street and Town owned parking lot sweeping activities throughout PY6 with a Tymco street sweeper. The Town was not able to sweep all roads in this permit year.

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

Phase 2 of the Town's sanitary sewer system project is currently under construction. Phase 3 of the project is under design and permitting with an anticipated funding request date in May 2025. All newly constructed sanitary sewers will be added to the MS4 map and inventory.

The Town of Orleans continues to appropriate over \$200,000 annually to fund stormwater quality efforts, including the design and retrofit of stormwater treatment measures. This has improved water quality and reduced the number of shellfish bed closures during shellfishing season.

## 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:

The Town of Orleans' list of impaired waterbodies has been updated since the original NOI. The list has been updated to reflect the "Final Massachusetts Integrated List of Waters for the Clean Water Act 2022 Reporting Cycle". The updated list of impaired waterbodies and impairments was incorporated into the SWMP update.

## 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: Pesticide Home Rule Petition 2023**

Message Description and Distribution Method:

The Orleans Select Board passed the Orleans Pesticide Home Rule Petition at the Fall Town Meeting on October 16, 2023. Following the passing of this petition the Town posted a news bulletin on their website. This bulletin informed the public about the petition, the period for public input and letters regarding the petition, and why it was passed. The petitions goal is to reduce the use of pesticides in the Town of Orleans and therefore reduce the impacts of pesticides on water quality and public health. The news bulletin provides details about how chemicals from pesticides infiltrate soils and groundwater and contribute to water impairments. The news bulletin on the Pesticide Home Rule Petition can be found on the Towns website here: <https://www.town.orleans.ma.us/1335/Pesticide-Home-Rule-Petition-2023>

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

The goal of the Pesticide Home Rule Petition is to reduce pesticide use in the Town of Orleans and educate the public on the impacts pesticides have on water quality, public health, and the environment. The petition was slated to go before the Massachusetts Joint Committee of Environment and Natural Resources for statewide consideration.

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:

#### **BMP: Dogs on Beaches**

Message Description and Distribution Method:

The Orleans Department of Public Works and Natural Resources posted regulations on dogs on Town owned recreation areas. These regulations prohibit dogs from many Town owned beaches, lakes, and trails during spring and summer months. These regulations can be found on the Towns website here: <https://www.town.orleans.ma.us/DocumentCenter/View/1430/Dogs-on-the-Beaches?bidId=>

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works and Natural Resources

Measurable Goal(s):

These regulations prohibit dogs from Town owned beaches, lakes, and trails. This prevents dog waste from contaminating waterbodies.

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: Fertilizer Home Rule Petition 2022**

Message Description and Distribution Method:

The Orleans Select Board unanimously voted to pass the Fertilizer Home Rule Petition during the Fall Town Meeting on October 17, 2022. This petition would prohibit the application of fertilizer in the Town of Orleans to protect water quality, natural resources, and public health. With the passing of this petition the Town posted a news bulletin on their website to inform the public about the petition and their intention to bring it in front of the Massachusetts State Legislator to allow the Town to pass the petition. This news bulletin is regularly updated as this fertilizer petition receives public input and review from State legislators. The news bulletin informs the public about how detrimental fertilizer is on water quality and the environment. The Fertilizer Home Rule Petition 2022 news bulletin can be found on the Towns website here: <https://www.town.orleans.ma.us/1109/4397/Fertilizer-Home-Rule-Petition-2022>

Targeted Audience: Residents

Responsible Department/Parties: The Orleans Select Board

Measurable Goal(s):

To inform the public on the Fertilizer Home Rule Petition to prohibit the use of fertilizer and how fertilizer impacts water quality and the environment. The Town hopes that Massachusetts State Legislators will pass the petition and allow Orleans to prohibit fertilizer use.

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: Downtown Area Collection System Layout****Message Description and Distribution Method:**

The Town of Orleans posted a map of their proposed sanitary sewer project on the Towns website for public review. This map informs the public about the location and size of the proposed sewer mains, laterals, manholes, and pump stations. This project significantly increases the Towns sanitary sewer network and is currently under construction. The Downtown Area Collection System Layout map is available on the Towns website here: <https://www.town.orleans.ma.us/DocumentCenter/View/1060/Map-of-Phase-1-Downtown-PDF>

Targeted Audience: Residents

Responsible Department/Parties: Engineering

**Measurable Goal(s):**

To inform the public about the proposed sanitary sewer system in the downtown Orleans area.

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: Stormwater Web Page****Message Description and Distribution Method:**

The Orleans Department of Public Works and Natural Resources has a Stormwater page on the Towns website. This page has multiple links to resources that the public can access to inform them about the Towns' stormwater bylaws, best practices, and publicly available documents. The website also includes a section called "After the Storm". This brings users to a web page with links to three educational YouTube videos educating the public about stormwater. The stormwater web page can be found on the Towns website here: <https://www.town.orleans.ma.us/445/Stormwater>

Targeted Audience: Residents

Responsible Department/Parties: Department of Public Works and Natural Resources

**Measurable Goal(s):**

To provide educational resources to the public regarding stormwater.

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:

[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**:

The Town of Orleans has the 2022 Stormwater Management Plan posted to the Towns website for public review and comment. The 2024 Stormwater Management Plan has not yet been posted as of the submittal of this Annual Report but will be posted within this calendar year. The report can be found here: <https://www.town.orleans.ma.us/448/Stormwater-Management-Program-Documents>

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**:

The Orleans Pond Coalition held their annual Celebrate Our Waters Weekend September 15 through 17, 2023. The weekend encourages the public to participate in outdoor activities, wastewater facilities tours, educational talks, and more to raise awareness of the natural resources in the Town of Orleans.

The public may also attend and participate in Select Board and Town Meetings.

## 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: 0

Number of SSOs removed: 0

### MS4 System Mapping

Percent of Phase II map complete: 100

*Optional:* Provide additional status information regarding your map:

The Town updated the Phase II MS4 map to reflect findings from their dry weather outfall screening and investigation activities. Orleans is also in the process of installing their first municipal sanitary sewer system. The location of the new pipes and structures will be added to the MS4 map when the installation of the new sewer system is complete.

### **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. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.*

- No outfalls were inspected
- The above referenced outfall screening data is attached to the email submission
- The above referenced outfall screening data can be found at the following publicly available website:

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

Number of outfalls screened:  0

*Below, report on the percent of outfalls/interconnections screened **to date**.*

Percent of outfalls screened:  100

*Optional:* Provide additional information regarding your outfall/interconnection screening:

Dry weather screenings of all 123 outfalls in Orleans were attempted in 2020. No additional outfall screenings occurred in PY6.

### **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.*

- No catchment investigations were conducted
- The catchment investigation data is attached to the email submission
- The catchment investigation data can be found at the following publicly available website:

*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:  70

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

The Town conducted catchment investigations on the Town's top 80 priority catchments during Permit Year 5. No further catchment investigations were conducted in PY6.

### **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.*

- No illicit discharges were found
- The illicit discharge removal report is attached to the email submission
- The illicit discharge removal report can be found at the following publicly available 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: 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 this reporting period**:

An employee training was held on December 12, 2023 for staff of the Town of Orleans. The training reviewed the MS4 General Permit, good housekeeping practices, how to identify illicit discharges and where to report them, and past IDDE work.

*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: 0

Number of enforcement actions taken: 0

*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**

Date update was completed (due in year 3): Revised 2019

Website of ordinance or regulatory mechanism: <https://ecode360.com/OR1150/laws/LF1122813.pdf>

### **As-built Drawings**

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received: 0

*Optional:* Enter any additional information relevant to the submission of as-built drawings:

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

Below, describe any changes made or planned to be made to local regulations and guidelines based on the report completed in Year 4:

The Town of Orleans is in the process of reviewing their existing bylaws and regulations to determine possible changes to encourage the reduction of impervious cover. This review is currently in progress. The Town will continue to report on their progress.

## **Green Infrastructure Report**

Below, describe progress towards making green infrastructure practices allowable based on the report completed in Year 4:

The Town of Orleans is in the process of reviewing their existing bylaws and regulations to determine possible changes to make green stormwater infrastructure practices more available. This process is currently in progress. The Town will continue to report on their progress.

## **Retrofit Properties Inventory**

Below, list remaining permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas (must maintain a minimum of 5 sites in inventory until less than 5 sites remain):

- Doane Road Landing
- Champlain Road Landing
- Snow Shore Road Landing
- Portanimicut Landing
- Cove Road Landing
- Old Colony Way Pavement Reduction
- Herring Brook Road

Below, list all properties that have been modified or retrofitted with BMPs to mitigate impervious area that were inventoried as part of 2.3.6.d of the permit and the type of BMP(s) implemented. Non-MS4 owned properties that have been modified or retrofitted with BMPs to mitigate impervious area may also be listed, but must be indicated as non-MS4.

The stormwater improvement projects at Doane Road Landing, Champlain Road Landing, Snow Shore Road Landing, and Portanimicut Landing projects were completed in PY5.

Stormwater improvement projects are under design and permitting for Herring Brook Road (not originally in the retrofit inventory) and Cove Road Landing. Both of these projects will reduce pavement cover and implement stormwater. The Town expects that construction for these two projects will begin in Winter 2024/2025.

The Town proactively maintains a list of retrofit properties and will continue to update until the list of backlog properties is completed.

## **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: 25

Number of catch basins cleaned: 25

Total volume or mass of material removed from all catch basins: 2 cubic yards

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

Total number of catch basins: 1,539

*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: 1 cubic yards

Weight of material removed:  [Select Units]

### **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: 0

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

The Town reviewed the need to develop and implement Stormwater Pollution Prevention Plans (SWPPPs) at Town owned or operated facilities. These facilities include the Department of Public Works and Natural Resources Facility and Transfer Station/Landfill sites. The Town determined that SWPPPs are not needed for these facilities since they do not discharge to the MS4 or a surface water. The facilities have storm drain infrastructure that discharge to subsurface infiltration systems with no off-site discharges for all applicable storm event design criteria.

### **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 publicly available 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:

In accordance with Appendix H of the MS4 Permit the Town of Orleans completed a Nitrogen Source Identification Report (NSIR) for Areys Pond and Pleasant Bay watersheds. The NSIR is attached to the email submission and available for public review at the Orleans Department of Public Works.

**Additional Information**

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.

Construction of Phase 2 of the sanitary sewer system installation is currently underway. This project will result in \$20 million worth of sewer upgrades for areas that were previously served by onsite waste disposal system. Phase 3 of the project is currently under design and permitting with an anticipated funding request date of May 2025.

**Year 7****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 7 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree

- Complete investigations of catchments associated with Problem Outfalls
- Complete investigations of catchments where any information gathered on the outfall/interconnection identifies sewer input

**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 curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- 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
- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements
- Inspect all permittee owned treatment structures (excluding catch basins)
- Identify additional permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas so that the permittee maintains a minimum of 5 sites in their inventory, until such a time when the permittee has less than 5 sites remaining

Provide any additional details on activities planned for permit year 7 below:

The Town of Orleans has designated funding for various water quality and wastewater planning projects. These projects are planned to be implemented over 20 years, from Fiscal Year 2022 to Fiscal Year 2041. The Town has proposed a Watershed Wide Permeable Reactive Barrier Project for funding in Fiscal Year 2025 (Permit Year 7). Additionally, the Orleans Department of Public Works has budgeted a new regenerative air street sweeper to replace their existing sweeper. This will improve street sweeping efficiency.

## Part V: Certification of Small MS4 Annual Report 2024

### **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.

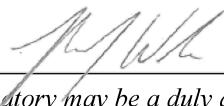
Name:

Richard J. Waldo

Title:

Public Works &amp; Natural Resources Director

Signature:

*[Signatory may be a duly authorized representative]*

Date:

9/23/2024