

Stormwater Management Program (SWMP)

Burlington

25 Center Street, Burlington, MA 01803

EPA NPDES Permit Number MAR041030

Certification

Authorized Representative (Optional): All reports, including SWPPPs, inspection reports, annual reports, monitoring reports, reports on training and other information required by this permit must be signed by a person described in Appendix B, Subsection 11.A or by a duly authorized representative of that person in accordance with Appendix B, Subsection 11.B. If there is an authorized representative to sign MS4 reports, there must be a signed and dated written authorization.

The authorization letter is:

- ☐ Attached to this document (document name listed below)

- ☐ Publicly available at the website below

“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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Printed Name

Signature

Date

Printed Name

Signature

Date

[Click Here for Revisions](#)

Background

Stormwater Regulation

The Stormwater Phase II Final Rule was promulgated in 1999 and was the next step after the 1987 Phase I Rule in EPA's effort to preserve, protect, and improve the Nation's water resources from polluted stormwater runoff. The Phase II program expands the Phase I program by requiring additional operators of MS4s in urbanized areas and operators of small construction sites, through the use of NPDES permits, to implement programs and practices to control polluted stormwater runoff. Phase II is intended to further reduce adverse impacts to water quality and aquatic habitat by instituting the use of controls on the unregulated sources of stormwater discharges that have the greatest likelihood of causing continued environmental degradation. Under the Phase II rule all MS4s with stormwater discharges from Census designated Urbanized Area are required to seek NPDES permit coverage for those stormwater discharges.

Permit Program Background

On May 1, 2003, EPA Region 1 issued its Final General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (2003 small MS4 permit) consistent with the Phase II rule. The 2003 small MS4 permit covered "traditional" (i.e., cities and towns) and "non-traditional" (i.e., Federal and state agencies) MS4 Operators located in the states of Massachusetts and New Hampshire. This permit expired on May 1, 2008 but remained in effect until operators were authorized under the 2016 MS4 general permit, which became effective on July 1, 2018.

Stormwater Management Program (SWMP)

The SWMP describes and details the activities and measures that will be implemented to meet the terms and conditions of the permit. The SWMP accurately describes the permittees plans and activities. The document should be updated and/or modified during the permit term as the permittee's activities are modified, changed or updated to meet permit conditions during the permit term. The main elements of the stormwater management program are (1) a public education program in order to affect public behavior causing stormwater pollution, (2) an opportunity for the public to participate and provide comments on the stormwater program (3) a program to effectively find and eliminate illicit discharges within the MS4 (4) a program to effectively control construction site stormwater discharges to the MS4 (5) a program to ensure that stormwater from development projects entering the MS4 is adequately controlled by the construction of stormwater controls, and (6) a good housekeeping program to ensure that stormwater pollution sources on municipal properties and from municipal operations are minimized.

Town Specific MS4 Background (optional)

Small MS4 Authorization

The NOI was submitted on

The NOI can be found at the following (document name or web address):

Authorization to Discharge was granted on

The Authorization Letter can be found (document name or web address):

Stormwater Management Program Team

SWMP Team Coordinator

Name	Eileen Coleman	Title	Asst. Conservation Administrator
Department	Conservation		
Phone Number	781-270-1655	Email	ecoleman@burlington.org
Responsibilities	Coordinate Stormwater Committee and manage documentation. Responsible for water sampling, education and outreach.		

SWMP Team

Name	Paul Sagarino	Title	Town Administrator
Department			
Phone Number	781-270-1600	Email	psagarino@burlington.org
Responsibilities	Signatory under whom documentation was prepared.		

Name	Susan Lumenello	Title	Director of Public Health
Department	Public Health		
Phone Number	781-270-1955	Email	slumenello@burlington.org
Responsibilities	Administer IDDE Bylaw, Control of Toxic and Hazardous Material Bylaw, Regulations for Stormwater and Runoff Management. Run hazardous Waste Collection.		

Name	John Sanchez	Title	Director of Public Works
Department	Public Works		
Phone Number	781-270-1670	Email	jsanchez@burlington.org
Responsibilities	Implement IDDE program. Monitor outfalls. Maintain system map.		

Name	Christine Mathis	Title	Environmental Engineer
Department	Public Health		
Phone Number	781-270-1955	Email	cmathis@burlington.org
Responsibilities	Administer IDDE Bylaw, Control of Toxic and Hazardous Material Bylaw, Regulations for Stormwater and Runoff Management. Run hazardous Waste Collection.		

Name	Tom Hayes	Title	Town Engineer
Department	Engineering		
Phone Number	781-270-1640	Email	thayes@burlington.org
Responsibilities	Implement IDDE program. Monitor outfalls. Maintain system map.		

Name	Steve Yetman	Title	Fire Chief
Department	Fire		
Phone Number	871-270-1925	Email	syetman@burlington.org
Responsibilities			

Name	Kevin Keene	Title	Highway Superintendent
Department	DPW - Highway		
Phone Number	781-270-1676	Email	kkeene@burlington.org
Responsibilities	Catch basin cleaning, street sweeping, winter road maintenance, infrastructure maintenance and repair.		

Name	Brendan Egan	Title	Director of Parks & Recreation
Department	Parks & Recreation		
Phone Number	781-270-1695	Email	began@burlington.org

Responsibilities

Name

Rachel Caplan

Title

DPW Operations Analyst

Department

DPW

Phone Number

781-270-7611

Email

rcaplan@burlington.org

Responsibilities

Provides technical support. Coordinates staff training.

Name

Kristen Kassner

Title

Director of Planning

Department

Planning

Phone Number

781-270-1645

Email

kkassner@burlington.org

Responsibilities

Bylaw and regulation changes, implementation of site plan policy and review procedures

Name

John Keeley

Title

Conservation Administrator

Department

Conservation

Phone Number

781-270-1655

Email

jkeeley@burlington.org

Responsibilities

Name

Robert Cunha

Title

Director of Operations, Burlington Public Schools

Department

Burlington Public Schools

Phone Number

781-270-1814

Email

bob.cunha@bpsk12.org

Responsibilities

Add SWMP Member

Receiving Waters

The following table lists all receiving waters, impairments and number of outfalls discharging to each waterbody segment.

OR

The information can be found in the following document or at the following web address:

The Notice of Intent (p2) filed September 26, 2018

Waterbody segment that receives flow from the MS4	Number of outfalls into receiving water segment	Chloride	Chlorophyll-a	Dissolved Oxygen/DO Saturation	Nitrogen	Oil & Grease/PAH	Phosphorus	Solids/ TSS/ Turbidity	E. coli	Enterococcus	Other pollutant(s) causing impairments
Vine Brook (MA83-06 in Burlington)	117	☐	☐	☐	☐	☐	☒	☐	☒	☐	
Long Meadow Brook (MA83-11 in Burlington)	31	☐	☐	☐	☐	☐	☒	☐	☒	☐	
Sandy Brook (MA83-13 in Burlington)	35	☐	☐	☐	☐	☐	☒	☐	☒	☐	
Shawsheen River (MA83-17 outside Burlington)	61	☐	☐	☒	☐	☐	☒	☐	☐	☐	
Lubbers Brook (MA92-05 outside Burlington)	36	☐	☐	☐	☐	☐	☒	☐	☐	☐	
Ipswich River (MA92-06 outside Burlington)	29	☐	☐	☒	☐	☐	☒	☐	☐	☐	Mercury in fish tissue
Sawmill Brook	54	☐	☐	☐	☐	☐	☒	☐	☐	☐	
Maple Meadow Brook (MA92-04 outside Burlington)	12	☐	☐	☐	☐	☐	☒	☐	☐	☐	
Halls Brook Tributary	3	☐	☐	☐	☐	☐	☒	☐	☐	☐	
Cummings Brook Tributary (MA71-10 outside Burlington)	6	☐	☐	☐	☐	☐	☒	☐	☐	☐	
Little Brook	35	☐	☐	☐	☐	☐	☒	☐	☐	☐	
		☐	☐	☐	☐	☐	☐	☐	☐	☐	
		☐	☐	☐	☐	☐	☐	☐	☐	☐	
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		☐	☐	☐	☐	☐	☐	☐	☐	☐	

[Click here to lengthen table](#)

Eligibility: Endangered Species and Historic Properties

*Reminder: The proper consultations and updates to the SWMP must be conducted for construction projects related to your permit compliance where Construction General Permit (CGP) coverage, which requires its own endangered species and history preservation determination, is NOT being obtained.

Attachments:

- ☒ The results of Appendix C U.S. Fish and Wildlife Service endangered species screening determination
- ☒ The results of the Appendix D historic property screening investigations
- ☐ If applicable, any documents from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), or other Tribal representative to mitigate effects

These attachments are required within one year of the permit effective date and are:

- ☒ Attached to this document (document names listed below)

<https://www.epa.gov/npdes-permits/regulated-ms4-massachusetts-communities>

- ☐ Publicly available at the website listed below

Under what criterion did permittee determine eligibility for ESA?

- ☐ Criterion A ☐ Criterion B ☒ Criterion C

Under what criterion did permittee determine eligibility for Historic Properties?

- ☒ Criterion A ☐ Criterion B ☐ Criterion C

Below add any additional measures for structural controls that you're required to do through consultation with U.S. Fish and Wildlife Service (if applicable):

Below add any additional measures taken to avoid or minimize adverse impacts on places listed, or eligible for listing, on the NRHP, including any conditions imposed by the SHPO or THPO (if applicable):

MCM 1

Public Education and Outreach

Permit Part 2.3.2

Objective: The permittee shall implement an education program that includes educational goals based on stormwater issues of significance within the MS4 area. The ultimate objective of a public education program is to increase knowledge and change behavior of the public so that the pollutants in stormwater are reduced.

Examples and Templates:

[EPA's Stormwater Education Toolbox](#)

[MassDEP's Stormwater Outreach Materials](#)

Other templates relevant to MCM 1 can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#peo>

BMP:Pool & Spa Water Drainage

BMP Number (Optional) 1-A

Document Name and/or Web Address:

Description:

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

BMP:Salt/de-icing use and storage

BMP Number (Optional) 1-B

Document Name and/or Web Address:

Description:

Targeted Audience:

Responsible Department/Parties:

Measurable Goal(s):

Message Date(s):

BMP: Sediment & erosion control practices & permitting information

BMP Number (Optional) 1-C

Document Name and/or Web Address: Do I need an erosion control permit? http://www.burlington.org/community_development/do_i_need_to_file.php

Erosion & Sediment Control Permit application: http://www.burlington.org/community_development/docs/stormwater_bylaw_application.pdf

Description:

Develop and distribute sediment and erosion control practices and permitting information. Mail to developers/contractors, including licensed utility contractors. Post information on all Town permitting webpages.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Conservation, Building, DPW, Planning

Measurable Goal(s):

Assess Conservation & Planning inspections to compare numbers of violations annually before and after mailing/posting. Count number of projects applying for permits. Ensure information is posted on all Town permitting webpages.

Message Date(s): March 2020

BMP: Industrial materials storage information

BMP Number (Optional) 1-D

Document Name and/or Web Address:

Description:

Develop & distribute industrial materials storage information.

Targeted Audience: Industrial facilities

Responsible Department/Parties: Health Department, Conservation

Measurable Goal(s):

Compile list of industrial sector companies. Mail material storage information to industrial sector & in annual Hazardous Materials Storage Registrations mailing (record numbers sent).

Message Date(s): January 2020

BMP: Stormwater infiltration program

BMP Number (Optional) 1-E

Document Name and/or Web Address: Water Pollution & Stormwater page, town website: http://www.burlington.org/community_development/stormwater_management.php
Think Blue video posted on BCAT TV and social media: https://twitter.com/ConCom_01803/status/1061979626665361409

Description:

Conduct program to encourage on-site stormwater infiltration and provide general stormwater facts to public. Highlight/post additional information on Town website e.g redirect downspouts, rain gardens, permeable surfaces, etc.
Display materials in Library.
Run PSA on BCAT & other local media.
Run Rain Barrel Program.
Distribute information at Town events e.g., Health Fair, Town Elections.
Reverse 911 if there is a water ban.

Targeted Audience: Residents

Responsible Department/Parties: Conservation, DPW, Health, Recreation, Library

Measurable Goal(s):

Record hits on Town Website stormwater page.
Display stormwater materials in library for one month, estimate number of library patrons.
Count how many time PSA is played on BCAT & social media and estimate viewership.
Sell 200 Rain Barrels during next sales event.
At Town events (e.g., Health Fair, Town Elections), record number of brochures distributed or residents questions answered.
Track residents reached by Reverse 911 if there is a water ban.

Message Date(s): Ongoing

BMP: Waste & dumpster management

BMP Number (Optional) 1-F

Document Name and/or Web Address:

Description:

Develop and distribute waste and dumpster management information. Include in annual mailings of Food Permits (Fall) & Hazardous Materials Storage Registrations (January).

Targeted Audience: Businesses, institutions and commercial facilities

Responsible Department/Parties: Conservation, Health

Measurable Goal(s):

Reduce numbers of complaints regarding waste/dumpsters in year following mailing.

Message Date(s): January 2020 (Hazardous registrations) & Fall 2020 (food permits)

BMP: LID

BMP Number (Optional) 1-G

Document Name and/or Web Address:

Description:

Encourage consideration and use of LID techniques. Create display in Town Hall Annex lobby, and post additional links and resources on all Town permitting webpages and on social media.

Targeted Audience: Developers (construction)

Responsible Department/Parties: Conservation, Planning

Measurable Goal(s):

Increase LID use. Evaluate whether LID use is being proposed more frequently in permitting applications in each year subsequent to permit implementation in 2018.

Message Date(s):

BMP: Parking lot surface condition improvements

BMP Number (Optional) 1-H

Document Name and/or Web Address:

Description:

Compile information on known parking lot surface conditions at industrial sector companies, and mail targeted information regarding their maintenance.

Targeted Audience: Industrial facilities

Responsible Department/Parties: Conservation

Measurable Goal(s):

Record numbers of information packets mailed to industrial sector companies.

Message Date(s):

BMP: Dog Waste Reduction

BMP Number (Optional) 1-I

Document Name and/or Web Address: Water Pollution & Stormwater page on Town website: http://www.burlington.org/community_development/stormwater_management.php and
Residential Tips for Clean Water on the Town Website: http://www.burlington.org/community_development/stormwater_residential.php

Description:

Post Scoop the Poop posters, about the risk of contaminants in dog waste, in public offices and at entrances to designated public parks and playgrounds, including the Dog Park. Include the poster in Stormwater Displays e.g. at Library.

Distribute an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting Town of Burlington, General Bylaws, Article XIII 13-16 Section 2.7 referring to enforcement.

Targeted Audience: Residents

Responsible Department/Parties: Conservation, Recreation

Measurable Goal(s):

Reduce number of dog waste bags dumped in catchbasins.

Message Date(s): Library display April 2018; social media posts about scooping dog poop on May 24, 2019.

BMP:Dog Owner Education**BMP Number (Optional) 1-J**

Document Name and/or Web Address: Residential Tips for Clean Water on the Town Website: http://www.burlington.org/community_development/stormwater_residential.php

Description:

Disseminate educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time.

Targeted Audience: Residents

Responsible Department/Parties: Conservation, Town Clerk

Measurable Goal(s):

Reach all licensed dog owners.

Message Date(s):

BMP:Phosphorus runoff reduction - grass

BMP Number (Optional) 1-K

Document Name and/or Web Address: Residential Tips for Clean Water on the Town Website: http://www.burlington.org/community_development/stormwater_residential.php

Water Pollution & Stormwater page on Town website: http://www.burlington.org/community_development/stormwater_management.php

Description:

Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizer.
Organize public lecture about fertilizer use and reduction.

Targeted Audience: Residents

Responsible Department/Parties: DPW, Conservation

Measurable Goal(s):

Public presentation in first year of permit.
Use social media to distribute message and link to website page linking landscaping, phosphorus and stormwater.

Message Date(s): Fertilizer Presentation held on September 26, 2018

BMP:Phosphorus runoff reduction - leaves

BMP Number (Optional) 1-L

Document Name and/or Web Address: Residential Tips for Clean Water on the Town Website: http://www.burlington.org/community_development/stormwater_residential.php

Water Pollution & Stormwater page, Town Website: http://www.burlington.org/community_development/stormwater_management.php

Description:

Distribute an annual message before the Fall that encourages proper disposal of leaves (Clean Water Tip #5: Bag or Compost Your Leaves).

Targeted Audience: Residents

Responsible Department/Parties: DPW, Conservation

Measurable Goal(s):

Use social media to distribute message and link to website page linking landscaping, phosphorus and

stormwater. Also annual mailing in June.

Message Date(s):

Add BMP

MCM 2

Public Involvement and Participation

Permit Part 2.3.3

Objective: The permittee shall provide opportunities to engage the public to participate in the review and implementation of the permittee's SWMP.

BMP: Public Review of Stormwater Management Program

BMP Number (Optional) 2-A _____

Location of Plan and/or Web Address: http://www.burlington.org/community_development/town_stormwater_management_program.php

Responsible Department/Parties: Conservation

Measurable Goal(s):

Stormwater Management Plan is publicly available online and as hard copies in Conservation Department. Also post NOI and all Annual Reports on website.

BMP: Public Participation in Stormwater Management Program Development

BMP Number (Optional) 2-B _____

Description:

Post SWMP on website and solicit public comments. Incorporate comments as appropriate.

Responsible Department/Parties: Conservation, DPW/engineering

Measurable Goal(s):

Annual public input sought.

BMP: Violations reporting

BMP Number (Optional) 2-C _____

Document Name and/or Web Address: Report Form on Town website: http://www.burlington.org/town_government/town_clerk/request_for_information.php

Description:

Hotline/website - reporting problems/violations

Responsible Department/Parties: DPW, Health, Town Clerk

Measurable Goal(s):

Add Report Illegal Dumping to Storm Drains form and contact information to website. Linked Stormwater page to Burlington Reporting Form on March 14, 2019.

BMP: Household Hazardous Waste Days

BMP Number (Optional) 2-D

Document Name and/or Web Address: Household Hazardous Waste Collection Day info on Town website:
http://www.burlington.org/departments/board_of_health/hhw.php

Description:

Continue to hold annual or biannual Household Hazardous Waste Days for residents. Distribute information regarding storm drains and water quality to attendees.

Responsible Department/Parties: Board of Health

Measurable Goal(s):

Count number of brochures distributed or residents served at event.

BMP: Interactive stormwater education

BMP Number (Optional) 2-E

Document Name and/or Web Address:

Description:

Provide interactive stormwater education, especially targeting children.

Responsible Department/Parties: Conservation, Recreation

Measurable Goal(s):

Host table at Town event (Health fair) with activities for children (e.g. EnviroScape with Northern Middlesex Stormwater Collaborative) at least once during permit term.
Had interactive education using EnviroScape in partnership with Northern Middlesex Stormwater Collaborative in 2018.

BMP: Rain barrel program

BMP Number (Optional) 2-F

Document Name and/or Web Address:

Description:

Rain barrel program.

Responsible Department/Parties: Conservation

Measurable Goal(s):

Promote and offer rain barrels to residents at a discounted rate at least once during permit term.
Rain barrels available 2019.

BMP: Work with schools

BMP Number (Optional) 2-G

Document Name and/or Web Address:

Description:

Work with schools.

Responsible Department/Parties: Conservation/Schools

Measurable Goal(s):

Develop and implement projects with Schools, such as storm drain stenciling with High School Environmental Club, and water quality/pollution curriculum (e.g., Project Wet) into other grades and/or with Burlington Science Center.

Add BMP

MCM 3

Illicit Discharge Detection and Elimination (IDDE) Program

Permit Part 2.3.4

Objective: The permittee shall implement an IDDE program to systematically find and eliminate illicit sources of non-stormwater discharges to its municipal separate storm sewer system and implement procedures to prevent such discharges.

Examples and Templates:

[IDDE Program Template and SOPs](#)

Other templates relevant to IDDE can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#idde>

BMP: IDDE Legal Authority

BMP Number (Optional) 3-A

Completed (by May 1, 2008) ☒

Ordinances Link or Reference: <http://www.burlington.org/Illicit%20Discharges%20&%20Detection%20Bylaw.pdf>

Department Responsible for Enforcement: Board of Health & its agents

BMP: Sanitary Sewer Overflow (SSO) Inventory

BMP Number (Optional) 3-B

Completed (by year 1) ☒

Document Name and/or Web Address: See IDDE Plan under Burlington Stormwater Management Program page: http://www.burlington.org/community_development/town_stormwater_management_program.php

Description:

Develop SSO inventory in accordance with permit conditions.

Responsible Department/Parties: DPW/Water & Sewer

Measurable Goal(s):

Annually track and report the following SSO information: the location; a clear statement of whether the discharge entered a surface water directly or entered the MS4; date(s) and time(s) of each known SSO occurrence; estimated volume(s) of the occurrence; description of the occurrence indicating known or suspected cause(s); mitigation and corrective measures completed with dates implemented; and mitigation and corrective measures planned with implementation schedules. Update inventory as needed.

SSO Reporting:

In the event of an overflow or bypass, a notification must be reported within 24 hours by phone to MassDEP, EPA, and other relevant parties. Follow up the verbal notification with a written report following MassDEP's Sanitary Sewer Overflow (SSO)/Bypass notification form within 5 calendar days of the time you become aware of the overflow, bypass, or backup.

The MassDEP contacts are: Northeast Region (978) 694-3215 205B Lowell Street Wilmington, MA 01887 Central Region (508) 792-7650 8 New Bond Street Worcester, MA 01606 Southeast Region (508) 946-2750 20 Riverside Drive Lakeville, MA 02347 Western Region (413) 784-1100 436 Dwight Street Springfield, MA 01103 24-hour Emergency Line 1-888-304-1133	The EPA contacts are: EPA New England (617) 918-1510 5 Post Office Square Boston, MA 02109
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BMP: Map of Storm Sewer System

BMP Number (Optional) 3-C

Phase I Completed ☐
(by year 2)

Phase II Completed ☐
(by year 10)

Document Location and/or Web Address: http://www.burlington.org/TFH-NPDES_DrainMap2-Proj.pdf

Description:

Create map and update during IDDE program completion in accordance with permit requirements and recommendations.

Responsible Department/Parties: [DPW/Engineering](#)

Measurable Goal(s):

Map 100% of outfalls and receiving waters, open channel conveyances, interconnections with other MS4s and other storm sewer systems, municipally-owned stormwater treatment structures, waterbodies identified by name and indication of all use impairments, and initial catchment delineations within 2 years of the permit's effective date. Map 100% of outfall spatial locations, pipes, manholes, catch basins, refined catchment delineations, municipal sanitary sewer system (if available), and municipal combined sewer system (if applicable) within 10 years of the permit's effective date.

BMP: IDDE Program

BMP Number (Optional) 3-D

Written Document Completed (by year 1) ☒

Document Name and/or Web Address: [IDDE Plan under Burlington Stormwater Management Program page: http://www.burlington.org/community_development/town_stormwater_management_program.php](http://www.burlington.org/community_development/town_stormwater_management_program.php)

Description:

Create written IDDE program.

Responsible Department/Parties: DPW/Engineering & Conservation

Measurable Goal(s):

Conduct 100% of outfall screening on High and Low Priority Outfalls within 3 years of the permit's effective date. Complete catchment investigations for 100% of the Problem Outfalls within 7 years of the permit's effective date. Complete 100% of all catchment investigations within 10 years of the permit's effective date.

The outfall/interconnection inventory and initial ranking and the dry weather outfall and interconnection screening and sampling results can be found:

Outfall/interconnection inventory and initial ranking in IDDE Plan under Burlington Stormwater Management Program page: http://www.burlington.org/community_development/town_stormwater_management_program.php

BMP: Employee Training

BMP Number (Optional) 3-E

Description:

Train employees on IDDE implementation. Identify staff to be trained, evaluate whether to use consultant or Town staff to conduct trainings, and implement training program. Report in annual reports.

Responsible Department/Parties: DPW/Admin, Health

Measurable Goal(s):

Training occurs annually.

BMP:Outfall Ranking

BMP Number (Optional) 3-F

Completed ☒

Document Name and/or Web Address:

Description:

Assess and priority rank outfalls/interconnections. Rank outfalls based on potential for illicit discharges, SSOs and public health significance. In accordance with part A.III of Appendix F, catchments draining to waterbodies impaired for bacteria/pathogens shall be ranked Problem or High priority.

Responsible Department/Parties: DPW/Engineering & Conservation

Measurable Goal(s):

Complete initial inventory & priority ranking within 1 year of effective date of permit (by 7/1/19), update annually and include in Annual Report, and complete final ranking within 3 years of effective date of permit (by 7/1/21).

BMP:Stormwater Intern Porgram

BMP Number (Optional) 3-G

Completed ☐

Document Name and/or Web Address:

Description:

Create Stormwater Intern Program, working with local college(s)/universities. Use intern assistance for completing mapping, conducting screening and sampling, and other tasks.

Responsible Department/Parties:

Measurable Goal(s):

Establish program, hire interns, continue in future years as needed.

Add BMP

MCM 4

Construction Site Stormwater Runoff Control

Permit Part 2.3.5

Objective: The objective of an effective construction stormwater runoff control program is to minimize or eliminate erosion and maintain sediment on site so that it is not transported in stormwater and allowed to discharge to a water of the U.S. through the permittee's MS4.

Examples and Templates:

Examples and templates relevant to MCM 4, including model ordinances and site inspection templates, can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#csrc>

BMP: Sediment and Erosion Control Ordinance

BMP Number (Optional) 4-A

Completed (by May 1, 2008) ☒

Ordinances Link or Reference: Erosion & Sedimentation Control Bylaw http://www.burlington.org/community_development/docs/Stormwater_Bylaw.pdf

Department Responsible for Enforcement: Conservation Commission, its employees or agents, and the Planning Board, its employees or agents

BMP: Site Plan Review Procedures

BMP Number (Optional) 4-B

Written procedures completed (by year 1) ☒

Document Name and/or Web Address: Erosion & Sedimentation Control Bylaw http://www.burlington.org/community_development/docs/Stormwater_Bylaw.pdf

Description:

Complete written procedures of site plan review and begin implementation. Evaluate whether to update Site Plan Rules & Regulations.

Responsible Department/Parties: Planning, Conservation

Measurable Goal(s):

Conduct site plan review of 100% of projects according to the procedures outlined above.

BMP: Site Inspections and Enforcement of Sediment and Erosion Control Measures Procedures

BMP Number (Optional) 4-C

Completed (by year 1) ☒

Document Name and/or Web Address: Erosion & Sedimentation Control Bylaw http://www.burlington.org/community_development/docs/Stormwater_Bylaw.pdf

Construction Site Inspection and Sediment and Erosion Control SOPs and forms are here: http://www.burlington.org/community_development/town_stormwater_management_program.php

Description:

Complete written procedures of site inspections and enforcement procedures and begin implementation. Maintain consistency with existing Stormwater Management bylaw or as amended.

Responsible Department/Parties: Conservation, Planning

Measurable Goal(s):

Inspect 100% of construction sites as outlined in the above document and take enforcement actions as needed.

BMP: Permit tracking procedure**BMP Number (Optional)** 4-D**Completed** ☐

Document Name and/or Web Address: Permitting_Database (for Orders of Conditions, Determinations and erosion control projects administered by Conservation)
ViewPoint used by several departments for permitting

Description:

Develop procedure for tracking number of site reviews, inspections and enforcement actions, related to site plan review. Coordinate and streamline existing activities between permitting departments.

Responsible Department/Parties: Conservation, Planning, DPW/Engineering, Health, Building, Fire

Measurable Goal(s):

Record and report numbers in Annual Reports. Track 100% of projects.

BMP: Construction sediment and erosion control**BMP Number (Optional)** 4-E**Completed** ☐

Document Name and/or Web Address: Erosion & Sedimentation Control Bylaw http://www.burlington.org/community_development/docs/Stormwater_Bylaw.pdf

Description:

Erosion and Sediment Control: Evaluate whether to update Stormwater Management bylaw and requirements for construction operators to implement a sediment and erosion control program, including references and/or design standards.

Responsible Department/Parties: Conservation, Planning

Measurable Goal(s):

If update is required, complete within 2 years of the effective date of permit.

BMP: Construction waste control

BMP Number (Optional) 4-F

Completed ☐

Document Name and/or Web Address:

Description:

Waste Control: Evaluate whether to update Stormwater Management bylaw and requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes.

Responsible Department/Parties:

Measurable Goal(s):

If update is required, complete within 2 years of the effective date of permit.

BMP: Department Coordination Meetings

BMP Number (Optional) 4-G

Completed ☐

Document Name and/or Web Address:

Description:

Pre-Construction/Coordination Meetings: Continue to hold bimonthly or as-needed interdepartmental Development Coordination Meetings to discuss upcoming development projects and permitting, including applicants when appropriate.

Responsible Department/Parties:

Measurable Goal(s):

Record number of meetings held and/or number of projects discussed. Planning Board coordinates ongoing meetings.

MCM 5

Post Construction Stormwater Management in New Development and Redevelopment

Permit Part 2.3.6

Objective: The objective of an effective post construction stormwater management program is to reduce the discharge of pollutants found in stormwater to the MS4 through the retention or treatment of stormwater after construction on new or redeveloped sites and to ensure proper maintenance of installed stormwater controls.

Examples and Templates:

Examples and templates relevant to MCM 5, including model ordinances and bylaw review templates and guidance can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#pcsm>

BMP: Post-Construction Ordinance

BMP Number (Optional) 5-A

Completed (by year 2) ☒

Town Ordinances Link or Reference:

Department Responsible for Enforcement:

BMP: Street Design and Parking Lot Guidelines Report

BMP Number (Optional) 5-B

Completed (by year 4) ☐

Document Name and/or Web Address:

Description:

Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options. Evaluate Zoning Bylaw, Site Plan and Subdivision Rules & Regulations, Street Opening/Utility Connection Rules & Regulations, and other relevant bylaws/regulations.

Responsible Department/Parties:

Measurable Goal(s):

Recommendations are implemented by 7/1/2025 with progress reported annually.

BMP: Green Infrastructure Report

BMP Number (Optional) 5-C

Completed (by year 4) ☐

Document Name and/or Web Address:

Description:

Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist. Evaluate Zoning Bylaw, Site Plan and Subdivision Rules and Regulations and other relevant bylaws/regulations.

Responsible Department/Parties:

Measurable Goal(s):

Recommendations are implemented by 7/1/2025 with progress reported annually.

BMP: List of Municipal Retrofit Opportunities

BMP Number (Optional) 5-D

Completed (by year 4) ☐

Document Name and/or Web Address:

Description:

Identify/inventory at least 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas, including BMPs that infiltrate stormwater in accordance with part II of Appendix H, and update annually. In addition, identify all properties with retrofit opportunities for structural BMPs (for phosphorus removal) also in accordance with part II of Appendix H.

Responsible Department/Parties: DPW/Engineering, Fire, Recreation, Schools

Measurable Goal(s):

The list is completed by 7/1/2022 and updated as needed. Report annually on retrofitted properties. Identify additional properties in the fifth year Annual Report (2022-2023) to maintain a minimum of 5 sites in the potential retrofit inventory. In addition, complete inventory of all properties within 5 years of effective date of permit (7/1/23).

BMP:Stormwater Bylaw amendment to meet retention or treatment requirements

BMP Number (Optional) 5-E

Completed ☐

Document Name and/or Web Address:

Description:

Amend/modify existing Stormwater Management Bylaw to meet permit requirements, including optimizing stormwater management BMPs for phosphorus removal in accordance with part II of Appendix H.

Responsible Department/Parties: Conservation, Planning, Engineering

Measurable Goal(s):

Modify by 7/1/20.

BMP:As-built plans for on-site stormwater control

BMP Number (Optional) 5-F

Completed ☐

Document Name and/or Web Address:

Description:

Amend/modify existing Stormwater Management Bylaw and/or procedures to require as-built drawings within

2 years of project completion and procedures to ensure long term operation and maintenance.

Responsible Department/Parties: Conservation, Planning

Measurable Goal(s):
Modify or establish procedures by 7/1/20.

BMP:Erosion and Sedimentation Control Bylaw

BMP Number (Optional) 5-G **Completed** ☐

Document Name and/or Web Address: Erosion & Sedimentation Control Bylaw http://www.burlington.org/community_development/docs/Stormwater_Bylaw.pdf

Description:
Continue to administer the Stormwater Management Bylaw Governing Erosion and Sedimentation Control for New and Redevelopment Projects During Construction and Post-Construction Periods Bylaw.

Responsible Department/Parties:

Measurable Goal(s):
Track permits issued and any enforcement activity. Report annually.

Add BMP

MCM 6

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Permit Part 2.3.7

Objective: The permittee shall implement an operations and maintenance program for permittee-owned operations that has a goal of preventing or reducing pollutant runoff and protecting water quality from all permittee-owned operations.

Examples and Templates:

Examples and templates relevant to MCM 6, including SOP templates for catch basin cleaning, street sweeping, vehicle maintenance, parks and open space management, winter deicing, and Stormwater Pollution Prevention Plans can be found here: <https://www.epa.gov/npdes-permits/stormwater-tools-new-england#gh>

PERMITTEE OWNED FACILITIES

BMP: Parks and Open Spaces Operations and Maintenance Procedures

BMP Number (Optional) 6-A

Written Document Completed (by year 2) ☐

Document Name and/or Web Address:

Description:

Create written O&M procedures (SOP) including all requirements contained in 2.3.7.a.ii for parks and open spaces, including lawn maintenance, management of pet and wild animal waste and trash. The procedures shall include additional requirements in part II of Appendix H.

Responsible Department/Parties:

Recreation, Schools

Measurable Goal(s):

Implement the SOP listed above on 100% of the parks and open spaces (by 7/1/2020).

Properties List (Optional):

See Open Space & Recreation Plan 2019

BMP: Buildings and Facilities Operations and Maintenance Procedures

BMP Number (Optional) 6-B

Written Document Completed (by year 2) ☐

Document Name and/or Web Address:

Description:

Create written O&M procedures (SOP) including all requirements contained in 2.3.7.a.ii for buildings and facilities, including management of petroleum products, other pollutants and waste. The procedures shall also include additional requirements in part II of Appendix H.

Responsible Department/Parties:

DPW, Fire, Recreation, Schools, Health

Measurable Goal(s):

Implement the SOP listed above on 100% of buildings and facilities (by 7/1/2020).

Properties List (Optional):

BMP: Vehicles and Equipment Operations and Maintenance Procedures

BMP Number (Optional) 6-C

Written Document Completed (by year 2) ☐

Document Name and/or Web Address:

Description:

Create written O&M procedures (SOP) including all requirements contained in 2.3.7.a.ii for vehicles and equipment, including fueling, washing and containment of leaks. The procedures shall also include additional requirements in part II of Appendix H.

Responsible Department/Parties: DPW, Fire, Recreation, Schools, Health

Measurable Goal(s):

Implement the SOP listed above for 100% of vehicles and equipment according to the above document (by 7/1/2020).

Properties List (Optional):

INFRASTRUCTURE

BMP: Infrastructure Operations and Maintenance Procedures

BMP Number (Optional) 6-D

Written Procedure Completed (by year 2) ☐

Document Name and/or Web Address:

Description:

Establish and implement program for repair and rehabilitation of MS4 infrastructure.

Responsible Department/Parties: DPW/Engineering

Measurable Goal(s):

100% of infrastructure is maintained to ensure proper function in accordance with the procedures above.

BMP: Catch Basin Cleaning Program

BMP Number (Optional) 6-E

Written Procedure Completed (by year 1) ☒

Document Name and/or Web Address:

Catch Basin Cleaning Program: http://www.burlington.org/community_development/town_stormwater_management_program.php

Description:

Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule. Report number of catch basins cleaned and volume of material moved annually.

Responsible Department/Parties: DPW/Engineering

Measurable Goal(s):

All catch basins are cleaned in accordance to the document above such that no catch basin is more than 50% full at any given time.

BMP: Street Sweeping Program

BMP Number (Optional) 6-F

Written Procedure Completed (by year 1) ☒

Document Name and/or Web Address:

SOP Sweeping Streets and Parking Lots: http://www.burlington.org/community_development/town_stormwater_management_program.php

Description:

Sweep all streets and permittee-owned parking lots twice per year in the spring & in the fall.

Responsible Department/Parties: DPW

Measurable Goal(s):

Annually sweep 100% of all streets and 50% of all municipal parking lots in accordance with the schedule listed above.

BMP: Winter Road Maintenance Program

BMP Number (Optional) 6-G

Written Procedure Completed (by year 1) ☒

Document Name and/or Web Address:

Snow Removal and De-icing: http://www.burlington.org/community_development/town_stormwater_management_program.php

Description:

Implement salt use optimization during deicing season.

Responsible Department/Parties: DPW

Measurable Goal(s):

Evaluate at least one salt/chloride alternative for use in the municipality.

BMP: Stormwater Treatment Structures Inspection and Maintenance Procedures

BMP Number (Optional) 6-H

Completed (by year 1) ☐

Document Name and/or Web Address:

Description:

Establish and implement inspection and maintenance procedures and frequencies.

Responsible Department/Parties: DPW

Measurable Goal(s):

Inspect and maintain 100% of treatment structures to ensure proper function.

BMP: SWPPP

BMP Number (Optional) 6-I

Completed (by year 2) ☐

Document Name and/or Web Address:

Description:

Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities by 7/1/2020.

Responsible Department/Parties: DPW, Fire, Recreation, Schools, Health

Measurable Goal(s):

Develop and implement SWPPPs for 100% of facilities.

BMP: Staff Training

BMP Number (Optional) 6-J

Completed ☐

Document Name and/or Web Address:

Appendix E, IDDE Plan: [http://www.burlington.org/
community_development/town_stormwater_management_program.
php](http://www.burlington.org/community_development/town_stormwater_management_program.php)

Description:

Identify staff to be trained as identified in SWPPPs. Evaluate whether to use consultant or Town staff to conduct trainings, and implement training program.

Responsible Department/Parties: DPW, Fire, Recreation, Schools, Health

Measurable Goal(s):

Conduct employee trainings annually.

BMP: SWPPP inspections**BMP Number (Optional)** 6-K**Completed** ☐**Document Name and/or Web Address:****Description:**

Evaluate whether to use consultant or Town staff to conduct inspections as required in the SWPPPs, and implement inspection program.

Responsible Department/Parties: DPW, Fire, Recreation, Schools, Health**Measurable Goal(s):**

Conduct inspections quarterly, with at least one inspection conducted when a stormwater discharge is occurring.

BMP: Control of Toxic and Hazardous Material Bylaw**BMP Number (Optional)** 6-L**Completed** ☒**Document Name and/or Web Address:**

Bylaw: http://www.burlington.org/departments/board_of_health/docs/Control_of_Toxic_and_Hazardous_Material_Bylaw_prn.pdf

Description:

Continue to administer the Control of Toxic and Hazardous Material Bylaw for commercial and industrial establishments as well as relevant Town facilities.

Responsible Department/Parties: Health**Measurable Goal(s):**

Ensure compliance with bylaw. Track registrations and any enforcement activity.

BMP: Composting Program

BMP Number (Optional) 6-M _____

Completed ☐

Document Name and/or Web Address:

Description:

Continue to offer compost bins to residents at a reduced rate & promote program.

Responsible Department/Parties: DPW

Measurable Goal(s):

Record number of bins purchased.

BMP: Household Hazardous Waste Collection

BMP Number (Optional) 6-N _____

Completed ☐

Document Name and/or Web Address:

Household hazardous waste collection day: http://www.burlington.org/departments/board_of_health/hhw.php

Description:

Continue to offer household hazardous waste (HHW) collection days for residents twice a year.

Responsible Department/Parties: Health

Measurable Goal(s):

Record HHW days held and quantity of material collected/number of residents served if feasible.

BMP: Medical Waste Collection

BMP Number (Optional) 6-O _____

Completed ☐

Document Name and/or Web Address:

Medical Sharps Disposal: http://www.burlington.org/departments/board_of_health/medical_sharps_disposal.php

Description:

Continue to offer drop off disposal of sharps and unused & unwanted medications for residents.

Responsible Department/Parties: Fire, Police

Measurable Goal(s):

Maintain Sharps Kiosk for "home" sharps at Fire Station. Maintain drop off for prescription & over-the-counter medicines at Police Station.

BMP: Recycling Program & Yard Waste Collection

BMP Number (Optional) 6-P

Completed ☐

Document Name and/or Web Address: Trash and recycling collection schedule: http://www.burlington.org/new_departments/trash_and_recycle.php

Description:

Continue to offer curbside recycling & seasonal yard waste collection to residents.

Responsible Department/Parties: DPW

Measurable Goal(s):

Promote recycling & yard waste collection with annual mailer to residents & implement programs.

Add BMP

Annual Evaluation

Year 1 Annual Report

Document Name and/or Web Address:

Year 2 Annual Report

Document Name and/or Web Address:

Year 3 Annual Report

Document Name and/or Web Address:

Year 4 Annual Report

Document Name and/or Web Address:

Year 5 Annual Report

Document Name and/or Web Address:

Year X Annual Report

Document Name and/or Web Address:

Add a Year

TMDLs and Water Quality Limited Waters

Select the applicable Impairment(s) and/or TMDL(s).

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 and Pathogen ☐ Metals ☐ Nitrogen ☐ Phosphorus

Clear Impairments and TMDLs

Bacteria/Pathogens

Combination of Impaired Waters Requirements and TMDL Requirements as Applicable

Applicable Receiving Waterbody(ies)	TMDL Name (if applicable)	Add/Delete Row
Shawsheen River		+ -

Annual Requirements Beginning Year 1

Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 3-F Outfall Ranking

Public Education and Outreach

(Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information))

Annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 1-I Dog Waste Reduction

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

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 1-J Dog Owner Education

Provide information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

Very few septic systems remain in Burlington.

Phosphorus

Combination of Impaired Waters Requirements and TMDL Requirements as Applicable

Applicable Receiving Waterbody(ies)	TMDL Name (if applicable)	Add/Delete Row
All waterbody segments townwide		+ -

Annual Requirements Beginning Year 1

Rank outfalls to these receiving waters as high priority for IDDE implementation in the initial outfall ranking

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 3-F Outfall Ranking

Public Education and Outreach

(Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information))

Distribute an annual message in the spring (April/May) that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release and phosphorus-free fertilizers

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 1-K: Phosphorus runoff reduction
BMP 6-P: Recycling Program & Yard Waste Collection

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

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 1-I: Dog Waste Reduction and BMP 1-J Pet Owner Education

Distribute an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 1-L: Phosphorus runoff reduction - leaves

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

Increase street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 6-F Street Sweeping Program

Establish procedures to properly manage grass cuttings and leaf litter on permittee property, including prohibiting blowing organic waste materials onto adjacent impervious surfaces

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 6-B Buildings & Facilities Operations and Maintenance Procedures

Stormwater Management in New Development and Redevelopment

Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs to reduce phosphorus discharges

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 5-D List of Municipal Retrofit Opportunities

BMP 5-E Stormwater Bylaw amendment to meet retention or treatment requirements

Phosphorus Reduction Tracking BMP

Any structural BMPs listed in Table 3 of Attachment 1 to Appendix H already existing or installed in the regulated area by the permittee or its agents shall be tracked and the permittee shall estimate the phosphorus removal by the BMP consistent with Attachment 1 to Appendix H.

The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in pass per year by the BMP is found in the following document or website and is updated yearly at a minimum:

Phosphorus Source Identification Report; Annual Report.

Requirements Due by Year 2

Stormwater Management in New Development and Redevelopment

The requirement for adoption/amendment of the permittee's ordinance or other regulatory mechanism shall include a requirement that new development and redevelopment stormwater management BMPs be optimized for phosphorus removal

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

Updated Stormwater Bylaw, if deemed necessary.

Requirements Due by Year 4

Complete a Phosphorus Source Identification Report

The document name (if attached) and/or web address is/are:

Stormwater Management in New Development and Redevelopment

Retrofit inventory and priority ranking under 2.3.6.1.b. shall include consideration of BMPs that infiltrate stormwater where feasible

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 5-D List of Municipal Retrofit Opportunities

Requirements Due by Year 5

Potential Structural BMPs

Evaluate all permittee-owned properties identified as presenting retrofit opportunities or areas for structural BMP installation under Permit part 2.3.6.d.ii or identified in the Phosphorus Source Identification Report that are within the drainage area of the impaired water or its tributaries

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are:

BMP 5-D List of Municipal Retrofit Opportunities

Complete a listing of planned structural BMPs and a plan and schedule for implementation

The relevant BMP number(s) listed above in the Stormwater Management Program OR the description of implementation actions and document location(s) are: