

**Municipality/Organization:** Littleton, MA

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**EPA NPDES Permit Number:** MA041204

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**MaDEP Transmittal Number:** W-035458

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**Annual Report Number**  
**& Reporting Period:** Year 13: April 1, 2015 – March 31, 2016

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## **NPDES PII Small MS4 General Permit Annual Report**

### **Part I. General Information**

**Contact Person:** Keith A. Bergman      **Title:** Town Administrator

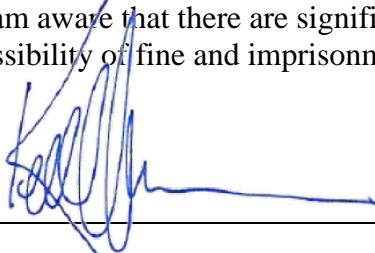
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#### Certification:

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, 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.

**Signature:** 

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**Printed Name:** Keith A. Bergman

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**Title:** Town Administrator

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**Date:** April 28, 2016

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## **Part II. Self-Assessment**

The Town of Littleton has completed the required self-assessment, and as of the end of Permit Year 13, the Town is generally in compliance with the conditions of the permit. See Part III for status of BMPs.

As part of the Annual Report development, the Town also evaluated the appropriateness of all BMPs in efforts towards achieving the defined measurable goals. This year, the majority of BMPs and measureable goals continue to be appropriate with a few exceptions. Several Public Education and Public Participation BMPs from the 2003 Stormwater Management Plan are no longer appropriate with current staff resources, school curriculum constraints, budget limitations, and changes to SuAsCo's stormwater outreach materials. However, we believe that the intent of all of these BMPs is being met through other program elements. Please refer to BMPs 1H, 2B, 2C, and 2E for a more detailed explanation. The Town plans to reevaluate all BMPs when preparing the Notice of Intent and Stormwater Management Plan for compliance with the final 2016 General Permit requirements and will make substitutions with more suitable BMPs at that time.

## Part III. Summary of Minimum Control Measures

### 1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities - Permit Year 14 (if applicable)
<b>1A</b>	Stormwater Flyer for Residents	Water Dept	Flyer distributed to a minimum of 75% of residents	<b>BMP Completed Year 1.</b> The Town of Littleton has been using materials provided by the SuAsCo Watershed Community Council to assist in compliance with public education and outreach. During Permit Year 13, the Town did not receive or distribute any new materials from SuAsCo.  The Town developed a brochure to support the two stormwater bylaws proposed for adoption at the May 2, 2016 Annual Town Meeting. Refer to BMP 1F for more information.	<b>BMP Completed Year 1.</b>  The Littleton Electric Light and Water Department (LELWD) mailed the brochure entitled, “Two New Stormwater Bylaws” to all Littleton residents as a bill stuffer in April 2016.
Revised					
<b>1B</b>	Stormwater Lesson Plan for Fifth Graders	Water Dept	Develop/distribute lesson plan for grade 5 level. Lesson plan taught in one or more classrooms.	In Year 13, the LELWD continued to sponsor a field trip to their facility for fourth graders from the Littleton school district on June 10. Presentations made to students continued to include a discussion on stormwater management.	The Town plans to continue to hold educational workshops that include stormwater topics with local area students.
Revised					
<b>1C</b>	Stormwater Flyer for Community Businesses	Water Dept	Develop flyer and distribute to 50% of businesses	In Year 13, the <i>Watts &amp; Drops</i> newsletter produced by LELWD was distributed to local business owners and residents in the summer and winter. The summer newsletter discussed updates to the Town’s summer outdoor watering policy in order to comply with revisions to the state Water Management Act. Under these revised state regulations, the Littleton Water Dept. has determined that residents must restrict outdoor water use between the hours of 9AM and 5PM whenever streamflow of the Merrimack River drops below 4,311 cubic feet per day in May and 1,066 cubic feet throughout the summer months and encouraged residents to increase water conservation by encouraging various outdoor watering tips.	LELWD will continue to distribute the <i>Watts &amp; Drops</i> Newsletter to local business owners including information on water conservation/proper hazardous materials disposal/stormwater management.
Revised					

<b>1D</b>	Stormwater Media Campaign	Water Dept	Media Info Package delivered to Media	<p><b>BMP Completed Year 4.</b> In previous permit years, the Town obtained a PowerPoint and Media Toolkit from SuAsCo for media distribution. During Year 13, the Town continued to meet the intent of this completed BMP by make stormwater management information available on the Town's website and in the <i>Watts &amp; Drops</i> newsletter. Information is currently posted on the Town's rain barrel program, the sale of drought tolerant grass seed and the Town's water conservation program.</p> <p>Two Board of Selectmen (BoS) meetings where Littleton's stormwater program was the primary topic were aired live on Littleton Community Television (LCTV) and available for viewing on demand. On September 21, 2015, Frederick Civian, MassDEP Stormwater Coordinator, attended the Board of Selectmen meeting to discuss upcoming changes to the State's MS4 program requirements and how these changes will impact the Town. Water Commissioners and members of the Board of Health, Planning Board, Conservation Commission, and Clean Lakes Committee, Finance Committee were also in attendance.</p> <p>Another BoS meeting was held on February 29, 2016 to provide updates on the Town's MS4 Program including a presentation that summarized a third-party review of the Town's current stormwater program highlighting achievements and needs, an overview of two proposed stormwater bylaws, and the Town's funding plan for the new permit requirements.</p>	<b>BMP Completed Year 4.</b>
<b>1E</b>	Stormwater Video	Water Dept	Show stormwater video at a minimum of one public meeting; Air stormwater video at least once on local cable station	<p>During Year 12, Littleton became part of the Northern Middlesex Stormwater Collaborative. The Collaborative provided Littleton with a public service announcement on stormwater that Littleton intends to air on their local cable access channel as well as include on the Town's website <a href="http://www.lewd.com/water-department/source-water-protection/">http://www.lewd.com/water-department/source-water-protection/</a>.</p> <p>See BMP 1D for Board of Selectmen meetings aired on LCTV.</p>	The Town plans to air the public service announcement on stormwater provided by the Northern Middlesex Stormwater Collaborative on LCTV and include it on the Town's website.
Revised					

<b>1F</b>	Littleton-Specific Stormwater Flyers	Water Dept	Distribute Littleton-specific along with SuAsCo brochures	In Year 13, the Town, through its Clean Lakes Committee, continued to provide educational materials to watershed groups through handouts distributed at meetings. The <i>Watts &amp; Drops</i> newsletter produced by the Littleton Electric Light and Water Dept. was also distributed to local business owners and residents in the summer and winter. Refer to BMP 1C for this year's topics. The Town developed a brochure to support the two stormwater bylaws proposed for adoption at the May 2, 2016 Annual Town Meeting. This brochure is available at <a href="http://www.littletonma.org/filestorage/19479/19481/27146/35888/Littleton_StormwaterBylaws_May2016TownMeeting.pdf">http://www.littletonma.org/filestorage/19479/19481/27146/35888/Littleton_StormwaterBylaws_May2016TownMeeting.pdf</a> .	The Town will continue to supplement educational materials obtained from the Northern Middlesex Stormwater Collaborative and watershed groups with customized materials as necessary.
<b>1G</b>	Community Education: Hazardous Waste Day and Recycling advertised	Highway / Water Dept.	Continue to write At Least One Article Per Year in the Local Paper and post announcements elsewhere	Littleton continued with its mandatory recycling program during Year 13. Recycling information is posted at <a href="http://www.littletonma.org">www.littletonma.org</a> . Recyclable materials are accepted in the bins at the local transfer station. Flyers and postcards are distributed outlining the recycling program. Along with 8 other communities, Littleton is a member of the North Central Regional Solid Waste Cooperative. The Town also is a member town included in the Devens Regional Household Hazardous Waste Recycling Facility, which is open to residents and pre-qualified businesses within member communities. It allows hazardous waste to be collected up to 20 times per year at one central location. Flyers were distributed outlining disposal fees and items that can be disposed of at the facility.	Littleton will continue with its current recycling program, and will continue participation in the North Central Regional Solid Waste Cooperative and the Regional Household Hazardous Waste Collection Facility located in Devens.
<b>1H</b>	Business Education	Water Dept	Expand Commending Businesses for Environmental Practices	As stated in the Town's 2003 NOI, this recognition program for local businesses was expected to be conducted in conjunction with an existing Nashoba Valley Chamber of Commerce program. However, this program was not implemented regionally. The intent of this BMP is being met through BMP 1C.	During development of the Town's Stormwater Management Plan, identify other opportunities to educate local businesses per the 2016 General Permit requirements.
<b>1I</b>	Stormwater Flyer for Agriculture	Water Dept	Develop flyer and distribute to agricultural land owners	<b>BMP Completed Year 3.</b> In previous permit years, pamphlets produced by the Clean Lakes Committee were distributed to agricultural land owners within Town and provided information on protection of water quality through stormwater management. Agricultural land owners continue to receive stormwater and watershed stewardship information through the <i>Watts &amp; Drops</i> newsletter.	<b>BMP Completed Year 3.</b>
Revised					

<b>1J</b>	Newsletter / Newspaper Articles	Water Dept	Write at least one article in <i>Watts &amp; Drops</i> newsletter and newspaper per year	In Year 13, the <i>Watts &amp; Drops</i> newsletter was distributed to local business owners and residents in the summer and winter. See all BMP 1C.	The Town will continue to include stormwater information in the <i>Littleton Independent</i> and/or the <i>Watts &amp; Drops</i> newsletter when appropriate.
Revised				A newspaper article was published on October 22, 2015 in the <i>Littleton Independent</i> documenting the September 21, 2015 stormwater management BoS meeting with Frederick Civian of MassDEP (see BMP 1D).	In April 2016, the Town Meeting Report was distributed to all residents, including articles, motions, recommendations, explanations, Consent Calendar, and Finance Committee Report. This included 2 articles regarding stormwater bylaws (see BMPs 3A, 4A, and 5A) and an article requesting a stormwater budget appropriation. The Town Meeting Report is also available here: <a href="http://www.littletonma.org/content/19733/19783/36257/36259.aspx">http://www.littletonma.org/content/19733/19783/36257/36259.aspx</a> .
<b>1K</b>	Stormwater Info on Town Website	Water Dept	Provide storm water links by year 2; provide Littleton specific information by year 4	In Year 13, copies of the <i>Watts &amp; Drops</i> summer and winter newsletters were posted on LELWD's website, which can be accessed through the Town's website. These newsletters traditionally provide information on stormwater management, hazardous materials management and outdoor water conservation.	The Town's website and the LELWD's website will continue to be a key method for disseminating stormwater-related public education and for encouraging public participation in the Town's program.
Revised				<p>In addition, this website contains meeting minutes for the Clean Lakes Committee.</p> <p>The website also provides information regarding the Town's rain barrel program, the sale of drought tolerant grass seed and the Town's water conservation program, technical reports and studies regarding stormwater management and watershed stewardship, and other educational materials.</p>	

## 2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities - Permit Year 14 (if applicable)
<b>2A</b>	Stormwater Traveling Display	Water Dept.	Display circulates for a min of 3 months per year; Display is posted at a min of 3 locations per year	The Town of Littleton has been utilizing kiosks with stormwater information provided by the SuAsCo Watershed Community Council to assist with public involvement. During Year 13, kiosks containing information regarding stormwater management practices were on display at the Boat Launch Area/Town Beach and the Wetland Park Area of Long Lake.	The Town will continue to have kiosks with stormwater information on display for the public at selected locations throughout Town.
Revised					
<b>2B</b>	Poster Contest for Fifth Graders	Water Dept.	Poster contest is held and entries are received, judged and displayed	The Town did not hold a stormwater poster contest for fifth graders during Year 13, although poster contests were held in previous years with help from the SuAsCo Watershed Community Council. The intent of this BMP has been met through BMP 1B's annual interactive fifth grade curriculum.	The Town will evaluate whether this 2003 BMP is feasible to meet 2016 General Permit requirements during the Stormwater Management Plan process.
Revised					
<b>2C</b>	Photo Contest for High Schoolers	Water Dept.	Photo contest is held and entries are received, judged and displayed	The Town was unable to hold a stormwater photo contest with the high school students as this initiative was more difficult to implement in the high school curriculum. The intent of this BMP has been met through BMP 1H.	The Town will evaluate whether this 2003 BMP is feasible to meet 2016 General Permit requirements during the Stormwater Management Plan process.
Revised					
<b>2D</b>	Stormwater Summit Event	Water Dept	Hold Local or multi community stormwater summit year 4	<b>BMP Completed Year 4 with SuAsCo.</b> The Town is a member of the Northern Middlesex Stormwater Collaborative, which hosted a number of regional stormwater workshops and training opportunities in Permit Years 12 and 13.	<b>BMP Completed Year 4 with SuAsCo.</b> The Town will continue its participation in the Northern Middlesex Stormwater Collaborative.
Revised					
<b>2E</b>	Stormwater Super Summit Event	Water Dept.	Municipal participation in the Stormwater Super Summit	The “Stormwater Super Summit” was eliminated from SuAsCo Year 5 product. The intent of this BMP (regional sharing of stormwater program information) is being met through participation in the Northern Middlesex Stormwater Collaborative.	The Town will continue its participation in the Northern Middlesex Stormwater Collaborative.
Revised					

<b>2F</b>	Annual Public Meeting/Hearing Regarding Plan Status and Reports to EPA	Selectmen	Hold meeting in April prior to May 1 submission of report	During Year 13, public meetings were held by the Clean Lakes Committee, the Planning Board and through Town Meeting. Stormwater management initiatives and watershed restoration efforts were discussed at these meetings.	Public meetings will continue to be held by the Clean Lakes Committee, the Planning Board and through Town Meeting, and new stormwater management initiatives will be discussed.
Revised				Two BoS meetings were held in Year 13 regarding stormwater management and MS4 permit compliance. (See BMP 1D)	In April 2016 the Town distributed to all residents a Town Meeting Report providing information on the Annual Town Meeting scheduled for May 2 <sup>nd</sup> , 2016 which includes three stormwater-related articles. See BMP 1J for more information.
<b>2G</b>	Involve Watershed Groups: Clean Lakes Committee, Spectacle, Mill, Long, & Forge Ponds	Water Dept. & Local Groups	Continue meetings at least 4 times/yr; Continue annual cleanup days; Educational Information Shared by Town;	During Year 13, the Clean Lakes Committee continued to meet monthly on strategies being utilized for stormwater management and in lake restoration efforts. In addition, the Town, along with the Clean Lakes Committee, made available to residents, low-impact drought tolerant grass seed and rain barrels as part of their water conservation efforts as they have in years past. The Long Lake Neighborhood Association also continued to hold their annual spring clean-up on April 10.	The Clean Lakes Committee will attend an annual meeting with local lake management associations on stormwater management and lake restoration efforts. The Long Lake Neighborhood Association will continue to hold an annual Long Lake spring clean-up event.
Revised					
<b>2H</b>	Involve Children's groups (such as 4H, scouts)	Water Dept	Children's groups at least once per year help distribute or display educational information	In previous years, the Town had boy scouts use storm drain markers to label catch basins to educate the public and prevent illegal dumping into the storm drain system. No storm drain stenciling was performed in Year 13.	The Town will continue to seek out local youth groups to participate in the Town's stormwater program.
Revised					

### 3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities - Permit Year 14 (if applicable)
3A	REQUIRED: Illicit Discharge Bylaw / Regulatory Mechanism	Water Dept / Highway	Develop draft bylaw; involve and educate public, municipal officials, etc.	An <i>Illicit Connections and Discharges to Storm Drain System Bylaw</i> is proposed for adoption at the May 2, 2016 Annual Town Meeting. This bylaw will give the Town a tool to eliminate and prevent pollution from entering the Town's storm drain system. Bylaw changes made in previous permit years include the development of a Board of Health regulation regarding floor drain discharges in commercial and industrial facilities to preserve and protect the Town's surface and groundwater resources.	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised		Water Dept has assumed lead role.			
3B	REQUIRED: Storm Drain Map	Highway	Compile existing record plans and surveyed data. Find and locate drainage outfalls in the field.	During Year 13, the Town did not complete any additional mapping of the storm drain system. In past permit years, 100% of available plans were compiled onto a town-wide drainage system map so substantially all outfalls have been identified. Approx. 50% of structures have been located by GPS.	The Town will continue to map additional outfalls in urbanized areas as needed as a result of new construction.
Revised					
3C	REQUIRED: Illicit Discharge Detection and Elimination Plan	Highway	Determine Priority Areas and Discuss Plan Visually Screen Outfalls During Dry Weather (at least 20% each year)	During Year 13, the Highway Department continued to visually screen drainage structures, including outfalls, for illicit discharges, on a limited basis during annual cleaning. Illicit discharges are reported to the Board of Health, and the Water & Highway Departments follow-up to investigate the source of these discharges. In the past illegal connections from wash water and contaminated sump pump discharges have been found and disconnected.	The Town will continue to implement their IDDE Plan, and visually inspect drainage structures for illicit discharges during routine cleaning & maintenance.
Revised					

<b>3D</b>	REQUIRED: Illicit Discharge Education for General Public & Businesses	Water Dept.	Include illicit discharge education in the community, business, and Littleton specific flyers.	In previous permit years, the Town completed storm drain stenciling and placed information in the <i>Watts &amp; Drops</i> newsletter discussing the community notification system in place for use in emergency situations such as hazardous waste spills, etc. No additional information regarding IDDE was distributed to the general public during Year 13.	The Town will continue to educate the community regarding illicit discharges through the <i>Watts &amp; Drops</i> newsletter and its storm drain stenciling program as resources allow.
Revised					The Littleton Electric Light and Water Department mailed the brochure entitled, "Two New Stormwater Bylaws" to all Littleton residents as a bill stuffer in April 2016 which included an explanation of the <i>Illicit Connections and Discharges to Storm Drain System Bylaw</i> and FAQs about what is allowed in the drainage system
<b>3E</b>	REQUIRED: Illicit Discharge Education for Municipal Employees	Water Dept.	Include illicit discharge education in training under measure 6	During Year 13, both staff from the Littleton Highway Department and the Littleton Water Department participated in an IDDE Training that was held by the Northern Middlesex Stormwater Collaborative.	The Town will continue to provide IDDE training to municipal employees.

#### 4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities - Permit Year 14 (if applicable)
<b>4A</b>	REQUIRED: Construction Site Runoff Bylaw / Regulatory Mechanism	Water Dept / Planning	Initial discussions; Review current local/state regulations; Review proposed samples. Develop draft bylaw, involve and educate public etc. Implement bylaw by year 3.	The Town's Subdivision Regulations require submittal of an erosion and sedimentation control plan to mitigate and prevent erosion/sedimentation of disturbed areas during and after construction activities. Article IV of the Town's Existing Zoning Bylaws outline site plan requirements for other types of development within Town and reference the Subdivision Regulations. Additionally, the Conservation Commission requires erosion and sediment control through the Town's Wetlands Bylaw and Regulations and related State code.  <i>A Stormwater Management and Erosion Control Bylaw</i> is proposed for adoption at the May 2, 2016 Annual Town Meeting. This bylaw will require Planning Board oversight of erosion and sediment control and stormwater runoff for construction sites <b>disturbing one acre of land or more that may have been otherwise exempt from local permitting.</b>	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised					
<b>4B</b>	REQUIRED: BMPs for Construction Site Erosion, Sediment, and Waste Controls	Water Dept / Planning	Assess existing and brainstorm proposed. Prepare draft to include in bylaw. Implement bylaw by year 3.	Refer to BMP 4A for regulatory mechanisms. Littleton's requirements for construction site controls are consistent with the MA Stormwater Handbook and EPA's Construction General Permit requirements.	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised					
<b>4C</b>	REQUIRED: Construction Site Plan Review Procedures	Water Dept / Planning	Assess existing and brainstorm proposed Prepare draft to include in bylaw. Implement review by year 3.	The Town's Subdivision Regulations and Article IV of the Town's Zoning Bylaws outline site plan requirements for approval by the Planning Board. On September 26, 2013, the Town also adopted written Site Plan Review Procedures. The Planning Board also has a Site Plan Review Checklist that they utilize.	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised					
<b>4D</b>	REQUIRED: Construction Site Inspection and Enforcement Procedures	Water Dept / Planning	Assess existing and brainstorm proposed Prepare draft to include in bylaw. Implement inspections by year 3.	The applicable Conservation Commission and Planning Board permitting outline site inspection requirements during construction.	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.

<b>4E</b>	REQUIRED: Response to Public – “Stormwater Hotline	Water Dept	Implement “storm water hotline”. Advertise and test hotline. Implement hotline by year 3.	In Year 13, stormwater management issues remained the responsibility of the Highway and Water Departments through a 24-hour per day, 7-day per week call center. Illicit discharges are also reported to the Board of Health.	The Highway & Water Department will continue to operate their call center. The Board of Health will also continue to receive reports of illicit discharges.
Revised					

## 5. Post-Construction Stormwater Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities - Permit Year 14 (if applicable)
<b>5A</b>	REQUIRED: Post-Construction Site Runoff Bylaw / Regulatory Mechanism	Water Dept / Planning	Initial discussion; Review current local/state regulations; Review proposed samples. Develop draft bylaw, involve and educate public. Float new bylaw by year 3 for one year comment period.	Post-construction stormwater management is required for Subdivision approval and to obtain an Order of Conditions under the Wetlands Bylaw. Additionally, Article IV of the Town's existing Zoning Bylaws outline site plan requirements for other types of development within Town and reference the Subdivision Regulations.	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised				<p>At the May 5, 2007 Town Meeting, amendments to the Town's Zoning Bylaw were adopted that incorporated by reference a <i>Low Impact Design/Best Management Practices Manual</i> into the bylaw.</p> <p>A <i>Stormwater Management and Erosion Control Bylaw</i> is proposed for adoption at the May 2, 2016 Annual Town Meeting. This bylaw will regulate post-construction stormwater runoff for both new and redevelopment projects and will require Planning Board oversight of sites <b>disturbing one acre of land or more that may have been otherwise exempt from local permitting</b>.</p>	
<b>5B</b>	REQUIRED: Choose Structural and Non-Structural BMPs	Water Dept / Planning	Assess existing and brainstorm proposed. Prepare draft to include in draft bylaw. Implement bylaw in year 3.	The <i>Low Impact Design/Best Management Practices Manual</i> incorporated by reference into the Town's Zoning Bylaw outlines those BMPs that constitute low impact development and are available for use in Littleton. The Town's Subdivision Regulations, Wetlands Bylaw, and proposed Stormwater Management and Erosion Control Bylaw also require drainage designs to conform to the MassDEP Stormwater Handbook.	The Town will continue to enforce their existing design standards during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised					

<b>5C</b>	REQUIRED: Long-Term BMP Operation and Maintenance Procedures	Water Dept / Planning	Assess existing and brainstorm proposed. Prepare draft to include in draft bylaw. Implement bylaw in year 3.	<p>The <i>Low Impact Design/Best Management Practices Manual</i> incorporated by reference into the Town's Zoning Bylaw requires applicants to summarize the operation and maintenance (O&amp;M) required for each BMP planned on site, including schedule for required activities, estimated costs, and responsible parties. During Year 13, the Town continued to enforce this new section of their Zoning Bylaw that they adopted.</p> <p>The Town's Subdivision Regulations, Wetlands Bylaw, and proposed Stormwater Management and Erosion Control Bylaw all require an O&amp;M Plan and provisions to require long-term O&amp;M of private BMPs consistent with MassDEP's Stormwater Handbook.</p>	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised					
<b>5D</b>	REQUIRED: Structural BMP Implementation Procedures	Water Dept / Planning	Assess existing and brainstorm proposed. Prepare draft to include in the draft bylaw. Implement bylaw in year 3.	<p>The <i>Low Impact Design/Best Management Practices Manual</i> incorporated by reference into the Town's Zoning Bylaw outlines procedures that developers should follow when implementing structural BMPs with the goal of minimizing water quality impacts and maintaining pre-development runoff conditions. The Town's Subdivision Regulations, Wetlands Bylaw, and proposed Stormwater Management and Erosion Control Bylaw also require drainage designs to conform to the MassDEP Stormwater Management Handbook.</p>	The Town will continue to enforce their existing bylaws during Year 14, as well as make enhancements to their existing municipal code as needed.
Revised					

## 6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 13 (Reliance on non-municipal partners indicated, if any)	Planned Activities - Permit Year 14 (if applicable)
<b>6A</b>	REQUIRED: Employee Training to Prevent/Reduce Stormwater Pollution	Highway / Water Dept.	Assess who, when, and what topics; Create schedule and checklist. Sample/test training.	In previous permit years staff from the Littleton Highway Department and the Littleton Water Department participated in a Good Housekeeping and Pollution Prevention Training that was held by the Northern Middlesex Stormwater Collaborative.	The Town will continue to complete employee training on how to prevent/reduce stormwater pollution through good housekeeping practices.
Revised					
<b>6B</b>	REQUIRED: Maintenance/Inspection of Storm Sewers and Structural/Non Structural Controls	Highway	Develop New/Improved Schedules and Procedures.	The Town continued to maintain and inspect their storm drainage system, and make repairs as needed during Year 13. All streets were swept at least once, and 25% of the Town's catch basins were cleaned. Debris in catch basins has been reduced due to elimination of sand application as part of the Town's de-icing operations.	The Town will continue to maintain and inspect their storm drainage system, and make repairs as needed. Catch basins will continue to be cleaned and streets will be continued to be swept on an annual basis.
Revised			No change to existing operational procedures warranted.		
<b>6C</b>	REQUIRED: Pollutant Source Reduction / Elimination from Municipal Facilities & Activities	Highway	Fully Implement proposed BMPs	During Year 13, the Town continued to follow the existing Oil Spill Prevention, Control, and Countermeasure (SPCC) Plan for the DPW Garage and Water Department (contiguous facilities), implemented BMPs, and took actions to reduce pollutants generated from municipal facilities and activities.	The Town will update and recertify the Oil SPCC Plan to account for the decommissioning of existing underground storage tanks and installation of new above tanks.
Revised					
<b>6D</b>	REQUIRED: Waste Disposal Procedures from Storm Sewers & Municipal Facilities/Activities	Highway	Assess existing waste disposal procedures. Develop draft procedures.	<b>BMP Completed Year 3.</b> The Town continued to follow their established waste disposal procedures for street sweeping and cleaning of their drainage system, which were previously evaluated and determined to be adequate.	The Town will continue to follow State and local policy (as it is updated) governing waste disposal procedures for street sweeping and cleaning of their drainage system.
Revised					
<b>6E</b>	Reduction of Sand in De-icing Operations	Highway	Reduction/elimination of sand in de-icing operations to reduce street sweeping/catch basin waste.	The Town continued their use of sodium chloride with a magnesium chloride mixer for deicing. The use of sodium deicing, particularly the amount of sodium and liquid amounts necessary per application, is discussed with employees prior to the start of snow and ice operations. Sand is no longer used for deicing in Town. This has reduced the amount of sediment found in catch basins and the amount of sediment associated with street sweeping operations.	The Town will continue to use sodium chloride with a magnesium mixer for deicing.
Revised					

## **7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA).**

At the time the NOI was submitted, there were no approved TMDLs for water bodies directly receiving MS4 discharges where the pollutant is likely to be found in stormwater. However, most of the urbanized area to the east of Route 495 is within the Assabet River watershed, which has been subject to an approved TMDL for Phosphorus since September 2004. The Town is already implementing a number of BMPs that reduce phosphorous within the watershed area (such as the Long Pond beach stormwater retrofits and ongoing Public Education and Good Housekeeping measures). While the Town does not discharge stormwater directly to the Assabet River, the 2016 General Permit will require additional BMPs to reduce phosphorous loadings to receiving waters in the watershed.

There are also impaired receiving waters in Littleton that require the development of a TMDL, as listed on the Final 2014 Integrated List of Waters, including Beaver Brook, Bennetts Brook, Long Pond, Mill Pond, Reedy Meadow Brook, and Spectacle Pond. The Town will also reevaluate the need for additional BMPs for these watersheds as part of the Stormwater Management Plan for the reissued General Permit.

### **7b. WLA Assessment**

Not applicable at this time.

### **Part IV. Summary of Information Collected and Analyzed**

No additional information has been collected or analyzed outside of what was listed in Part III above.