

Part I: General Conditions

General Information

Name of Municipality or Organization: State:

EPA NPDES Permit Number (if applicable):

Primary MS4 Program Manager Contact Information

Name: Title:

Street Address Line 1:

Street Address Line 2:

City: State: Zip Code:

Email: Phone Number:

Fax Number:

Other Information

Stormwater Management Program (SWMP) Location (web address or physical location, if already completed):

Eligibility Determination

Endangered Species Act (ESA) Determination Complete? Eligibility Criteria (check all that apply): ☐ A ☐ B ☒ C

National Historic Preservation Act (NHPA) Determination Complete? Eligibility Criteria (check all that apply): ☒ A ☐ B ☐ C

☒ Check the box if your municipality or organization was covered under the 2003 MS4 General Permit

MS4 Infrastructure (if covered under the 2003 permit)

Estimated Percent of Outfall Map Complete? If 100% of 2003 requirements not met, enter an estimated date of completion (MM/DD/YY):

Web address where MS4 map is published:

If outfall map is unavailable on the internet an electronic or paper copy of the outfall map must be included with NOI submission (see section V for submission options)

Regulatory Authorities (if covered under the 2003 permit)

Illicit Discharge Detection and Elimination (IDDE) Authority Adopted? <i>(Part II, III, IV or V, Subpart B.3.(b.) of 2003 permit)</i>	Yes	Effective Date or Estimated Date of Adoption (MM/DD/YY): 03/06/08
Construction/Erosion and Sediment Control (ESC) Authority Adopted? <i>(Part II,III,IV or V, Subpart B.4.(a.) of 2003 permit)</i>	Yes	Effective Date or Estimated Date of Adoption (MM/DD/YY): 05/20/08
Post- Construction Stormwater Management Adopted? <i>(Part II, III, IV or V, Subpart B.5.(a.) of 2003 permit)</i>	Yes	Effective Date or Estimated Date of Adoption (MM/DD/YY): 05/20/08

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part II: Summary of Receiving Waters

Please list the waterbodies to which your MS4 discharges. For each waterbody, please report the number of outfalls discharging into it and, if applicable, the segment ID and any impairments.

Massachusetts list of impaired waters: [Massachusetts 2014 List of Impaired Waters- http://www.mass.gov/eea/docs/dep/water/resources/07v5/14list2.pdf](http://www.mass.gov/eea/docs/dep/water/resources/07v5/14list2.pdf)

Waterbody that receives flow from the MS4 and segment ID if applicable	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
MA84B-04 Assabet River	29	☐	☐	☒	☐	☐	☒	☐	☐	☐	Excess Algal Growth, Fecal coliform, Aquatic Plants
MA82B-05 Assabet River		☐	☐	☒	☐	☐	☒	☐	☐	☐	Excess Algal Growth, Fecal coliform, Aquatic Plants, Trash, Non-native Aquatic Plants
MA82042 Fort Meadow Reservoir	4	☐	☐	☐	☐	☐	☐	☐	☒	☐	
MA82011 Boons Pond		☐	☐	☐	☐	☐	☒	☐	☐	☐	Mercury , Non-native Aquatic Plants
MA82B-19 Danforth Brook	9	☐	☐	☐	☐	☐	☐	☐	☐	☐	
MA8107 Tripp Pond	2	☐	☐	☐	☐	☐	☐	☐	☐	☐	
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Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs). For municipalities/organizations whose MS4 discharges into a receiving water with an approved Total Maximum Daily Load (TMDL) and an applicable waste load allocation (WLA), identify any additional BMPs employed to specifically support the achievement of the WLA in the TMDL section at the end of part III.

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

MCM 1: Public Education and Outreach

BMP Media/Category (enter your own text to override the drop down menu)	BMP Description	Targeted Audience	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal	Beginning Year of BMP Implementation
Mailing	Consumer Confidence Report Ad	Residents	Public Works	Deliver Annually	2018
Mailing	Consumer Confidence Report Ad	Businesses, Institutions and Commercial Facilities	Public Works	Deliver Annually	2018
Brochures/Pamphlets	Handout provided to licensed water and sewer contractors	Developers (construction)	Public Works	Deliver during building permit	2018
Mailing	Consumer Confidence Report Ad	Industrial Facilities	Public Works	Ongoing availability	2018
Web Page	Spring Fertilizer, Septic, Summer Pet Waste, and Fall Leaf Pick-up	Residents	Public Works	Post Annually	2018
Web Page	Spring Fertilizer, Septic, Summer Pet Waste, and Fall Leaf Pick-up	Businesses, Institutions and Commercial Facilities	Public Works	Post Annually	2018
	Handout provided to licensed water and sewer contractors	Developers (construction)	Public Works	Ongoing availability	2018
Web Page	Spring Fertilizer, Septic, Summer Pet Waste, and Fall Leaf Pick-up	Industrial Facilities	Public Works	Post Annually	2018
Brochures/Pamphlets	During Dog Licensing	Residents	Public Works	Deliver during dog licensing	2018

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 2: Public Involvement and Participation

[illegible]

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary *(continued)*

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

BMP Categorization (enter your own text to override the drop down menu)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
SSO inventory	Develop SSO inventory in accordance of permit conditions	Public Works	Complete within 1 year of effective date of permit	2018
Storm sewer system map	Create map and update during IDDE program completion	Public Works	Update map within 2 years of effective date of permit and complete full system map 10 years after effective date of permit	2018
Written IDDE program	Create written IDDE program	Public Works	Complete within 1 year of the effective date of permit and update as required	2018
Implement IDDE program	Implement catchment investigations according to program and permit conditions	Public Works	Complete 10 years after effective date of permit	2018
Employee training	Train employees on IDDE implementation	Public Works	Train annually	2018
Conduct dry weather screening	Conduct in accordance with outfall screening procedure and permit conditions	Public Works	Complete 3 years after effective date of permit	2018
Conduct wet weather screening	Conduct in accordance with outfall screening procedure	Public Works	Complete 10 years after effective date of permit	2018
Ongoing screening	Conduct dry weather and wet weather screening (as necessary)	Public Works	Complete ongoing outfall screening upon completion of IDDE program	2018

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary *(continued)*

MCM 4: Construction Site Stormwater Runoff Control

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
Site inspection and enforcement of Erosion and Sediment Control (ESC) measures	Complete written procedures of site inspections and enforcement procedures	Planning/zoning Department	Complete within 1 year of the effective date of permit	2018
Site plan review	Complete written procedures of site plan review and begin implementation	Planning/zoning Department	Complete within 1 year of the effective date of permit	2018
Erosion and Sediment Control	Adoption of requirements for construction operators to implement a sediment and erosion control program	Planning/zoning Department	Complete within 1 year of the effective date of permit	2018
Waste Control	Adoption of requirements to control wastes, including but not limited to, discarded building materials, concrete truck wash out, chemicals, litter, and sanitary wastes	Planning/zoning Department	Complete within 1 year of the effective date of permit	2018

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
As-built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Planning/zoning Department	Require submission of as-built plans for completed projects	2018
Target properties to reduce impervious areas	Identify at least 5 permittee-owned properties that could be modified or retrofitted with BMPs to reduce impervious areas and update annually	Department of Public Works	Complete 4 years after effective date of permit and report annually on retrofitted properties	2019
Allow green infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	Planning/zoning Department	Complete 4 years after effective date of permit and implement recommendations of report	2020
Street design and parking lot guidelines	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.	Public Works	Complete 4 years after effective date of permit and implement recommendations of report	2020

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

MCM 6: Municipal Good Housekeeping and Pollution Prevention

BMP Categorization (enter your own text to override the drop down menu or entered text)	BMP Description	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal (all text can be overwritten)	Beginning Year of BMP Implementation
O&M procedures	Create written O&M procedures including all requirements contained in 2.3.7.a.ii for parks and open spaces, buildings and facilities, and vehicles and equipment	Public Works	Complete and implement 2 years after effective date of permit	2019
Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment	Create inventory	Public Works	Complete 2 years after effective date of permit and implement annually	2019
Infrastructure O&M	Establish and implement program for repair and rehabilitation of MS4 infrastructure	DPW Operations	Complete 2 years after effective date of permit	2018
Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities	Public Works	Complete and implement 2 years after effective date of permit	2019
Catch basin cleaning	Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule	DPW Operations	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	2018
Street sweeping program	Sweep all streets and permittee-owned parking lots in accordance with permit conditions	DPW Operations	Sweep all streets and permittee-owned parking lots once per year in the spring	2018
Road salt use optimization program	Establish and implement a program to minimize the use of road salt	DPW Operations	Implement salt use optimization during deicing season	2018

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Total Maximum Daily Load (TMDL) Requirements

Use the drop-down menus to select the applicable TMDL, action description to meet the TMDL requirements, and the responsible department/parties. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Part III: Stormwater Management Program Summary (continued)

Actions for Meeting Requirements Related to Water Quality Limited Waters

Use the drop-down menus to select the pollutant causing the water quality limitation and enter the waterbody ID(s) experiencing excursions above water quality standards for that pollutant. In addition, if you are subject to additional requirements due to a downstream nutrient impairment (see Part 2.2.2 of the permit) select the pollutant of concern and indicate applicable waterbody IDs or write "all waterbodies" if applicable. Choose the action description from the dropdown menu and indicate the responsible party. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]

Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.1 and 2.2.2 that you have identified as not applicable to your MS4 because you do not discharge to the impaired water body or a tributary to an impaired water body due to nitrogen or phosphorus. Provide all supporting documentation below or attach additional documents if necessary. Also, provide any additional information about your MS4 program below.

Click to add text

Part V: Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:

Title:

Signature:

Date:

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name

Notice of Intent (NOI) for coverage under Small MS4 General Permit

Page 18 of 18

Part V: 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.

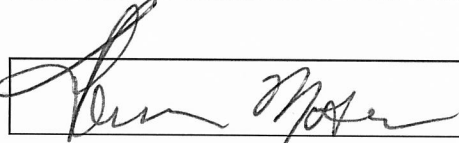
Name:

Thomas Moses

Title:

Executive Assistant

Signature:



Date:

9/19/18

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name



TOWN OF HUDSON
DEPARTMENT OF PUBLIC WORKS
1 MUNICIPAL DRIVE
HUDSON, MA 01749
TEL. 978 562 9333
FAX. 978 568 9612

Newton Tedder
US Environmental Protection Agency
Stormwater and Construction Permits Section (OEP06-1)
Five Post Office Square, Suite 100
Boston, MA 02109

The Town of Hudson (MS4 permittee) has determined that the discharges regulated under this permit do not have the potential to cause effects on National Register of Historic Properties.

The implementation of this Stormwater Management Plan (SWMP) will require development of standards of practice, compliance documentation, investigation and operations of existing drainage facilities, local regulatory policies and other studies. The SWMP does not obligate the Town of Hudson to undertake any activity involving subsurface land disturbance and program implementation will only take place on existing municipal separate storm sewer systems that have been previously authorized for coverage under the MS4 General Permit.

If during the course of MS4 General Permit program implementation, the Town of Hudson anticipates subsurface land disturbance as a result of this General Permit, the City will prepare a complete information submittal to the State Historic Preservation Office.

Sincerely,

Eric Ryder
Public Works Director
Town of Hudson
978-562-9333
eryder@townofhudson.org



TOWN OF HUDSON
DEPARTMENT OF PUBLIC WORKS
1 MUNICIPAL DRIVE
HUDSON, MA 01749
TEL. 978 562 9333
FAX. 978 568 9612

August 29, 2018

Newton Tedder
US Environmental Protection Agency
Stormwater and Construction Permits Section (OEP06-1)
Five Post Office Square, Suite 100
Boston, MA 02109

Re: Endangered Species Determination for Hudson, MA Associated with the MA MS4 General Permit

Dear Mr. Tedder:

The Town of Hudson, MA is a non-federal representative designated by the Environmental Protection Agency (EPA) for conducting formal or informal consultation with the U.S. Fish and Wildlife Service.

I have evaluated the United States Fish & Wildlife Service iPaC Biological and Conservation Data System files in response to new regulation promulgation under the 2016 Massachusetts Municipal Separate Sewer System (MS4) General Permit. The objective of this review is to determine the presence of endangered or threatened species within the program implementation area in Hudson, MA.

Our review evaluated the area of impact of required program activities, analysis of these program activity areas within the iPaC database, examining maps, other sources of information, and the personal knowledge of staff or cooperating experts.

According to the information currently in the iPaC database, there are two threatened species within the proposed project area (Northern Long-Eared Bat) and no critical habitat. Please see Attachment 1 as the official species list.

The proposed stormwater program activities are a continuation of previous permitted activities and include non-structural management of stormwater runoff as required by the MA MS4 General Permit. These activities will include education, investigation, and pollutant source control on existing municipal facilities and roadways and will not disturb terrestrial vegetation. The listed species is sensitive to land disturbance and as the program implementation will not disturb vegetation we have therefore determined that our programmatic activities will have "no affect" on the listed species.

If during the course of the permit term we plan to install structural stormwater treatment practices or engage in other land disturbing activities as a result of compliance with the MS4 General Permit, the Town of Hudson will initiate further informal or formal consultation with the USFWS.

Based on this review and an evaluation of determination requirements outlined in Appendix C of the MA MS4 General Permit, we have determined that we meet Criterion C. We request EPA's concurrence of this determination for inclusion in our Stormwater Management Program Plan.

Please do not hesitate to contact me if you have further questions about Hudson's stormwater management program.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. M. Ryder", is positioned above the typed name.

Eric Ryder
Public Works Director
Town of Hudson
978-562-9333
eryder@townofhudson.org



United States Department of the Interior

FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
<http://www.fws.gov/newengland>



In Reply Refer To:
Consultation Code: 05E1NE00-2017-SLI-1366
Event Code: 05E1NE00-2018-E-06630
Project Name: Hudson MA

August 21, 2018

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
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Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
(603) 223-2541

Project Summary

Consultation Code: 05E1NE00-2017-SLI-1366

Event Code: 05E1NE00-2018-E-06630

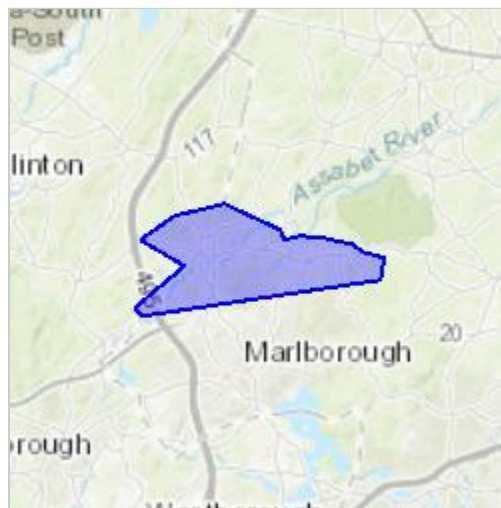
Project Name: Hudson MA

Project Type: Regulation Promulgation

Project Description: The proposed stormwater program activities are a continuation of previous permitted activities and include non-structural management of stormwater runoff as required by the MA MS4 General Permit. These activities will include education, investigation, and pollutant source control on existing municipal facilities and roadways and will not disturb terrestrial vegetation. Existing stormwater discharge water quality will be improved through the implementation of the permit program.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/42.389483325040715N71.52963020742018W>



Counties: Middlesex, MA | Worcester, MA

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.



CM 1: Public Education and Outreach (Permit Section 2.3.2)

Objective: Implement an education program that addresses stormwater issues of significance. The ultimate objective of a public education program is to increase knowledge of and help change behaviors of the public so that pollutants in stormwater are reduced. The “public” as defined in the MS4 General Permit are residents, businesses/institutions, developers/contractors, and industrial facilities.

BMP ID #	BMP Description	Permit Section Reference	Measurable Goal(s)	Deadline(s)
1.1	Develop public education program plan (Education and Outreach Plan)	2.3.2.a	Develop a written Education & Outreach (E&O) Plan which will outline an implementation approach that is inclusive of all education requirements across the Permit and for all impaired waters’ special provisions. • Develop educational messages to be distributed to target audiences, consider the topics listed in 2.3.2.d of the MS4 General Permit. • Develop educational messages specific to the areas that discharge to priority waters, impaired waters, and drinking water supplies (where applicable). • Plan to provide educational web content and other publicly accessible resources. • Consider needs specific to the community: language, types of businesses, etc. • Develop methods to evaluate effectiveness of the messages and overall education program.	End of Permit Year (PY) 1
1.2	Deliver targeted/timed educational messages	2.3.2.c	Post educational messages on the Town website. Maintain educational content throughout the Permit term.	End of PY 1
			Distribute a minimum of 1 additional educational message to each of the 4 target audiences. (Ensure that messages to each audience are at least 1 year apart.)	End of PY 2
			Distribute a minimum of 1 educational message to each of the 4 target audiences (residents, commercial, construction, industrial.)	End of PY 5
1.3	Deliver supplemental educational messages in areas that discharge to Total Phosphorus impaired waterbodies. (Assabet River	2.2.2.b.i.1 & Appendix F Part A.V.	For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute 1 educational message in March/April timeframe of each Permit year that pertains to proper disposal of grass clippings and fertilizer use.	Annual (March/April)
			For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute 1 educational message in the June/July timeframe of each Permit year that pertains to proper pet waste management.	Annual (June/July)



BMP ID #	BMP Description	Permit Section Reference	Measurable Goal(s)	Deadline(s)
	– Segment ID: MA82B-04 and MA82B-05 and Fort Meadow Reservoir: MA82042)		For areas that discharge to waterbodies with a Total Phosphorus impairment, distribute 1 educational message in Aug./Sept./Oct. timeframe of each Permit Year that pertains to proper disposal of leaf litter.	Annual (Aug/Sept/Oct)
1.4	Deliver supplemental educational messages in areas that discharge to bacteria or pathogen impaired waterbodies (Assabet River – Segment ID: MA82B-04 and MA82B-05)	2.2.2.c.i.1 & Appendix H part III	For areas that discharge to bacteria or pathogen impaired water bodies, provide educational materials to dog owners at the time of issuance or renewal of a dog license, or other appropriate time. These education materials describe the detrimental impacts of improper management of pet waste, requirements for waste collection and disposal, and penalties for noncompliance.	Through-out Permit term
			For areas that discharge to bacteria or pathogen impaired water bodies, provide educational materials to owners of septic systems about proper maintenance (as applicable).	Annual
1.5	Assess educational program and modify if needed	2.3.2.e	Assess effectiveness of the educational program per the E&O Plan and modify messages if needed. Modify ineffective messages, if any, prior to next message delivery.	Annual



MEMORANDUM

TO: Eric Ryder
CC: Rachel Gilbert and Max Hamel
FROM: Zach Henderson
DATE: August 29, 2018
RE: Town of Hudson – Stormwater Education and Outreach Plan

Per Section 2.3.2 of the effective Municipal Separate Storm Sewer System (MS4) General Permit (Permit), the permittee shall implement an education program that includes educational goals based on stormwater issues of significance within the MS4 area. The education requirements across the Permit and for all impaired waters' special provisions were discussed with the Town of Hudson on August 29, 2018. The attached schedule is the preferred outreach and required notification frequency. The annual schedule can vary, and outreach content can be modified, but the frequency of messaging is dictated by the Permit

Annual Outreach via Print Media

Education and outreach ads will be distributed to four target audiences: residents, commercial, construction, and industrial and may focus on phosphorus and bacterial/pathogens issues (Hudson's receiving water impairments). Outreach to the four target audiences will be distributed annually through the Consumer Confidence Report and may include varying messages each year specific to pollutants of concern. Additionally, an Erosion and Sediment Control brochure will be provided on an ongoing basis to water, sewer and drain contractors that must be licensed with the Town. The Health Department will provide septic outreach via brochures and Town Clerk's office will provide brochures during dog licensing.

Seasonal Outreach via Web

For areas that discharge to bacteria/pathogen or phosphorus impaired water bodies (or Town wide), Public Works will provide educational outreach according to the timeline below and via internet postings:

- **March & April:** For areas that discharge to waterbodies with phosphorus impairments, distribute one educational message to proper disposal of grass clippings and fertilizer use.
- **May:** For areas that discharge to waterbodies with bacteria impairments, distribute one educational message on proper maintenance of septic systems.
- **June & July:** For areas that discharge to waterbodies with a phosphorus and/or bacteria impairment, distribute one educational message that pertains to proper pet waste management (also covered in continuous dog licensing outreach).
- **August, September, & October:** For areas that discharge to waterbodies with a phosphorus impairment distribute one educational message that pertains to proper disposal of leaf litter.

Public Participation Activities

In partnership with the Town of Hudson Internal Traffic Committee, the Town will hold one public meeting annually for the review of the SWMP and Annual MS4 report. These meetings will be held in late summer each year upon completion of the Annual Report.

MS4 Education and Outreach Schedule

Hudson, MA

ANNUAL/ONGOING NOTICE SCHEDULE

Group	Notification Type	Medium
RESIDENTIAL	General Stormwater Program Awareness, Septic Maintenance, Pet Waste	Consumer Confidence Report, Health and Dog Licensing Handouts
COMMERCIAL	General Stormwater Awareness	Consumer Confidence Report
INDUSTRIAL	General Stormwater Awareness	Consumer Confidence Report
CONSTRUCTION	Town Erosion and Sediment Control Standards	Licensed Contractor Handout

SEASONAL NOTICE SCHEDULE

January
NOTIFICATION:
MEDIUM
TARGET AUDIENCE:
April
NOTIFICATION:
Proper disposal of grass clippings and fertilizer use
MEDIUM
Website
TARGET AUDIENCE:
Residential, Commercial and Industrial
July
NOTIFICATION:
Proper pet waste management
MEDIUM
Website
TARGET AUDIENCE:
Dog Owners/Residential
October
NOTIFICATION:
Proper disposal of leaf litter
MEDIUM
Website
TARGET AUDIENCE:
Residential, Commercial and Industrial

February
NOTIFICATION:
MEDIUM
TARGET AUDIENCE:
May
NOTIFICATION:
Proper Septic System Management
MEDIUM
Website
TARGET AUDIENCE:
Residential, Commercial and Industrial
August
NOTIFICATION:
Proper disposal of leaf litter
MEDIUM
Website
TARGET AUDIENCE:
Residential, Commercial and Industrial
November
NOTIFICATION:
MEDIUM
TARGET AUDIENCE:

March
NOTIFICATION:
Proper disposal of grass clippings and fertilizer use
MEDIUM
Website
TARGET AUDIENCE:
Residential, Commercial and Industrial
June
NOTIFICATION:
Proper pet waste management
MEDIUM
Website
TARGET AUDIENCE:
Dog Owners/Residential
September
NOTIFICATION:
Proper disposal of leaf litter
MEDIUM
Website
TARGET AUDIENCE:
Residential, Commercial and Industrial
December
NOTIFICATION:
MEDIUM
TARGET AUDIENCE:

From: [Eric Ryder](#)
To: [Kozminski, Michelle](#); zhenderson@woodardcurran.com
Cc: [Reports Stormwater](#)
Subject: RE: Small MS4 NOI submission - additional or corrected information required
Date: Tuesday, October 09, 2018 3:35:58 PM
Attachments: [E&O BMPs.pdf](#)
[2018.08.29 Education&Outreach Plan.pdf](#)

Ms. Kozminski,

The Town of Hudson is in receipt and has reviewed the Small MS4 NOI Information Requested attachment in your email from Friday, October 5. The following are our responses, as requested, with the original EPA request below.

EPA Request

Please provide an estimate of outfalls to each receiving waterbody.

Response: The Town of Hudson does have several waterbodies within the urbanized area that do not have Town-owned direct MS4 discharges or also may not have any MS4 infrastructure in proximity to the waterbody. In those cases we listed the waterbody in the NOI but left the number of outfalls blank. The NOI form does not accept 0 as an option. We are okay if you wish to remove these waters from the NOI.

EPA Request

Please provide more details (a quick description) of what the second message to developers will likely be.

Response: We will be meeting regulatory obligations for developers and will be providing ongoing annual outreach via brochures during annual relicensing for contractors under local obligations to be a certified contractor in Hudson. We simply did not include this ongoing outreach in two rows as it is an annual activity which should exceed expectations. We have attached an excerpt from our SWMP regarding these BMPs which provides additional detail on our measurable goals and also our Annual Education and Outreach Plan for messaging details.

Thank you and let us know if you need additional information or details,

Eric Ryder

Director Of Public Works
1 Municipal Drive, Hudson MA
Phone: 978-562-9333
Fax: 978-310-5075
Email: eryder@townofhudson.org

-----Original Message-----

From: Kozminski, Michelle [<mailto:kozminski.michelle@epa.gov>]
Sent: Friday, October 05, 2018 12:32 PM
To: Eric Ryder <eryder@townofhudson.org>; zhenderson@woodardcurran.com
Cc: Reports Stormwater <Stormwater.Reports@epa.gov>
Subject: Small MS4 NOI submission - additional or corrected information required

Hello,

EPA requires additional or corrected information to receive a complete NOI submission for your MS4 and continue the review process.

Please respond to this email with the requested details in the attached report. You do not need to resubmit your

entire NOI form. Please respond with the requested information as soon as you can. If the additional information is not received within 30 days of the date on this email EPA may initiate the process to deny your NOI, unless additional time is granted by EPA for such submission.

Please let me know if you have any questions.

Thanks,
Michelle

Michelle Kozminski
U.S. EPA Region 1
5 Post Office Square-OEP06-4
Boston, MA 02109-3912
617-918-1222