

2023 ANNUAL STORMWATER REPORT - DRAFT

Town of Wilton

Connecticut

March 30, 2024

WILTON PUBLIC WORKS DEPARTMENT TOWN HALL ANNEX 238 Danbury Road Wilton, Connecticut 06897

MS4 General Permit Town of Wilton 2023 Annual Report Existing MS4 Permittee Permit Number GSM 000040 (January 1, 2023 – December 31, 2023)

This report documents the Town of Wilton's efforts to comply with the conditions of the MS4 General Permit to the maximum extent practicable (MEP) from January 1, 2023 to December 31, 2023.

Part I: Summary of Minimum Control Measure Activities

1. Public Education and Outreach (Section 6 (a)(1) / page 19)

ВМР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
1-1 Continue public education and outreach	On-going	See Below	See Below	Town Depts, Commissions, & Partners	On-going	On-going	
1-2 Address education/ outreach for pollutants of concern	Completed	Publish & maintain informative articles and links on website	Newsletters via website	Conservation Commission / Environmental Affairs	Annually	On-going	

1.2 Describe any Public Education and Outreach activities planned for the next year, if applicable.

All of the above activities are planned for 2024.

Maintenance

1.3 Details of activities implemented to educate the community on stormwater

Program Element/Activity	Audience (and number of people reached)	Topic(s) covered	Pollutant of Concern addressed (if applicable)	Responsible dept. or partner org.
Website Articles and Links	Town of Wilton residents and website viewers	Invasive Species Education Resources – Wilton Conservation Commission	Many	Conservation Commission / Environmental Affairs
Action Plan for Education and Outreach	Town of Wilton residents and website viewers	The Norwalk River Watershed Action Plan – "It's our watershed, let's take care of it"	Many	Environmental Affairs/NRWI

2. Public Involvement/Participation (Section 6(a)(2) / page 21)

ВМР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
2-1 Comply with public notice requirements for the Stormwater Management Plan	Completed	Posted Public Notice & Stormwater Management Plan on Town Website	Comply with permit requirements	DPW	4/3/18	4/3/18	
2-1 Comply with public notice requirements for Annual Reports	Completed	Posted Public Notice and 2023 Annual Report on Town Website, Draft in DPW Office	Years 2 – 5 30-day Public Notice for Annual Reports	DPW	2/15/24	2/15/24	Draft and Final Annual report is placed on Town Website each year
2-2 Sponsor Town-wide and Norwalk River Clean-up	Completed	Held Town-wide and Norwalk River Clean-up Day	Annual Cleanup	Conservation Commission/ Environmental Affairs, Trout Unlimited – Mianus Chapter	Annually	Annually – April 2, 2023	
2-3 Sponsor Household Hazardous Waste Day	Completed	Co-Sponsored Household Hazardous Waste Day with Town of Weston	Annual Collection Day	Environmental Affairs	Annually	September 7, 2023	
2-4 Sponsor Unused Medicine Drive & Manage On-going Collections	Completed	Held Unused Medicine Drive, Maintain Drop- off Box at Police Station	Annual Collection	Wilton Police Dept.	Annually	1/1/23 - 12/31/23 (On-going Collection/ Disposal)	
2-5 Sponsor Trees for Trout Collection Days (Christmas Tree Ecocycling)	Completed	Collected Christmas Trees from Residents (for stream bank stabilization projects)	Annual Collection Days	Trout Unlimited – Mianus Chapter	Annually	Annually	Town provided areas for collection & temporary stockpiling at Merwin Meadows Park

2.2 Describe any Public Involven	nent/Participation activities	planned for the next	year, if applicable.
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BMPs 2-1 through 2-5 are planned for 2023.

2.3 Public Involvement/Participation reporting metrics

Metrics	Implemented	Date	Posted
Availability of the Stormwater Management Plan announced to public	Y	4/3/17	http://www.wilton ct.org/
Availability of Annual Report announced to public	Y	2/15/24	http://www.wilton ct.org/departments /publicworks/storm water.html

3. Illicit Discharge Detection and Elimination (Section 6(a)(3) and Appendix B / page 22)

ВМР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
3-1 Develop written IDDE program	In-progress	Reviewing the CT IDDE program template for applicability	Develop written IDDE program	DPW	Jul 1, 2020	In progress	Conducted stormwater sampling in March 2022. Plan on conducting more sampling in 2024

3-2 Develop list and maps of all MS4 stormwater outfalls in priority areas	In progress	Preliminary desktop review and GIS mapping	Map Priority MS4 Outfalls	DPW	Jul 1, 2018	On-going	Created a GIS Collector application to locate outfall. Input of drainage system is ongoing.
3-3 Implement citizen reporting program	Completed	Town initiated SeeClickFix – illicit discharge complaint process included	Citizen Reporting Process	First Selectwoman, DPW / IT	Jul 1, 2017	9/29/17	Tracking is on-going
3-4 Establish legal authority to prohibit illicit discharges	In progress	Reviewing the IDDE legal authority requirements and ordinance template for applicability	Confirm adequacy of existing regulations or develop IDDE ordinance	DPW/P&Z/Town Counsel	Jul 1, 2018	In-progress	
3-5 Develop record keeping system for IDDE tracking	Complete	Health Dept presently files this information	IDDE Tracking System	Health Dept, DPW	Jul 1, 2017	On-going	Tracking system to be revised, if needed
3-6 Address IDDE in areas with pollutants of concern	On-going	See Section 3.5	Investigate & resolve illicit discharge complaints	Health Dept, DPW	Not Specified	On-going	Existing systems are in place for investigating and resolving illicit discharges

3.2 Describe any IDDE activities planned for the next year, if applicable.

The written program will be posted to the Dept of Public Works webpage when available and a link listed in Annual Reports.

3.3 List of citizen reports of suspected illicit discharges received during this reporting period.

Date of Report	Location / suspected source	Response taken
No reported discharges via SeeClickFix		

3.4 Provide a record of illicit discharges occurring during the reporting period and SSOs occurring July 2012 through end of reporting period using the following table.

Location (Lat long/ street crossing /address and receiving water)	Date and duration of occurrence	Discharge to MS4 or surface water	Estimated volume discharged	Known or suspected cause / Responsible party	Corrective measures planned and completed (include dates)	Sampling data (if applicable)
No reported discharges via SeeClickFix						

3.5 Briefly describe the method used to track illicit discharge reports, responses to those reports, and who was responsible for tracking this information.

Incidents are typically reported to the Wilton Health Department through resident call-ins, Town staff reports, and notifications from the watershed inspector. Residents can also report illicit discharges via the SeeClickFix tool on the Town website. Incidents are investigated in the field by Health Department staff, and property owners are notified as needed. Most incidents are resolved through on-site repairs. In some cases, sampling and further investigation is conducted. The Health Department files this information. Also, the Highway department investigates drainage system as part of the Town's Paving program. Drainage Infrastructure within 15 miles of road are inspected annually. Illicit discharges are investigated as part of the process.

3.6 Provide a summary of actions taken to address septic failures using the table below.

Location and nature of structure with failing septic systems	Actions taken to respond to and address the failures	Impacted waterbody or watershed, if known
44 Collinswood Road, Wilton, CT - Residential	System repaired/replaced by licensed septic installer, inspected by Town	
40 Seir Hill Road, Wilton, CT - Residential	System repaired/replaced by licensed septic installer, inspected by Town	
285 Belden Hill Road, Wilton, CT - Residential	System repaired/replaced by licensed septic installer, inspected by Town	
85 Chicken Street, Wilton, CT - Residential	System repaired/replaced by licensed septic installer, inspected by Town	
3 Liberty Street, Wilton, CT - Residential	System repaired/replaced by licensed septic installer, inspected by Town	

3.7 IDDE reporting metrics

Metrics	
Estimated or actual number of MS4 outfalls	Currently, 142 outfalls have been mapped on GIS- inputting additional outfalls is ongoing. There are many pipes on GIS indicating the discharge location, but may not be labeled as "Outfalls"
Estimated or actual number of interconnections	Unknown
Outfall mapping complete	<50% - Currently, 142 outfalls have been mapped on GIS- inputting additional outfalls is ongoing.
Interconnection mapping complete	Currently, 1874 pipe interconnections have been mapped on GIS. Inputting additional pipe interconnects is ongoing
System-wide mapping complete (detailed MS4 infrastructure)	<62%
Outfall assessment and priority ranking	Highway foreman observed 19 miles/year of roadway's worth of outfalls over the last 4 years. 4 miles worth of outfalls were observed in 2023 (Total miles in Wilton = 127 miles) each year for structural deficiencies or illicit discharges. Developing a tracking tool to collect this information is ongoing. Repairs are made in each respective year.
Dry weather screening of all High and Low priority outfalls complete	Tighe & Bond conducted dry weather water screening in 38 locations in 2022. And 10 outfalls were sampled. Additional screening and water samples are proposed in 2024.
Catchment investigations complete	TBD
Estimated percentage of MS4 catchment area investigated	TBD

PLEASE NOTE: GIS COLLECTOR APPLICATION WAS IMPLEMENTED IN OCTOBER OF 2019 TO CAPTURE STORM INFRASTRUCTURE, IMPROVEMENT and INVENTORY. THE TOWN IS IN THE PROCESS OF OBTAINING A GIS COLLECTOR APP TO ASSIST IN CAPTURING DRY WEATHER SCREENING AT OUTFALLS.

3.8 Briefly describe the IDDE training for employees involved in carrying out IDDE tasks including what type of training is provided and how often is it given (minimum once per year).

Informal training on illicit discharges is provided on an on-going basis for field crews. A meeting was held on September 11, 2019 with Highway department staff.

4. Construction Site Runoff Control (Section 6(a)(4) / page 25)

4.1 BMP Summary

ВМР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
4-1 Implement, upgrade, and enforce land use regulations to meet requirements of MS4 general permit	On-going	Enforcement of existing land use regulations	Upgrade land use regulations	P&Z, DPW	Jul 1, 2019	On-going	
4-2 Develop/Implement plan for interdepartmental coordination in site plan review and approval	Completed	Interdepartmental coordination on site plan reviews & approvals	Land Use Department Coordination	All Land Use Depts	Jul 1, 2017	On-going	All Land use departments are located near each other. Building permit signoff sheet exists,
4-3 Review site plans for stormwater quality concerns	Completed	Site Plan Reviews	Stormwater quality reviews	P&Z, Environmental Affairs, DPW	Jul 1, 2017	On-going	Plan development proposals requiring Zoning and/or environmental approvals are reviewed for stormwater quality.
4-4 Conduct site inspections	Completed	Site Inspections	Inspections	P&Z, Environmental Affairs, DPW	Jul 1, 2017	On-going	Environmental Affairs conducted inspections as part of Building Permit Process
4-5 Implement procedure to allow public comment on site development	Completed	Public Meetings and Hearings	Public Comment	P&Z, Environmental Affairs, Land Use Commissions	Jul 1, 2017	On-going	Public comments are allowed for P&Z applications and Environmental Affairs applications
4-6 Implement procedure to notify developers about DEEP construction stormwater permit	Pending	As part of plan review process – any potential DEEP permit shall be included in the plan review letter.	SW Permits for relevant projects	P&Z, Environmental Affairs	Jul 1, 2017	On-going	

4.2 Describe any Construction Site Runoff Control activities planned for the next year, if applicable.

^{1.} Continue to enforce existing regulations.

^{2.}Continue to utilize the SeeClickFix system to track citizen reports

- 3.Map storm system into GIS layers
- 4.Indentify interconnected MS4's
- 5. Continue notification to applicants of their potential obligation to register for the Construction General Permit
- 6. Continue to Integrate stormwater compliance requirements into review process for the Connecticut General Permit.

5. Post-construction Stormwater Management (Section 6(a)(5) / page 27)

ВМР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
5-1 Establish and/or update legal authority and guidelines regarding LID and runoff reduction in site development planning	On-going	Evaluate existing ordinances. Enforcement of existing land use regulations	As stated	P&Z, Environmental Affair, Engineering Department	Jul 1, 2022	On-going	
5-2 Enforce LID/runoff reduction requirements for development and redevelopment projects	On-going	Enforcement of existing land use regulations	Enforce LID & stormwater reduction regs	P&Z, Environmental Affairs, Engineering Dept.	Jul 1, 2022	On-going	Stormwater maintenance program is filed on the land records as part of Environmental Affairs and Planning/Zoning applications.
5-3 Identify retention and detention ponds in priority areas	On-going	The town will identify known private and public detention ponds	Log Town SW Measures	DPW	Jul 1, 2022	On going	
5-4 Implement long-term maintenance plan for stormwater basins and treatment structures	Completed	Planning & Zoning regulation require owners to maintain their detention systems. Maintenance plan is filed on the Land Records	O&M Plan for Town SW measures	DPW, Other Land Use Depts	Jul 1, 2022	Ongoing	
5-5 DCIA mapping	Complete	The Town utilized the state's DCIA mapping to determine the DCIA baseline.	Map DCIA	DPW	Jul 1, 2020	March 3, 2020	Refer to appendix 1 — attached.
5-6 Address post-construction issues in areas with pollutants of concern	On-going	Identify Erosion & sediment problems. Develop short- and long-term solutions.	As stated	DPW, Other Land Use Depts	Not specified	On-going	

5-7 Turf reductions	On-going	The town's wetlands regulations required applicants to preserve as much as the natural buffer as possible	As stated	DPW, Other Land Use Depts	Jul 1, 2018	Ongoing
5-8 Require consistency with the 2004 Connecticut Stormwater Quality Manual	On-going	Through the P&Z process, drainage requirements are indicated	As stated	DPW, Other Land Use Depts	Jul 1, 2018	On-going
5-9 Coordination with Local Health Department	On-going	The local Health Department is included on application reviews as warranted	Continue activity.	DPW, Other Land Use Depts	Jul 1, 2018	On-going

5.2 Describe any Post-Construction Stormwater Management activities planned for the next year, if applicable.

- 1. Identify Public and Private retention/detention ponds in priority areas
- 2. Calculate DCIA for outfalls.
- 3. Address post-construction sediment and erosion control issues as they occur.
- 4. Continue to encourage preservation and enhancement of natural buffers.
- 5. Continue to require consistency with the 2004 Stormwater Quality Manual.
- ${\it 6. Continue to coordinate application reviews with the local Health Department.}$

5.3 Post-Construction Stormwater Management reporting metrics

Metrics	
Baseline (2012) Directly Connected Impervious Area (DCIA)	609.47 Acres (see appendix 1)
DCIA disconnected (redevelopment plus retrofits)	2.36 acres in 2023 /TBD acres total (refer to below in section 5.4))
Retrofits completed	<i>0 in 2023</i> by town, several completed by private development (see Appendix 1) (refer to section 5.4)
DCIA disconnected	TBD this year /TBD % total since 2012 (TBD) (Refer to section 5.4)
Estimated cost of retrofits	TBD Unavailable –
Detention or retention ponds identified	Refer to below# this year /# total (TBD) (Refer to section 5.4)

5.4 Briefly describe the method to be used to determine baseline DCIA.

The Town utilized the CTDEEP impervious coverage layer. The Town went through each of the basin areas, then adjusted the DCIA by categorizing the areas and calculated the adjusted DCIA areas.

There were many retrofit projects since 2012 in Wilton Ct. These retrofits were through development of Private property. Residents were required to design additions or new dwelling by not increasing storm runoff onto neighboring properties. These projects and calculations will be determined on an on-going basis. They will be summarized on and on-going basis.

6. Pollution Prevention/Good Housekeeping (Section 6(a)(6) / page 31)

ВМР	Status	Activities in current reporting period	Measurable goal	Department / Person Responsible	Due	Date completed or projected completion date	Additional details
6-1 Develop/implement formal employee training program	Complete	Retained Consultant, prepared SWPPPs	Training	DPW	Jul 1, 2017	On-going	Recent training occurred on September 11, 2019
6-2 Implement MS4 property and operations maintenance	Complete	On-going O & M	O & M	DPW, Parks & Rec, Board of Education	Jul 1, 2018	On-going	Highway Department investigates drainage system as part of the town road program each year. 4 miles of road was investigated in 2023.
6-3 Implement coordination with interconnected MS4s	In Progress		Coordinate with DOT & Adjacent Municipalities	DPW	Not specified	On-going	Continue to review State as-built drawings to investigate interconnect.
6-4 Develop/implement program to control other sources of pollutants to the MS4	In Progress	Develop a list of facilities in Town not required to register under the Industrial Stormwater Permit, and review screening and monitoring results as they become available.	Coordinate with DOT & Adjacent Municipalities, and review registrant list	DPW	Not specified	On-going	

6-5 Evaluate additional measures for discharges to impaired waters*	On-going	Town evaluates drainage system on paving priority roads	Evaluation of measures	DPW	Not specified	On-going	
6-6 Track projects that disconnect DCIA	On-going	The town will begin to track the DCIA coverage.	Track Projects	DPW, P&Z	Jul 1, 2017	On-going	Currently, when Commercial properties are applying for P&Z approval for developments, their retention system is set up to provide disconnection to downstream drainage system (when practical). This information is tracked in form of an as-built drawing – but not calculated. This is on- going. There were many projects completed since 2012
6-7 Implement infrastructure repair/rehab program	Complete	Repair & rehab infrastructure as part of our Roadway paving plan.	Infrastructure Maintenance	DPW, Parks & Rec, Board of Education	Jul 1, 2021	On-going	
6-8 Develop/implement plan to identify/prioritize retrofit projects	On-going	Repair & rehab infrastructure as part of our Roadway paving plan.	Infrastructure Maintenance	DPW, Parks & Rec, Board of Education	Jul 1, 2020	On-going	
6-9 Implement retrofit projects to disconnect 2% of DCIA	In progress	The Town has not identified any opportunities for DCIA disconnections. The Town will continue to look for opportunities on its facilities and with developers.	Disconnect 2% of the Town's DCIA	Town Engineer	Jul 1, 2022	On-going	Currently, when Commercial properties are applying for P&Z approval for developments, their retention system is set up to provide disconnection to downstream drainage system (when practical). This information is tracked in form of an as-built drawing – Many retrofit projects occurred since 2012 - but not calculated.
6-10 Develop/implement street sweeping program	Complete	The Town sweeps its roads as part of sweeping program. A list of roads swept	Street Sweeping	DPW	Jul 1, 2017	On-going	

		in any given year is recorded.					
6-11 Develop/implement catch basin cleaning program	Complete	Catch basins are inspected as part of the paving program and cleaned as needed.	Catch Basin Cleaning	DPW	Jul 1, 2020	On-going	
6-12 Develop/implement snow management practices	Complete	Snow Management policies are in place and are in the process of being updated.	Snow Management	DPW, Parks & Rec, Board of Ed	Jul 1, 2018	On-going	The Town minimizes the use of sand on its roadways.

6.2 Describe any Pollution Prevention/Good Housekeeping activities planned for the next year, if applicable.

- 1. Continue employee training programs
- 2. Continue to institute requirements of the Industrial general Permit SWPPP.
- 3. Identify interconnected MS4s.
- ${\it 4.} \quad {\it Identify potential contributors from General Permit non-registrants}.$
- 5. Continue existing infrastructure repair policies.
- 6. Track DCIA disconnection.
- 7. Perform infrastructure repairs as needed and as funding is available. Highway personnel investigates storm infrastructure on 8 miles of road out of 127 miles total in 2022. Catch basin tops are replaced, cb's are repaired and cleaned as needed.

6.3 Pollution Prevention/ Good Housekeeping reporting metrics

Metrics	
Employee training provided for key staff	9/11/19
Street sweeping	
Curb miles swept	147.2 miles
Volume (or mass) of material collected	Un determined
Catch basin cleaning	

Total catch basins in priority areas	TBD
Total catch basins in MS4	3,174 +/-
Catch basins inspected	376+/- in 2023; 2,046 +/- since July 2017
Catch basins cleaned	297 +/-
Volume (or mass) of material removed from all catch basins	Approx. 60 cy
Volume removed from catch basins to impaired waters (if known)	TBD
Snow management	
Type(s) of deicing material used	NaCl
Total amount of each deicing material applied	1,720 tons +/-
Type(s) of deicing equipment used	Truck-mounted Spreaders
Lane-miles treated	254.5 miles
Snow disposal location	Town Right-of-Way
Staff training provided on application methods & equipment	DPW personnel attended training on 11/30/17 8 12/6/17. New hires attended training in Fall of 2018. Assistant DPW Director and Highway Superintendent attended Zoom class on December 22, 2020.
Lands with high potential to contribute bacteria (dog parks, parks with open water, & sites with failing septic systems)	
Cost of mitigation actions/retrofits	

6.4 Catch basin cleaning program

Briefly describe the method used to optimize your catch basin inspection and cleaning schedule.

Catch basins are cleaned based on numerous factors. 1) Residents can inform the town through SeeClick Fix program. 2) Highway supervisors observe catch basins in the high priority areas and all other areas. 3) Catch basin were cleaned and repaired as part of road prep before paving. The Town has over 3,100 catch basins and one jet-vac truck. The town of Wilton just bought a 2022 jet vac Truck. The existing 1994 Vac-Truck will be sold. The Town has implemented a Collector Application to track catch basin cleaning, dates cleaned, etc. Since the issuance of the current MS4 permit in July 2017, 1690+/- out of 3174 cb's were repaired – each were inspected, new cb tops replaced as needed, loose joints were cemented as needed and cb's were cleaned if debris existed above the outlet invert.

6.5 Retrofit program

Briefly describe the Retrofit Program identification and prioritization process, the projects selected for implementation, the rationale for the selection of those projects and the total DCIA to be disconnected upon completion of each project.

Projects are identified on an as-needed basis, and implemented based upon perceived benefit or potential impact to water quality. Infrastructure located within 4 miles of the Wilton's 127 miles are inspected and repaired in 2023. In 2023, 376 catch basins were inspected, new cb tops replaced as needed, loose joints were cemented as needed and cb's were cleaned if debris existed above the invert. Since the issuance of the current MS4 permit in July 2017, 1690+/-out of 3174 cb's were repaired – each were inspected, new cb tops replaced as needed, loose joints were cemented as needed and cb's were cleaned if debris existed above the outlet invert.

Describe plans for continuing the Retrofit program and how to achieve a goal of 1% DCIA disconnection in future years.

The retrofit program will continue to proceed on an as-needed basis, as funding is made available. The Town is evaluating its properties to identify potential disconnection opportunities, and looks for disconnection opportunities in site plan applications. Currently, when Commercial properties are applying for P&Z approval for developments, their retention system is set up to provide disconnection to downstream drainage system (when practical). This information is tracked in form of an as-built drawing – but not calculated.

Describe plans for continuing the Retrofit program beyond this permit term with the goal to disconnect 1% DCIA annually over the next 5 years.

The Town will continue with its existing process for implementing its own projects, and also for reviewing Town projects and site application as they come in for review to help achieve the DCIA reduction goals. Currently, when Commercial properties are applying for P&Z approval for developments, their retention system is set up to provide disconnection to downstream drainage system (when practical). This information is tracked in form of an as-built drawing – but not calculated.

Part IV: Certification

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement made in this document or its attachments may be punishable as a criminal offense, in accordance with Section 22a-6 of the Connecticut General Statutes, pursuant to Section 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute."

Chief Elected Official or Principal Executive Officer	Document Prepared by
Print name: Toni Boucher (First Selectwoman)	Print name: Frank Smeriglio, P.E. (Director of Public Works/Town Engineer)
Signature / Date:	Signature / Date: