



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



CAROL A. MURRAY, P.E.
Commissioner

JEFF BRILLHART, P.E.
Assistant Commissioner



May 1, 2006

06

*Received
5-4-06*

Ms. Thelma Murphy
US EPA – Region 1
1 Congress Street, Suite 1100
Boston, MA 02114-2023

RE: Submittal of New Hampshire Department Transportation 3rd Annual Report
for the NPDES MS4 Program; EPA Permit Number NHR043001

Dear Ms. Murphy:

Please find enclosed a copy of the Department's 3rd Annual Report covering the period of May 1, 2005 to April 30, 2006, consistent with EPA's MS4 General Permit for Transportation Agencies. Part I of this letter outlines changes and modifications to the Annual Report compared to last year's Report. Part II presents responses to your comments on last year's Annual Report that were included in a letter dated January 27, 2006. Per your request, Part III presents the responses to comments provided by the Conservation Law Foundation (CLF), in their letter directed to the EPA and dated December 17, 2004.

**PART I – THE DEPARTMENT'S PROPOSED CHANGES TO THE ANNUAL REPORT
AND TO STORM WATER MANAGEMENT PLAN**

In effort to simplify and prepare a more concise and workable plan, the Department eliminated all BMPs that were repeated from previous Sections within the Annual Report. It is recognized that there is often overlap with many BMPs listed under the six (6) Minimum Measures; however, the Department now feels there is no added benefit in repeating BMPs and removing the repeated text makes for a more streamlined report. In preparing this 3rd Annual Report, the Department has also moved certain BMPs to other Minimum Measures because the specific BMP goal(s) were more in line with the overall intent of that Minimum Measure. For example, BMP #1C- Employee Training was moved to Minimum Measure Six - Good Housekeeping because this BMP had more to do with Pollution Prevention and Good Housekeeping and less to do with Public Education and Outreach.

Table 1.0 provides a summary of the proposed changes in the Annual Report. Adding clarity and direction were the primary reasons for most of these proposed changes. The revisions also addressed your comments and those given by CLF concerning vague or ambiguous language. As noted in Table 1.0, several BMPs were moved to more appropriate minimum measures, other BMP descriptions and/or goals were revised and other BMPs are proposed for elimination because they are redundant or no longer applicable. The BMPs proposed for elimination are still included in this 3rd Annual Report but will be removed in next year's report following your review and concurrence of these changes.

Table 1.0: Summary of Proposed Changes to the Department's 3rd Annual Report

Proposed BMP Change Description	Rationale
1.0 Public Education and Outreach	
Move BMP #1C – Employee Training to BMP #6F	Does not involve public education
Move BMP #1D - Sponsor a Highway to BMP #2A	Aligns more with Public Participation & Involvement
Move BMP #1E – Guidance Materials to BMP #6G	Similar to BMP #1C, BMP #1E does not involve public education
Consolidate BMP #1F – Public Media Campaign	This BMP had a separate section to Assess Media Options that is no longer relevant. This BMP will no longer have one BMP description.
2.0 Public Participation and Involvement	
Eliminate BMP 2B- Stakeholder Meetings	These internal and agency meetings were relevant during the early stages of developing BMPs and the SWMP but are no longer needed to implement BMPs.
Consolidate BMP 2E – Storm Water Web Site	The Department will utilize its existing web site to post relevant project information and a separate storm water web site will no longer be implemented (See BMP 2E for details).
Eliminate BMP 2F- Community Survey	This survey was intended to gather community mapping information to assist in the Department's mapping effort but is no longer needed now that the Department has initiated its own mapping effort.
3.0 Illicit Discharge Detection and Elimination	
Revise BMPs 3A- Update Current Guidance and 3B – Drainage Mapping	Previous BMP descriptions were vague and offered little direction. Both BMPs were revised to provide greater specificity to the BMP goals.
Revise BMP #3C has been revised with respect to IDDE prioritization	The prioritization for implementing IDDE program will include watersheds of impaired waters as a major factor and will incorporate the MATS system rather than the previously planned PDA RASCAL and IMP programs, which are no longer relevant to the MS4 program.
Eliminate BMP #3D – Conduct Survey of District Personnel for Illicit Discharge Detection and Elimination	Now that an IDDE Manual is being developed – this planned survey of District personnel will no longer be needed as the “main-driver” of the IDDE Program - District personnel will likely be queried on an as needed basis, if questions arise during the IDDE process with respect to their knowledge of drainage conditions in their areas.
Proposed BMP Change Description	Rationale
4.0 Construction Site Runoff Control	
Revise BMP 4A – Erosion and Sedimentation Control Plan Review -	The phrase “erosion and sediment control plans” has been changed to SWPPPs as contractors and the Department now referring to SWPPPs as the primary erosion control plan included in the Department specifications. Also, the second part of 4A –under BMP Description the phrase

	“Educate New the Department Erosion Control Site Monitors” was added where previously no description was provided.
Revise BMP 4B – Routine Roadway Maintenance	This BMP Description was revised to include project- specific review and coordination to the Division of Operations in addition to training. Measurable goal includes reducing the number of complaint -based erosion control issues related to existing drainage infrastructure.
Revise BMP 4D – Meetings with EPA-Region 1 and NHDES	The BMP description has been changed to state; “the Department will meet as necessary” rather than “on an annual basis”, now that the Department is entering the 4 th year of the Small MS4 Program.
Revise BMP 4E- Project Design	The BMP description was revised to reflect that the Departments project review process now evaluates project scheduling, sequencing and phasing as part of the erosion control measures.
Move BMP 4F to be combined with BMP 5B which involves inventory of BMPs	This development of a database in this BMP 4F was geared toward permanent water quality BMPs, which is very similar to BMP 5B.
Eliminate BMP 4H – Develop Public and Private Partnerships	This BMP is redundant with BMP 1G and is not necessary and should be eliminated.
Eliminate BMP 4I- SWPPP Template	This BMP is addressed in BMP 4A, which involves review of project specific SWPPPs and is no longer needed as a separate BMP.
Eliminate BMP 4K–ROW Constraints	The goals of BMP 4K are addressed under BMP 4E –Project Design Review and a separate BMP is no longer needed.
5.0 Post- Construction Runoff Control	
Move BMP 5C- “Review Storm Water BMPs for Proposed Projects” to BMP 5A.	It seemed more logical for BMP 5C involving initial project review of proposed storm water BMPS to be listed first as BMP 5A before the BMPS involving inventory and maintenance discussed below.
Revise BMP 5A –“Routine Maintenance” now becomes BMP 5B; “Develop Inventory of Storm Water BMPs”.	The intent of this BMP has been more clearly defined in terms of developing an inventory of permanent water quality BMPs and a database using MATS to allow maintenance scheduling and prioritization.
Revise BMP 5B – “Routine Maintenance” to become BMP 5C	The intent of this BMP has been redefined as to evaluate with the possibly adoptions a Standard Operating Procedures (SOP) Manual being prepared by the Seacoast Stormwater Coalition. Department personnel are providing input in the development of the manual and it is hoped they will take ownership of the guide when it is complete.
Proposed BMP Change Description	Rationale
Add BMP 5D – Enhance / Replace / Upgrade Eroding Roadway Drainage Culverts	This BMP intends to more formalize and/or streamline the coordination efforts with Lakes Association and other groups in resolving observed erosion problems associated with the Department drainage infrastructure.

6.0 Pollution Prevention / Good Housekeeping	
Eliminate BMP 6A- Environmental Management Systems (EMS- ISO 14001)	The Department believes that the EMS should be handled separately and not be tied directly to the MS4 Program because it involves many other aspects other than storm water. The timeline for full implementation of an EMS may not be in synch with the MS4 permit period.
Revise BMP 6B- Managing Assets for Transportation Systems	The BMP Description is revised to include incorporate field mapping data and drainage infrastructure attributes for MATS systems to allow management of drainage assets.
Eliminate BMP 6E – Water Based Paints	Now that this practice has been implemented and will continue to be used, this BMP can be eliminated since there will be no further changes or actions needed.
Eliminate BMP 6F- No Exposure Certification	The “No Exposure” Certification no longer applies since the Department maintenance shed activities are not covered under the MSGP.
Eliminate BMP 6G – Water Quality BMPs	The goal of this BMP in incorporating permanent storm water quality BMPs in the Department projects is the same as BMPs 5A and 5B and is not needed as a separate measure.

PART II – RESPONSES TO EPA’S COMMENTS ON THE 2ND ANNUAL REPORT

The Department appreciates the positive feedback from EPA regarding its Storm Water Management Program and feels that it has worked diligently to comply with the requirements of the Small MS4 General Permit (No.: NHR0430001) and honor the commitments outlined in its Storm Water Management Plan (SWMP) document, as annually updated in its Small MS4 Annual Reports to EPA.

The following sections of this letter address comments expressed by EPA relative to each of the specific areas in the January 2006 letter. These sections include Outfall Mapping and Identification of Receiving Waters, Public Education, Public Participation, Illicit Discharge Detection and Elimination, Management of Construction Site Runoff, Management of Post Construction Runoff, Pollution Prevention and Good Housekeeping and Additional Requirements.

Public Education

EPA expressed concern about BMP #1F, which discusses development of an appropriate media campaign. The Department has revised and improved this BMP. The term “appropriate” refers to that portion of the general public that uses the Department services, *i.e.* the “traveling public”. To this end, the Department’s Public Information Officer continues to work with various media outlets (radio, television, newspapers) to distribute public information regarding the Department activities. In 2005, over 130 press releases were posted to highlight various Department activities. These include actions related to transportation planning, roadway

improvement projects and the salt brine application process. The Department is also considering other media outreach activities. These may include public service announcements and brochures; however, the Department has reservations about producing paper brochures as often time these materials are discarded alongside the highway by the traveling public. Maintenance personnel routinely pick up brochures, maps and other informational documents that are available at rest areas and information centers. Although distribution of informational materials has its merits and benefits the traveling public, careless discarding of these documents by a minority of highway users does in fact compound the litter problem along the Department roadways and highways.

Regarding your reference to the State of Maine media campaign related to storm water, the Department understands that this effort is largely funded and carried out by the Maine Department of Environmental Protection (ME DEP). The Department feels that the target audience was much different and the activities that MEDEP was trying to modify are not ones the Department should be trying to modify (i.e. not dumping grass clipping down the municipal storm drains). A media campaign directed at the traveling public would fit better in the Department's mission and programs. This not does mean the Department would not commit resources to a MEDEP style campaign. It is just not in a position to spearhead such an effort. The Department is still exploring media outlets and messages that would have the greatest effect on water quality, while staying true to the Department's mission.

Public Participation

EPA comments that "BMP #2C discusses the development of a policy for soliciting input about water quality and storm water issues at public meetings." Currently, the Department tracks the number of public meetings and the number of water quality issues brought to their attention. The Department will continue to document the number of meetings and summarize the content of the meetings. Importantly, the Department also encourages cooperation with regulated communities and whenever feasible implements water quality renovation BMPs even if the local officials do not ask for them. To this end, the Department meets regularly with Regional Storm Water Groups comprised of the various Small MS4 communities. Of particular note, in this 3rd year of the permit term, the Department has coordinated with the Seacoast Stormwater Coalition to initiate the development of an Illicit Discharge Detection and Elimination and Good Housekeeping Standard Operating Procedures manual.

EPA refers to BMP #2C stating that "as appropriate" storm water coordinators will be invited to public meetings. (Consistent with the Annual Report, the BMP number that is quoted by EPA is actually BMP #2D.) EPA asked for better articulation of this policy and this BMP has been revised. The term "appropriate" refers to sending of letters to coordinators in the city/town where the project is located. Currently, the Department sends out an informational project letter to all local officials including storm water coordinators in the municipality where the project is located. This letter requests specific comments from local officials on the project with regard to concerns about storm water. In addition to the initial contact letter, the Department sends a specific public meeting invitation to the Stormwater Coordinator. This letter draws attention to the fact that it is much easier for the Department to add requested storm water renovation structures early in the design process and allows the coordinator to get an in-depth review of the

project from the entire design team. So, as a matter of due course, the Department actively engages public participation in the review of all of its projects, not only within Small MS4 communities, but statewide. Concerns and comments from local officials, as well as state and federal agencies, are acknowledged and reflected in project designs.

EPA refers to BMP #2D as discussing the possible development of a website, with a measurable goal to document the number of meetings held and the number of websites reviewed. (Consistent with the Annual Report, the BMP number that is quoted by EPA is actually BMP #2E, not BMP #2D.) EPA suggests a more proactive goal of developing a storm water website by the end of the permit term. At this time, the Department does not feel that creating a separate external website is feasible (or even practical), since so many similarly themed sites abound. The Department feels that adding another website would likely provide redundant information to that already provided by NHDES and EPA websites. For some larger, multi-year projects, e.g. I-93 and Spaulding Turnpike, separate project specific websites have been developed to provide public access to various environmental documents and studies. The Department is currently considering developing an intranet site primarily for the use of the Department staff. As currently envisioned, this website will have important storm water documents and NPDES Phase II resources. It will also provide interagency links to storm water websites (including to EPA Region 1 and NHDES). The Department feels that this is an important effort, which will likely be expanded upon as time allows.

Illicit Discharge Detection and Elimination

Regarding BMP #3B, EPA suggests that the Department “develop a more aggressive mapping strategy with the overall goal of identification of all outfalls in the Department’s system.” A much more aggressive mapping effort has taken place since September 2005 as noted in BMP #3C in the attached annual report.

Further, EPA suggests that “the measurable goal of documenting which communities have completed mapping does not appear to be relevant to the Department’s program. This measurable goal should be modified to be more relevant to the Department.” The Department concurs and has removed this measurable goal from BMP #3B.

Regarding BMP #3C – Illicit Detection and Elimination Program, EPA requests that the Department more clearly define its measurable goal and suggests several sources for existing IDDE manuals. Again, the Department has made progress in this area. Currently, the Department participates in the Seacoast Stormwater Coalition (SSC) that includes many coastal and southeastern New Hampshire communities located in the Department’s Districts 5 and 6. The SSC has retained a consultant to develop an IDDE guidance manual. The SSC has agreed to share this manual with the Department, which will then modify and adopt it for its use, as appropriate, by District 5, District 6, and Bureau of Turnpikes maintenance employees.

Additionally, regarding identifying illicit discharges to its Small MS4s, the Department identified three such connections during fall of 2005 mapping efforts. In one case, the Department notified the property owner and NHDES that it observed possible illicit discharges from its Small MS4 and asked the owners to investigate and rectify the situation. The

Department also requested that NHDES follow-up on observed illicit connections. Neither turned out to be illicit, but good coordination channels between the Department and NHDES were established. In the summer of 2006, the Department is hiring an intern to conduct reconnaissance in areas where the Department is discharging storm water into 303(d) impaired waters. The intern will observe and/or test dry weather flows from the Department's storm drains based on documented impairments. Similar observations (visual/smell) are being recorded during ongoing mapping efforts.

Regarding identifying priority areas for mapping, the Department has identified its highways located within the Small MS4 communities in District 5, District 6 and Turnpikes where impaired waters, public beaches, water supplies, etc are located as priority areas for its IDDE program. As mentioned previously, the Department has identified the listed impaired water bodies and waterways associated or adjacent to their maintained roadways in Appendix A. Additionally, the communities in which the Interstate 93 widening project will occur are also considered priority areas for mapping due to an impending chloride TMDL Study. This mapping will also be of value to the Beaver Lake Watershed Partners.

With regard to BMP #3D, EPA suggests that the Department "include more proactive measures and not use ambiguous terms". The Department concurs and proposes to eliminate BMP #3D as a principal measure of the IDDE Program (See Table 1.0 above and Annual Report).

The phrase "issue of concern" refers to the types of illicit discharges identified by the Department maintenance personnel during the course of their IDDE investigations. The Department anticipates that there will be different procedures for different types of illicit connections that are discovered. For example some of the illicit discharges could represent an immediate hazard, such as fuel, oil, or chemical discharges and would require immediate notification of NHDES about the spill for response and remediation. Other types of illicit discharges, such as an illegally connected basement sump pump to a Department storm drain system will require working with the property owner to eliminate the suspected illicit hook-up. In this latter case the illicit connection may not represent an immediate threat to human health and the environment, but does represent an opportunity for education and outreach with the public.

Management of Construction Site Runoff

With respect to BMP #4A, EPA suggests that a measurable goal be "to track performance of erosion and sediment control plan designers"...and "describe how this information will be used." The Department has taken several steps to strengthen the erosion control review process. First, three Environmental Coordinators that have been involved in erosion control plan review have been transferred into the Bureau of Environment. The BOE is currently in the process to hire a fourth person to expand coverage and increase turn around time. The Department has adopted a more formal process and a detailed checklist to review SWPPPs prepared by contractors to insure that all of the required information is contained in the document. The Department does keep track of the performance of the SWPPP designers, which is used to prioritize review time and focus additional attention to habitually poor performers. The

Department has been coordinating with NHDES in the development of proposed rule changes and increased requirements under the Site Alteration program, which is setting new standards for erosion and sedimentation control in the State of New Hampshire.

Under BMP #4B, EPA indicates that “it is unclear as to why training is limited to one document.” (Consistent with the Annual Report, the BMP number that is quoted by EPA is actually BMP #4C, not BMP #4B.) In fact, more than one manual is used for training employees on storm water management and erosion and sediment control. The Department has updated its “Construction Manual” which is the general guidebook related to all Department construction activities, including erosion and sediment control. The Department has also updated the manual “Department Guidelines for Temporary Erosion and Sediment Control and Stormwater Management”. Both documents are now consistent with the Construction General Permit.

Regarding BMP #4I, EPA comments that the “Department should identify a specific time period for completion of a SWPPP template.” As presented in Table 1.0 above and attached Annual Report, the Department is proposing to eliminate BMP #4I from its program. The Department evaluated the merits of providing a standardized SWPPP template for use by contractors on its projects and found that available templates were costly, overly complicated, or impractical to use as a “one size fits all.” It determined that it was more useful to review each SWPPP on its own merits by verifying compliance with the CGP. To this end, the BOE Environmental Coordinators continue to review and evaluate contractor SWPPPs on all projects statewide, providing feedback directly to contractors when revisions/modifications are necessary.

Management of Post Construction Runoff

Under BMP #5B, EPA suggests that the Department consider using an existing manual rather than creating a new one. As presented in Table 1.0 above and attached Annual Report, the Department has reordered the BMPs in this Minimum Measure so that one logically follows the other. To this end, BMP #5B is now BMP #5C. The Department has completed development of an internal guidance document entitled “BMPs for Routine Maintenance Activities” to be used by all Maintenance Districts and Operations Bureaus as a reference tool in performing roadside maintenance activities. As pointed out in BMP #3C, the Department is also coordinating closely with the Seacoast Stormwater Coalition in developing a manual for roadway maintenance activities, including IDDE procedures. Once complete, the Department will be adapting and adopting this manual in an effort to provide uniform guidance that is compliant with NPDES Phase II Regulations.

EPA also indicates that the Department needs to better define how the Department will measure improvements in water quality. Of particular note, the Department has strengthened this Minimum Measure by adding BMP #5D – Enhance/Replace/Upgrade Roadway and Drainage Culverts to Rectify Observed Sediment and other Pollutant Source Areas. This BMP relies on close coordination with existing watershed groups, lake associations, etc. to address storm water management issues in environmentally sensitive areas. With additional staffing resources, the Department is now addressing all complaint-based or other known pollutant source issues related to the Department drainage infrastructure in a timely manner, to the satisfaction of the aforementioned stakeholders. This is an example of how the Department

strives to improve water quality through coordinated action. Additionally, the Department is now utilizing the Managing Assets for Transportation Systems (MATS) to track activities related to storm water system maintenance activities, e.g. catch basin or culvert cleaning, vegetation clearing in storm water basins, etc. In this way, the Department can closely track its efforts related to improving water quality. Finally, proposed changes to the Site Alteration rules and 401 Water Quality Certification requirements requiring specific pollutant loading calculations will invariably and positively effect storm water BMP designs for new projects.

Pollution Prevention and Good Housekeeping

Under BMP #6A, EPA indicates that “the measurable goal associated with this BMP does not appear relevant to the BMP.” Further, “the measurable goal should be implementation of an EMS within the Department by a specific date.” The Department is proposing to eliminate this BMP as they feel that the EMS should be developed separately and not tied to the Small MS4 permit as it is too complex and encompasses many other aspects and programmatic issues aside from storm water. The Department will, as a matter of practice, continue to identify measures to improve water quality and minimize impacts to water resources as described in other BMPs in this Annual Report.

Regarding BMP #6C, EPA states that, “the measurable goal for this BMP should be more proactive.” Further, “the Department may want to set a specific goal for the amount of roadside litter removed,” and “document any reductions in litter collected.” The Department feels that it is nearly impossible to calculate the amount of litter collected along its roadways and highways due to the nature of the materials, methods for collection and removal, and effort needed to calculate the quantities of these discarded materials versus the value of the data collected to the Department. The Department will continue to collect roadside trash and debris during regular maintenance crew routes, because of specific complaints from the public, and in association with volunteer groups, to a level of roadside cleanliness that is acceptable to the traveling public.

Under BMP #6D, EPA asks that the Department clarify its role in the Coastal Cleanup program as ambiguous language occurs in the BMP description, goal, and progress. The Department has reworded the description, goals, and progress of this BMP to provide clarification.

Regarding BMP #6E, EPA requests that “the measurable goal associated with this BMP needs to be clarified to demonstrate the relevance to the described BMP.” The Department agrees that this measurable goal provides little in terms of relevance to its storm water program. This BMP was instituted several years ago as part of the EMS program that the Department was developing. Although the Department will continue to use water-based paints for pavement marking, it does not see the merit of collecting and reporting for the purpose of the Small MS4 Annual Report. Therefore, as presented in Table 1.0 above and attached Annual Report, the Department is proposing to eliminate this BMP.

Under BMP #6G, EPA asks that the Department provide clarification on the terminology used under this BMP. The goal of this BMP, which is essentially incorporating permanent storm water quality BMPs in the Department projects is the same as BMP #5A and #5B and is not

needed as a separate measure. Therefore, as presented in Table 1.0 above and attached Annual Report, the Department is proposing to eliminate this BMP.

Additional Requirements

Under this section of the letter, EPA comments, “Opportunities for ground water recharge and infiltration should be considered in the implementation of all minimum control measures. The Department should highlight areas where this is occurring.” Currently, the Department utilizes several storm water management and erosion and sedimentation control manuals in designing measures for its construction projects and maintenance activities. These manuals include “NHDOT Guidelines For Temporary Erosion and Sediment Control and Stormwater Management”, “Best Management Practices for Routine Roadway Maintenance Activities in New Hampshire”, “Best Management Practices for Urban Stormwater Runoff”, and “Stormwater Management and Erosion and Sediment Control Handbook for Urban and Developing Areas in New Hampshire.” The Department is also actively involved on the Rules Advisory Committee as part of NHDES’ process to draft new Alteration of Terrain (Site Specific) rules. Regarding infiltration, new standards are being created to require a specified amount of groundwater recharge to be achieved with new projects. The Department will coordinate with NHDES as these proposed rules become finalized to develop new design guidelines for BMPs to meet the infiltration requirements. NHDOT continually reviews its practices and procedures to be certain that they meet Federal and State regulations. Erosion and sedimentation control BMPs are designed and implemented using the best and most currently available information.

EPA also comments, “As Total Maximum Daily Loads (TMDLs) are being developed, the Department needs to be proactive in areas where a TMDL applies and implement BMPs necessary to implement the terms of the TMDL”. The Department is starting reconnaissance level investigations at outfalls on 303(d) listed waters, which will include areas where there are completed TMDL studies. If the Department identifies outfalls that are contributing the impairment, it will take action to correct the problem through our IDDE program.

PART III – RESPONSES TO COMMENTS SUBMITTED BY THE CONSERVATION LAW FOUNDATION (CLF)

NOTE: The responses below address CLF’s comments that pertain to the Department’s NOI submittal, which are contained in Parts III and IV of their letter, starting on page 7 and ending on page 13, as listed below.

Comment: *III. The Department’s NOI Fails to Address, as a Threshold Matter, Whether Its Small-MS4 Discharges are Eligible For Coverage Under the MS4 General Permit.*

A. The General Permit Does Not Cover Discharges that Cause or Contribute to Instream Exceedance of Water Quality Standards.

Response: The Department has recently completed a list of receiving water bodies along the Department’s maintained roadways within the identified urbanized areas in New Hampshire and is included in Appendix A of the enclosed 3rd Annual Report. This list also indicates whether the

water bodies are listed as impaired on the 2004 303(d) list. The Department has made substantial progress in mapping its outfalls in these designated areas to comply with the minimum measures of the general permit. CLF's comment implied that a permittee should have had sufficient knowledge (i.e., a complete inventory and characterization of their storm water discharges and their effect on receiving waters) prior to the NOI submittal to insure full compliance of the minimum measures of the general permit. EPA has recognized that this is impractical and unreasonable to expect Small MS4 operators to have detailed knowledge and inventory of their discharge outfalls prior to the NOI submittal and that compliance with the MS4 General Permit requirements will involve an iterative process over the life of the permitting period to achieve full compliance with the permit provisions.

CLF suggests that the findings of the extensive water quality sampling conducted, as part of the proposed I-93 widening environmental review process, should have (1) been included in the NOI submittal and (2) should preclude the Department from being covered under the small MS4 General Permit. First, nearly all of the sampling data related to the I-93 project was collected and continues to be collected well after the NOI was submitted. Second, it seems highly disingenuous for EPA to deny general permit coverage because the Department conducted extensive water quality sampling in numerous streams and rivers when sampling is not explicitly required as part of the general permit. Moreover, even though this sampling has revealed that chloride concentrations in several streams have, on occasion, exceeded the NHDES water quality standards for chloride, the data also clearly indicates that these elevated chloride concentrations are primarily due to other sources in the watershed and not discharges from the I-93 roadway. This is most evident in reviewing upstream and downstream data in Policy Brook, Dinsmore Brook and Beaver Brook. In Policy Brook and Dinsmore Brook, in particular, the chloride concentrations upstream of the I-93 roadway are averaging approximately 25 to 30 % higher than the concentrations recorded downstream of the roadway. Given this situation, it would seem selective and unfair to deny the Department general permit coverage when discharges other than the Department's are the primary source of the problem.

It is also important to point out, that the discovery and information gained from this extensive sampling in the various streams is due in large part to the Department's participation and funding assistance in the sample collection efforts during this time period. It would be highly counterproductive to penalize an MS4 operator for conducting baseline water quality sampling, even if the results show that the MS4 discharges were having a negative impact. This is particularly true when the MS4 operator demonstrates, as the Department has, a willingness to work towards rectifying the problem through coordinating with the resource agencies. Denying coverage under the General Permit, as CLF suggests, would set a poor precedent and be a major disincentive for all MS4 permittees to conduct baseline sampling in receiving waters.

The Department has been working with NHDES and USEPA to address these water quality issues associated with elevated chloride levels through funding and participation in additional studies to identify chloride sources and to assist in the development of Total Maximum Daily Load (TMDL) allocations in the impaired streams. The Department has also already made a substantial investment (over \$450,000) in purchasing new tanker trucks, storage tanks and associated equipment to utilize salt brine as means of reducing the amount of chloride applied in the initial deicing application by as much as 40%, which represents a substantial

improvement. The Department is continuing to evaluate its snow and ice control program and investigate other measures to reduce chloride contributions from its deicing practices.

Since it is not an explicit requirement of the general permit, most MS4 operators are not likely to initiate water quality sampling of receiving waters, but there would be an even greater disincentive if EPA was to set a precedent of denying general permit coverage for those MS4 operators who may have or are considering sampling their receiving waters to assess existing water quality conditions.

Comment: *III.B. The General Permit Does Not Cover Discharges Not in Compliance with the New Hampshire's Anti-degradation Policy*

Response: As mentioned above, the Department regularly coordinates with NHDES as part of the environmental review process on a number of roadway improvements projects throughout the State. Most recently, a Draft 401 Water Quality Certificate has been prepared and momentarily will be released by NHDES regarding the proposed I-93 Roadway Improvement Project from Manchester to Salem. As part this review and/or previous NHDES coordination, the Department has not been informed or made aware of any discharges that are not in compliance with New Hampshire's Anti-Degradation Policy.

Comment: *III. C. The General Permit Does Not Cover Discharges with Direct or Indirect Adverse Impacts on Essential Fish Habitat.*

Response: The Department has consulted with and has provided Essential Fish Habitat Assessments to the National Marine Fisheries Service on a project by project basis, where necessary. To date, the NMFS has concurred with the findings of recent EFH assessments that storm water discharges related to the Department roadways will not result in substantial adverse impacts to Essential Fish Habitat. The Department will continue to consult and provide the necessary information to NMFS as new projects are proposed and may discharge to waters designated as having EFH. Thus, the Department disagrees with CLF's assertion that the Department's discharges are not eligible for General permit coverage.

Comment: *IV. The Department's NOI Fails to comply with Applicable Requirements that Small-MS4 Stormwater Management Programs Control the Discharge of Pollutants of Concern, ensure No Instream Exceedance of Water Quality Standards, Reduce Stormwater Pollution to the extent Practicable, and Protect Water Quality.*

IV. A. The NOI Fails to Address Water Quality-Impaired Waters and Controls for Pollutants of Concern.

Response: As discussed above, the Department has been working closely with NHDES and USEPA on addressing impaired waters particularly with respect to the recently listed chloride impaired waters (i.e., 2004 303(d) list) in southern New Hampshire. Even though the data suggests that sources other than the Department are major contributors to the problem, the Department has already made substantial investments in equipment upgrades and purchasing equipment to use brine instead of rock salt as a means of reducing their salt use. The Department will continue to work with NHDES in developing a Total Maximum Daily Load (TMDL) for

each of the impaired streams and continues to investigate ways to reduce salt use along the I-93 corridor as well as other areas in the state.

Based on the EPA Phase II MS4 guidance documents, it was the Department's understanding that the NOI Form submittal was to provide preliminary information about the various measures that the Department would employ to meet the requirements of the minimum measures. The NOI was not intended to be the final word on the various measures that might be utilized. As new technologies or measures are discovered, these measures could be added into the array of proposed BMPs to meet the requirements. It seems unreasonable to deny general permit coverage, as CLF suggests, because the Department didn't include measures in the NOI when it was submitted, prior to having sufficient water quality data or having an understanding of the full extent of the issue. Subsequent to the NOI submittal and after further study, the Department has initiated various steps to control pollutants of concern, which have been previously mentioned and discussed in the Annual Reports.

Comment: *IV. A. The Stormwater Management Plan's BMPs and Measurable Goals are Vague and Inadequate.*

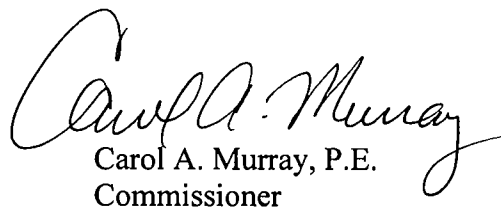
Response: In preparing the 3rd Annual Report, included in this submittal, the Department has undergone an extensive review of the various BMPs and measurable goals. Nearly all of the BMP descriptions and measurable goals have been updated and revised to provide more clarity and direction as to the activities that should be accomplished, based on the Department's improved understanding of the program's goals. These BMP revisions and updates will be incorporated into the Storm Water Management Plan (SWMP) following EPA's review and concurrence of the changes. With respect to CLF's specific comments on the measurable goals for BMPs 1A, 1D, 1F, 6G and GH, the Department has revised the measurable goals for all these BMPs and others as well, and these revisions are included in the 3rd Annual Report.

With respect to CLF's comments concerning construction-related problems near various lakes, the Department has made a renewed commitment to addressing erosion control issues by transferring three Environmental Coordinators from the Construction Bureau into the Bureau of Environment to provide a broader review and coverage of the Department's erosion control related activities across the various Divisions or Bureaus. Previously, the internal erosion control specialists did not review roadway maintenance or repaving type projects when they were part of the Construction Bureau. The Department Bureau of Environment is also in the process of hiring additional personnel to assist in the implementation of the Storm Water Pollution Prevention Plans. The Department has recently worked with NHDES on several projects involving roadway improvements adjacent to lakes to control and monitor erosion control issues. Recent examples include reconstruction projects along Webster Lake and along Lake Mascoma. On these projects, the Department and NHDES worked together to successfully implement measures to prevent any downstream turbidity problems in the lakes during the construction period. The protocols and knowledge gained on these projects will be used on other similar projects to prevent and minimize future erosion control problems.

The Department appreciated EPA's comments on the 2nd annual report and has responded them to the best of our ability. We welcome any future comments on this annual report and will make an effort to implement any suggestions prior to next year's report. Protecting the

environment is not only a goal of the Department; it is part of our mission. We hope the enclosed document clearly expresses our commitment to clean water in New Hampshire.

Sincerely,

A handwritten signature in black ink, reading "Carol A. Murray". The signature is fluid and cursive, with a large initial "C" and "M".

Carol A. Murray, P.E.
Commissioner

s:\npdes\municipal small separated stormwater system permit\2006 small ms4 annual report\cover.doc



NPDES Phase II - Small MS4 General Permit Annual Report

Organization: NH Department of Transportation (NHDOT)

EPA NPDES Permit Number: NHR043001

NHDOT Transmittal Number: N/A

**Annual Report Number
and Reporting Period:** No. 3: May 1, 2005 to April 30, 2006

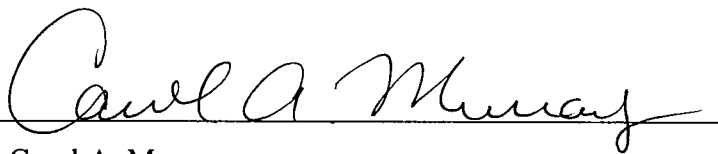
NPDES Phase II MS4 General Permit Annual Report

Part I. General Information

Contact Person: Mark Hemmerlein Title: Water Quality Program Manager
Telephone # (603) 271-1550 Email: mhemmerlein@dot.state.nh.us

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: 

Printed Name: Carol A. Murray

Title: Commissioner, New Hampshire Department of Transportation

Date: May 1, 2006

Part II. Self Assessment

The New Hampshire Department of Transportation (NHDOT) is committed to develop, implement and enforce a program to reduce the discharge of pollutants from the Department's regulated Small MS4s to the maximum extent practicable, with the goals of protecting water quality and satisfying the water quality requirements of the Clean Water Act and state water quality standards while providing a safe and efficient transportation system for the public.

During this third year of the permit, NHDOT focused its efforts in two principal areas including (1) initiating the drainage inventory and infrastructure mapping effort along state-maintained roadways in the MS4 communities (Min. Measure 3); (2) strengthening its erosion control project review and contractor oversight program (Min Measure 4). Relative to mapping, NHDOT began mapping in earnest in September 2005 following receipt of a NOAA Coastal Zone Restoration grant and began focusing on roadways in the Seacoast communities. Drainage structures are mapped in the field with assistance from the District Maintenance personnel using GPS equipment. Basic structure attributes were recorded including structure type (i.e., catch basin, outfall, embankment chute, etc.) as well as size, material type and condition, and whether there are potential problem areas that require further review. The mapping efforts were suspended during the winter months of December, January and February and resumed in March 2006. To date, the drainage infrastructure along approximately 75 miles or roughly 11 % of the estimated 670 state maintained miles in the urbanized areas has been mapped. In the coming months, NHDOT plans to add two more mapping crews and purchase additional GPS equipment, with the goal of having at least 33% of the roadway drainage system mapped by the end of 2006. NHDOT is focusing its efforts on roadways in watersheds of impaired water bodies listed on the 303(d) list including the Cocheco River in the Seacoast area and Beaver Brook in the Manchester-Nashua urbanized area. NHDOT has also developed a list of water bodies that receive runoff from state-maintained roadways in urbanized areas. This list included in Appendix A of the Annual Report.

With regard to erosion control efforts, NHDOT has transferred three Environmental Coordinators dealing with construction site compliance from the Construction Bureau to the Bureau of Environment to coordinate more closely with the BOE storm water program coordinator and other environmental project managers. This also allows the BOE to address erosion control issues that involve other NHDOT bureaus aside from just the Construction Bureau. NHDOT has completed an update of its "Construction BMP" Manual that provides guidance on proper erosion control measures for contractors. NHDOT has stepped up its review of construction SWPPPs prepared by contractors and has developed a checklist of the necessary information that is required within a SWPPP. NHDOT is in the process of hiring a fourth Environmental Coordinator to assist in the implementing the storm water program measures and assisting the erosion control specialists. NHDOT has also participated in NHDES' Rule Advisory Committee for proposed regulation changes as part of the Alteration of Terrain Program, which addresses both erosion control and post-construction storm water treatment requirements.

NPDES Phase II - Small MS4 General Permit Annual Report

In addition, NHDOT has expanded its employee training program as part of Minimum Measure 6 (formerly Min. Measure 1C). The Department feels that employee training provides the necessary "knowledge infrastructure" for pollution prevention as well as the other five measures (Minimum Measures 1-5). NHDOT hosted its annual "Construction School" for employee training on January 26, 2006, where the interactive game show "Jeopardy" was simulated. Contract administrators and administrative staff competed against design engineers to test their knowledge of the NPDES General Permit requirements. NHDOT instituted a new internal Snow and Ice Control training workshop in April 2006 for Highway Maintenance personnel.

NHDOT has also strived to increase its public education and outreach efforts through additional press releases, public notices and additional posting of information on its web site. NHDOT prepared 133 press releases in 2005 at an average of about 11 releases per month, covering a wide range of topics from snow and ice control to project specific details. NHDOT has also increased its effort to get public input in planning phases of specific projects and the more regional transportation planning aspects through public meetings (Min Measure #2). In 2005, NHDOT held 20 public hearings related to the proposed 10-year Transportation Plan and another 25 public meetings related to various roadway projects.

The NHDOT has completed this self-assessment and has determined that our agency is in general compliance with all permit conditions and continues to work toward completing measurable goals set out initially in the NOI.

NPDES Phase II - Small MS4 General Permit Annual Report

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
CURRENT PROGRAMS					
1A	Nonpoint Source Storm Water Display Showcase the NHDOT Nonpoint Source Storm Water Table at 6 NH State Fairs annually, and other appropriate locations (e.g. schools)	Bureau of Highway Maintenance and Bureau of Environment	Note the approximate number of individuals that attended the NHDOT booth, specifically the storm water table.	In this 3 rd permit year, the Storm Water / NPS presentation table was displayed at the major New Hampshire State Fairs, highlighting water resource protection and other natural resources through the state. Following receipt of funds from the State Planning and Research (SPR) program in 2004, the storm water table is being improved and upgraded to illustrate various NHDOT activities related to bridges, roadways, sand and salt operations, patrol sheds, and active construction sites.	NHDOT is anticipated to have the improved storm water table ready next year to be used for its public presentations at the state fairs and other various groups, local schools, and other appropriate audiences that are identified.
	Review current performance questionnaire and update appropriately to solicit public opinion on storm water issues. Distribute at State Fairs.	Bureau of Environment	Summarize the responses and track the number of responses received.	A questionnaire was distributed at the storm water table displays to collect public feedback on areas for improvement.	During the 4 th year, NHDOT plans to update the performance questionnaire.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
1B	Meetings and Presentations with Professional, Private, and Public Organizations NHDOT will continue providing appropriate presentations to both public and private organizations relative to storm water issues and the NPDES Phase II program. NHDOT will attend appropriate presentations/workshops.	Bureau of Environment	NHDOT will prepare a conference report of the individual presentations/meetings and will summarize the findings to EPA in the annual report. A total number of presentations/meetings and the target audience within the reporting year will be documented.	In addition to sharing ideas about public education efforts at the Regional Storm Water Group meetings, NHDOT Bureau of Environment personnel attended the NPS / Storm Water Public Education Conference held in Chicago on Sept.27-30, 2005. Recently, NHDOT has teamed with ACEC-NH to host a Technical Transfer Conference on April 13, 2006 in Concord, NH. NHDOT is currently working with NHDES to hold a Storm Water workshop on May 9, 2006 to discuss on storm water issues and regulations within the state.	Continue to provide or assist in hosting or supporting presentations to both public and private organizations.
	NHDOT will continue meeting with the surrounding New England states to coordinate programs and share information.	Bureau of Environment	Meet at least annually. NHDOT will prepare a conference report of the individual meetings summarizing the topics discussed, materials distributed and follow-up on action items noted.	NHDOT Environmental personnel met with other New England Transportation Agency environmental staff at the Northeast Transportation Mitigation Workshop held on Oct. 25, 2005 down in Worcester, MA. This workshop provides an opportunity to collaborate on common issues regarding	Continue meeting and coordinating with other New England State Agencies to share information and efforts relative to storm water issues.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				storm water and other environmental matters. NHDOT will host the next meeting on 05-06-06.	
1C	Provide NHDOT employees training on storm water related issues and the NPDES Phase II program				
	This BMP has been moved to BMP #6F as it pertains to internal employee training and not public education and outreach.				
1D	Sponsor A Highway				
	This BMP has been moved to BMP #2A since it deals directly with public participation and involvement.				
1E	Guidance Materials				
	This BMP has been moved to BMP #6G as it pertains to internal guidance document for NHDOT employees and not public education and outreach.				

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
1F	Develop Appropriate Media Campaign Increase public education and outreach efforts through additional public announcements and information sharing using the available media options including the NHDOT web site. NOTE: This BMP has been revised and improved.	Commissioner's Office: Bureau of Environment	NHDOT will focus on informing the traveling public on DOT activities through press releases, media contacts and public meetings	NHDOT's Public Information Officer continues to work with various NH media outlets i.e., NHPR, WMUR (channel 9) and state newspapers to distribute public information regarding NHDOT's activities. In 2005, over 130 press releases were posted to highlight or provide notice on various activities including transportation planning, proposed roadway improvements and the salt brine application process. NHDOT has posted additional information and environmental documents on their primary web site. (See BMP #2E as well).	NHDOT will continue evaluate opportunities to educate the public on NHDOT activities particularly on pollution prevention actions. The NHDOT Public Information Officer will continue to coordinate with the various media outlets to share future press releases.
1G	Coordinate/ Collaborate with Other MS4 Communities within the State Attend and participate in meetings with other regulated communities. .	Bureau of Environment	Document the number of meetings held and/or organizations attending.	NHDOT continues to meet with four NH Regional Community-Based Storm Water Groups on a quarterly basis or as meetings are held. This allows for various MS4 representatives to share ideas and coordinate on mutual efforts.	Continue meeting with the three (3) NH Regional Storm Water Groups to share information, discuss common issues of concern, and work toward mutually beneficial solutions.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				Last years' meeting dates and groups include: Southeast Regional Storm Water Group (currently merging with Nashua-Area Storm Water Group): June 10, 2005 Manchester-Area Storm Water Group): May 15, 2005 August 2, 2005 November 7, 2005 November 15, 2005 February 15, 2006 Nashua-Area Storm Water Coalition: August 17, 2005 March 15, 2006 Seacoast Storm Water Coalition: September 8, 2005 November 3, 2005 December 8, 2005	
	Encourage and facilitate development of mutually beneficial partnerships. <i>Please note change in wording since original NOI submission.</i>	Bureau of Environment	Document the partnerships that are formed.	In addition to helping to formulate the Statewide NH Regional Storm Water Groups listed above, NHDOT has been actively pursuing and formulating other important partnerships with such groups as the NH Association of General Contractors, the UNH T2 group and the NH Chapter of the American Council of Engineering Companies	NHDOT will continue to support the efforts of the statewide storm water group and AGC. It is anticipated that other partnerships will be formed, and existing ones will be strengthened through these collaborative efforts.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				(ACEC). Most recently, NHDOT has teamed with ACEC-NH to host a Technical Transfer Conference on April 13, 2006 in Concord, NH. This conference is geared toward increasing awareness of new technologies and techniques for pollution prevention as well other interests.	
1H	Grant Opportunities <i>Please note name change since original NOI submission</i> Review opportunities to apply for project grants to mitigate water quality impairments from roadway runoff. Program projects for this purpose to meet grant requirements.	Bureau of Environment	Note the project type, location, and whether the committee selected the project. If project is selected, report on the status.	NHDOT received a grant to upgrade its storm water/ NPS education presentation table, which is currently in progress and is anticipated to be rolled out next year. District Six received a NOAA Coastal Zone Restoration grant to assist in the storm drain mapping in the Seacoast area.	NHDOT will continue to work toward identifying suitable projects and available funding sources.
1I	Special Events Research the types of special events (ex. Earth Day, local fairs, Wild NH, etc) and determine appropriate involvement.	Bureau of Environment	Note the event and the type of involvement from NHDOT. Note the number of events per year.	The Materials and Research Bureau hosted a poster session on January 4, 2006 to provide an update on various research projects being conducted by NHDOT. NHDOT is currently working with NHDES to hold a Storm Water workshop on May 9, 2006 to discuss storm water	NHDOT will continue to look for appropriate events in which to participate and will contact other events groups such as the Department of Agriculture, NH Fair Association, NH DRED and others.



NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006) issues and proposed regulations within the state.	Planned Activities Year 4 (2006-2007)

NPDES Phase II - Small MS4 General Permit Annual Report

2.0 Public Participation and Involvement

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
CURRENT PROGRAMS					
2A	Sponsor A Highway Continue to support Sponsor A Highway program. Formerly BMP # 1D.	Bureau of Highway Maintenance; Bureau of Turnpikes	Quantity of roadside material collected.	The Program continues to represent one of the most successful programs for public participation with 450 different volunteer groups participating collecting trash on over 1,300 miles of roadway and over 24,000 bags of trash collected in 2005. Since the Program began in 1994, nearly 212,000 bags of trash have been collected. (See Appendix B for program data). NHDOT also supports the Annual Coastal Cleanup Event to picking up and disposing trash bags that were filled by volunteers that have picked up trash along the coastal beaches. NHDOT has over the years covered the cost of hauling and disposing of the collected trash.	NHDOT will continue supporting these programs and providing annual data.
2B	Stakeholders Meetings Meet with Stakeholder responsible for the development of NHDOT SWMP. These individuals are comprised of both NHDOT staff as well as individuals from other State Agencies and private professionals NOTE: This BMP is proposed for elimination since it primarily	Bureau of Environment: Commissioner's Office	No Further Action Required.	No Further Action Required	Remove this BMP in SWMP and next year's Annual Report.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	focused on internal meetings and meetings with other agencies, which was useful in the early stages of the MS4 Program, but is no longer needed. In addition, this BMP did not address public participation and involvement.				
2C	Continue Cooperation/ Coordination Efforts with Regulated Municipalities				
	Continue meeting with regulated communities and work on the addition of regulated communities that NHDOT is not involved with currently. Meet at least annually with the communities either individually or as a group, to come up with an integrated approach to fulfilling the storm water program.	Bureau of Environment	Aim for cooperative efforts with all of the regulated communities (municipalities, bordering states, and non-traditional). Document the number and summary of the meetings. Note how many new regulated communities are working with NHDOT.	NHDOT met regularly with Regional Storm Water Groups comprised of the various MS4 Communities. In this 3 rd year of the permit, NHDOT has coordinated with the Seacoast Group to initiate the development of an IDDE manual that is discusses further under BMP #3C. NHDOT is also currently working with NHDES to host a Storm Water workshop on May 9, 2006 geared toward municipal officials and storm water practitioners to discuss on storm water issues and regulations within the state.	NHDOT will continue to attend and encourage close coordination of the storm water groups to share common goals and work on similar issues toward solutions that benefit the communities and NHDOT alike. NHDOT will continue to coordinate with the Seacoast Storm Water Coalition in the review and finalization of the planned IDDE and maintenance SOP manual being prepared by their consultant and expected to be completed this Fall 2006
2D	NHDOT Public Meetings Continue providing public involvement with NHDOT projects through Public Officials and Public	Bureau of Environment; Bureau of Highway	Coordinate with the Environmental Project Managers and document the	NHDOT continued to schedule and promote public meetings related to new projects. For these	BOE personnel and District staff will continue to solicit input at public

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	Informational Meetings, as well as Public Hearings. Engage the public in specific discussions of storm water management issues.	Design Bureau of Bridge Design	number of public meetings that occurred within the regulated communities. Document any water quality issues that were brought to the Department's attention.	meetings NHDOT solicits public input about water quality and storm water issues. Where proposed projects are located in a Small MS4 community, local storm water coordinators will be specifically invited to these meetings to discuss storm water issues. The BOE and District personnel have worked with various Lake Associations across the state to respond or address erosion control issues associated new roadway work or maintenance of existing culvert that may pose a risk of increased turbidity in downstream lakes or streams. This past year, NHDOT personnel worked with the Canobie Lake Assoc. to provide outlet protection downstream of a culvert leading to the lake. Similar interactions were completed in the Webster lake watershed along Rte 111, along Route 175 in Holderness and Lake Chocorua along Route 16. In 2005, hosted about 25 different public hearings on various project related issues and another 20 public meetings throughout the state to public solicit input on the 10-year Transportation Master Plan.	meetings and work with Lake Assoc. and NHDES regarding preventing or remediating water quality problems and addressing storm water management aspects for all of its projects statewide.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	Notify and request input on storm water or other environmental issues from municipal officials, regional planning commissions and other State Agencies by sending out initial notification letters during the early project development phase. Note: This BMP description has been revised and expanded from the previous description of environmental "contact letters" to public officials.	Bureau of Environment	Incorporate any comments and concerns into the project design documents that were received through these letters during the project development phase.	By way of the February 9, 2005 policy, BOE personnel were instructed to modify initial contact letters to request the identification of water quality concerns with specific reference to NPDES Phase II storm water management. The new policy also provides a mechanism to follow-up with design and construction personnel should concerns be identified. Mechanism provides means to include consideration of temporary and permanent erosion control measures and potential right-of-way issues into project design.	The BOE will continue to use these notification letters to local (including storm water coordinator), state, and federal officials to solicit water quality concerns. BOE will continue to follow-up with discussions with design and construction staff as needed.
	Request a copy of all regulated communities' Small MS4 NOIs in order to develop cooperative efforts to achieve the overall storm water goals. NOTE: This BMP is proposed for removal. Reviewing other MS4 Community NOIs is no longer relevant.		No Further Action Required	No Further Action Required	Remove from SWMP and next year's Annual Report.
2E	NHDOT Storm Water Website NHDOT is no longer pursuing a separate storm water website but will focus on expanding the use of its current primary web site to promote public involvement and participation with regard to storm water issues.	Office of Information Technology; Bureau of Environment	Document meetings held and websites reviewed.	NHDOT has determined that adding additional materials and links to its current main website would be just as, if not more, effective than creating another separate website for storm water. Adding another website would	As time allows, Bureau of Environment staff will continue to add technical guidance, or project related storm water related information into the main NHDOT

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				likely provide only redundant information to that already provided on the DES website. For some of the larger, multi-year projects, separate project specific web sites have been created to host project related environmental documents and studies. As an internal reference tool, NHDOT is currently considering the development of a BOE intranet site, where department personnel can have access to more detailed environmental guidance documents and links to other sites. The site would include storm water related documents and NPDES Phase II resources.	website.
	Implement the website. NOTE: This portion of the BMP is proposed to be eliminated. See above	No further action	No further action	No further action	Remove from SWMP and next year's Annual Report.
2F	Public Survey Develop a community regional survey to assess needs and current programs within communities NOTE: This portion of the BMP is proposed for elimination. A community survey is no longer relevant.	No further action	No further action	No further action	Remove from SWMP and next year's Annual Report.

NPDES Phase II - Small MS4 General Permit Annual Report

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
CURRENT PROGRAMS					
3A	Update Current Guidance Assist in the development and review of an IDDE manual being prepared by Seacoast Storm Water Coalition and revise accordingly to be utilized and implemented into the NHDOT SWMP. NOTE: This BMP has been revised and improved.	Bureau of Highway Maintenance, Attorney General's Office	Coordinate with District Personnel to review guidance document.	In 2005, NHDOT collaborated with the Seacoast Coalition Group in retaining an outside consultant to develop an IDDE manual that could be adopted by the Seacoast MS4 communities as well as NHDOT with the appropriate modifications. This manual is targeted for completion by the Fall of 2006.	The proposed IDDE manual is expected to be completed in the Fall 2006. NHDOT expects to implement the IDDE manual in Spring 2007.
	Review and update the drainage connection assessment and approval letters used by District Personnel to allow property owners to connect or contribute runoff to NHDOT storm drain system. Additional language will be included to address non-storm water and illicit discharge. NOTE: This BMP has been revised and improved.	Bureau of Highway Maintenance, Attorney General's Office	Coordinate with District Personnel to explain purpose and intent of changes. Provide Public Notice of revised letter through press release and web site posting.	The Bureaus of Environment and Highway Maintenance are currently revising the drainage connection assessment and approval letters used by District personnel to allow adjacent property owners to contribute runoff to NHDOT drainage system.	The revised connection letters will be adopted with the additional language to prevent non-storm and in appropriate discharges to be connected to the system.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
3B	Drainage Map Map the entire NHDOT maintained drainage system located within the regulated Small MS4 communities. Incorporate field recorded drainage system attributes into the MATS system to assist in scheduling maintenance and/or replacement of drainage structures to improve water quality conditions. The information recorded includes structure type, condition, receiving water body and whether the structure needs maintenance attention or shows signs of deterioration. NOTE: This BMP has been revised and improved.	Bureau of Environment; Bureau of Highway Design; Bureau of Transportation Planning	Maintain sufficient progress to complete mapping of entire MS4 drainage system by May 2008.	In Sept. 2005, NHDOT embarked on an ambitious program to begin mapping its drainage system (including inlets, storm drains and outfalls) within the urbanized areas and identify all receiving waters. NHDOT has now identified the receiving water bodies associated with NHDOT maintained roadways in the urbanized area. (See Appendix A). The list also indicates whether the water body is listed as impaired base on the 2004 NHDES 303(d) list. NHDOT expects to complete its drainage system mapping by the end of this permit term (May 2008). NHDOT. To date, NHDOT has completed approximately 11 % of its storm water system within Small MS4 communities. NHDOT plans utilize additional personnel and equipment during summer months of 2006 with a goal of mapping 33 % of its system by end of 2006. (See Appendix C for mapping examples).	NHDOT plans to double and perhaps triple its mapping effort in 2006 in order to try to achieve a goal of completing about 40% of its drainage system by end of 2006 (See BMP #3C). Asses the availability if interns and need for additional GPS equipment to allow the mapping along approx. 670 miles of roadway to be completed by May 2008.
3C	Illicit Detection and Elimination Program Develop a process to detect and eliminate illicit discharge and/or connections based on the pending IDDE Manual being prepared by the Seacoast Coalition Communities. NHDOT will prioritize future IDDE efforts with consideration to impaired	Bureau of Environment; Bureau of Highway Design; Bureau of Transportation Planning and Highway	Develop and/or standardize IDDE Protocols by Spring 2007 to incorporate into mapping program.	NHDOT is currently informally assessing the possibility for illicit discharges as part of the drainage mapping effort. Recently, three possible illicit discharges were discovered during last Fall's mapping efforts. In these cases, NHDOT	Continue working toward a NHDOT IDDE policy and procedural guideline by adopting or modifying the pending IDDE manual being prepared by the SCC Group. NHDOT will continue to

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	water bodies, public water supplies, recreational uses and roadways that are in the most densely developed areas.	Maintenance		notified NHDES about the observed possible illicit discharges and suggested further investigations. NHDOT plans to use an intern this summer to conduct some limited site reconnaissance in specific areas to observe and/or test for dry weather flows. Similar observations will be recorded in the ongoing mapping effort until a more formal adoption of procedures is completed in 2007.	record suspicious discharges during 2006 mapping effort going on this summer. The BOE will develop set of recommendations to the Highway Maintenance to review and improve outfall conditions if they observe dry weather flow.
3D	Survey Bureaus of Highway Maintenance and Turnpikes Personnel				
	Survey the District highway maintainers to determine the types of non-storm water materials entering the MS4s and Waters of the US. NOTE: This BMP is proposed for elimination.	Bureau of Highway Maintenance; Bureau of Turnpikes		No Further Action.	Remove From SWMP and next year's Annual Report.

NPDES Phase II - Small MS4 General Permit Annual Report

4. Construction Site Runoff Control

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
CURRENT PROGRAMS					
4A	Storm Water Pollution Prevention Plan Review Continue reviewing and commenting on, and approving the project-specific SWPPPs.	Bureau of Environment	Review, update and document the approval process of the project-specific SWPPPs.	NHDOT continued to strengthen its construction site erosion control and review requirements. The Department recently completed an update to its internal guidance document "NHODT Guidelines for Temporary Erosion and Sediment Control and Storm Water Management". The Environmental Coordinators are responsible for construction site compliance have been transferred into Bureau of Environment from the Construction Bureau to be able to coordinate more closely with the storm water, wetland and other environmental project managers. These Coordinators continue to review and evaluate contractor SWPPPs on all NHDOT construction project to insure the information is consistent with the CGP requirements. NHODT has been educating contractors on SWPPPs order	The NHDOT is developing a database to document the number of SWPPPs reviewed and approved and how many required additional work and needed to be resubmitted. The information will be used to educate contractors who are not in compliance with the submittal requirements.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				to improve the process for E&S control review. NHDOT has been actively involved with the review and development process of the proposed Rule Revisions with the DES Site Alteration Program, which is setting new standards for erosion control.	
	Educate new erosion control inspectors hired by contractors on NHDOT expectations for inspections and erosion control maintenance. NOTE: This BMP has been revised and improved		Identify new erosion control inspectors that have not worked with NHDOT as SWPPPs are submitted and inspectors are listed.	NHDOT has sent a "Letter of Expectations and Goals" to E&S site monitors to make them aware of the need to evaluate the effectiveness of E&S BMPs in the field, to document ineffective practices, and to educate designers on potential problems with BMPs.	The NHDOT will continue to review SWPPPs and work with contractors and inspectors in the field and evaluate their success or failure.
4B	Routine Roadway Maintenance Activities in NH Coordinate with the Division of Operations and others as appropriate, with regard to erosion control issues as part of maintenance activities. NOTE: This BMP has been revised and improved	Bureau of Environment; Bureau of Highway Maintenance	Coordinate with Highway Maintenance personnel with planning and field review of erosion control BMPs.	With the transfer of the Environmental Coordinators, as discussed above, the BOE has expanded its review of erosion control BMPs to other divisions outside of the Construction Bureau. Through this expanded coordination, BOE believes that the Department's roadway maintenance is becoming more consistent across the various Districts in the State.	The hiring of another coordinator is planned for 2006 to provide additional review for relevant NHDOT activities.
4C	Storm Water Management Erosion and Sedimentation Control				

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	Reference Manuals Continue utilizing the storm water management erosion and sedimentation control manuals	Bureau of Environment;	Review manuals and reference materials to ensure that they remain in compliance with all Federal and State regulations.	NHDOT has updated its "Construction Manual", which is the general guidebook for all Department activities related to construction projects, including erosion and sediment control. The Department has also completed the update to the manual "NHDOT Guidelines for Temporary Erosion and Sediment Control and Stormwater Management". Both documents are now consistent with the CGP regulations.	The NHDOT will continue to design and implement BMPs according to the best available information. NHDOT will update erosion control design guidance accordingly as the proposed NHDES Site Alteration Rule changes become adopted, which is expected to occur in early 2007.
4D	Meetings with EPA Region 1 and NHDES Meet with EPA Region 1 and NHDES on an as needed basis to discuss water quality issues associated with construction-related activities. Note: This BMP has revised to change meeting frequency to on an as needed basis.	Bureau of Environment;	Prepare/file a conference report of any meeting noting agenda, attendees, points of interest and any action items.	NHDOT has participated in the NHDES Rules Advisory Committee to discuss proposed changes in the erosion control guidelines included in the recently proposed NHDES Site Alteration Rule Changes.	NHDOT will continue to keep open communication with NHDES and EPA Region 1 relative to construction-related issues.
4E	Project Design Appropriate drainage and erosion control measures including project planning, phasing and sequencing will continue to be a major focus as part of the roadway improvement design phase. Review all projects currently in the design phase. NOTE: This BMP has been revised	Bureau of Environment; Bureau of Highway Design; Bureau of Bridge Design	Meet regularly with the BOE Environmental Managers and the Highway Design Project Managers to discuss and document proposed projects with respect to storm water runoff and water quality BMPs that are needed and will be employed.	As mentioned above, NHDOT has been involved in NHDES proposed rule change process for their Site Alteration Program, which began in Oct. 2005. The proposed rule changes are not expected to be finalized until early 2007 but are intended to upgrade and	The BOE held an annual training session for Bureau of Bridge Design and Bureau of Highway Design employees in August 2005 to present an update in erosion control practices. NHDOT will assess how the proposed NHDES Rule changes might affect

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	and improved			strengthen the erosion control requirements and storm water BMP design criteria.	typical erosion control and storm water BMP designs for new projects with respect to the Memorandum of Agreement with DES concerning Site Alteration Program compliance.
	NOTE: This portion of the BMP is proposed for elimination; inventory of BMPs is geared toward permanent treatment measures, which is discussed in BMP #5B.	Bureau of Environment; Office of Information Technology	Inventory installed BMPs.	No Further Action Required	Remove From SWMP and next year's Annual Report.
PROPOSED PROGRAMS					
4F	Development of Database Form a stakeholders group to discuss the needs of the database. Develop the database. NOTE: This BMP is proposed for elimination -Again, data base inventory will be included as part of BMPs #3C and 5B.	Bureau of Environment; Office of Information Technology	Provide annual updates. Database development will rely on the availability of OIT personnel.	No Further Action Required	Remove From SWMP and next year's Annual Report.
4G	Specifications Review the current specifications and compare to the 2003-2008 Construction General Permit (CGP). Make revisions as appropriate.	Bureau of Environment; Bureau of Highway Design	Continue to review and maintain up to date construction specifications regarding storm water Best Management Practices.	The Construction specifications were recently updated in April 2005 and have been fully implemented. A new Special Attention was also drafted for contractors referencing NPDES Phase II requirements. This document will be included with construction contracts. NHDOT has forged a working	As noted above, NHDOT will continue to assess how the proposed NHDES Rule changes might affect erosion control and storm water BMP designs for new projects with respect to the Memorandum of Agreement with DES concerning Site Alteration Program compliance.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				relationship with NH Association of General Contractors, to share information and ideas, run educational workshops and draft specifications that are mutually acceptable to both NHDOT and the AGC.	
4H	Develop Public and Private Partnerships to Discuss Pertinent Construction Related Issues				
	NOTE: this BMP is proposed for elimination because it is redundant with BMP #6G.	Bureau of Environment	No Further Action Required	No Further Action Required.	Remove From SWMP and next year's Annual Report.
4I	SWPPP Template				
	NOTE: this BMP is proposed for elimination because the SWPPP format and review is addressed in BMP #4A. This BMP is no longer relevant.	Bureau of Environment	No Further Action Required	No Further Action Required	Remove From SWMP and next year's Annual Report.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
4J	Construction School Provide the Bureau of Construction personnel with training or updates on storm water issues and/or NPDES Phase II issues.	Bureau of Environment: Bureau of Construction	Note when training was held and the personnel trained.	During this 3rd year of the permit, the Construction School was held on January 26, 2006 and consisted of an interactive game show presentation modeled after the "Jeopardy" television show. In the game, contract administrators competed against private Design Engineers and Bureau of Construction Engineers to test their knowledge of the NPDES Phase II program. EPA and NHDES personnel in addition to dozens of Bureau of Construction employees were in attendance, which proved to be an effective training tool.	Continue providing updates on NPDES-related issues annually at Construction School. The Bureau of Environment will continue to revise and prioritize the education and outreach needs of the Department.
4K	ROW Constraints Review the ROW constraints associated with temporary and permanent water quality control measures. NOTE: this BMP is proposed for elimination because the ROW issues are addressed as part of project design BMP #4E. This BMP is no longer relevant.	Bureau of Highway Maintenance; Bureau of Construction; Bureau of ROW;	No Further Action Required	No Further Action Required	Remove From SWMP and next year's Annual Report

NPDES Phase II - Small MS4 General Permit Annual Report

5. Post Construction Runoff Control

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
5A	CURRENT PROGRAMS Review Storm Water BMP Designs for Proposed Projects Develop a consistent internal review process to evaluate the designs and needs of proposed water quality BMPs that would be included in new construction projects relative to sensitivity of the receiving waters. Note: this was formerly BMP 5C.	Bureau of Environment; Bureau of Highway Maintenance; Bureau of Construction	Establish a review process to evaluate BMPs designs on proposed projects to insure consistency with recent guidance criteria. Document and follow-up as required.	As mentioned earlier, NHDES is proposing new BMP design criteria as part of an update to the Site Alteration Program regulations. NHDOT will closely review any proposed storm water treatment BMP associated new highway construction projects to insure consistency with the new regulations.	The BOE is just beginning to assess how the proposed NHDES Site Alteration Rule changes as well as recent 401 Water Quality Certification requirements involving Pollutant Loading calculations will affect storm water BMP designs for new projects with respect to the Memorandum of Agreement with DES concerning Site Alteration Program compliance.
5B	Develop Data Base to Maintain Inventory Storm Water BMPs and Manage Drainage Infrastructure Assets To develop a database to allow tracking and scheduling of routine maintenance procedures (ex. culvert cleaning, street sweeping, etc) to enhance pollutant retention and source control and provide documentation of these activities to demonstrate compliance with MS4 BMP requirements. (See BMP 3B). Note: this was formerly BMP 5A.	Bureau of Highway Maintenance; Bureau of Turnpikes; Bureau of Bridge Maintenance	Input field mapping data into the MATS system and provide a summary on quantity maintained	In this past year, the MATs system has been brought online (See BMP #6A) and maintenance personnel are currently being trained on the drainage system components to record maintenance activities that will be incorporated into a data base that will enable tracking and scheduling maintenance activities.	NHDOT will continue to work toward integrating the drainage system components into MATS with the goal of utilizing MATS to have an up-to-date inventory of drainage assets. The Department will continue to track the progress of the deployment status of MATS this several year effort.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
5C	Standardize Routine Roadway and BMP Maintenance Procedures Develop and implement Standard Operating Procedures manual to be utilized as a guide for maintenance personnel in maintaining storm water BMPs. Note: this was formerly BMP 5B.	Bureau of Highway Maintenance; Bureau of Construction; Bureau of Environment	Develop a NHDOT SOP manual preferable a durable pocket-sized field manual to outline standard maintenance protocols for various BMPs.	NHDOT has completed a new internal guidance document: BMPs for Routine Maintenance Activities, to be used by all Maintenance Districts and Operations Bureaus as a reference tool in performing roadside maintenance in an environmentally sensitive manner. NHDOT is also coordinating with the Seacoast Coalition Group in developing a SOP manual for maintenance.	NHDOT will continue to coordinate with Seacoast Group to obtain and implement SOP maintenance manual as it becomes available in Fall 2006.
5D	Enhance/ Replace / Upgrade Roadway and Drainage Culverts to Rectify Observed Sediment and other Pollutant Source Areas Coordinate with Watershed Groups, Lake Assoc., etc. to Address Erosion Control Issues Related to Existing Roads and Culvert Washouts in Environmental Sensitive Areas. Note: this BMP is a new addition.	Bureau of Highway Maintenance; Bureau of Environment	Address complaint-based or other known pollutant source issues related to NHDOT drainage in a timely manner to satisfy stake holders and minimize water quality impacts.	NHDOT has responded and coordinated with various watershed groups in the state to address known problem areas. One recent example in the urbanized area includes working with the Canobie lake watershed to address a worsening erosion problem with an existing culvert.	NHDOT will continue to coordinate with resource agencies and volunteer groups as water quality issues are brought to their attention.



NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				NHDOT is also closely coordinated with NHDES providing funding and other resources to research and monitor chloride concentrations in numerous streams in southern New Hampshire. NHDOT will continue to work with NHDES and perhaps municipal officials in trying to resolve problem areas.	

NPDES Phase II - Small MS4 General Permit Annual Report

6. Pollution Prevention / Good Housekeeping

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
	CURRENT PROGRAMS				
6A	Environmental Management System (EMS - ISO 14001) Note: This BMP is proposed to be eliminated since it is no longer applicable and will be removed in future Annual Reports.	Department-wide	NHDOT feels that the EMS should be handled separately and not tied to the MS4 permit since it encompasses many other aspects and programmatic issues aside from storm water.	Although a formal EMS has not been adopted, NHDOT as a matter of practice will continue to identify measures to improve water quality and minimize impacts to water resources as discussed in the various BMPs in this Report.	Remove from SWMP and next year's Annual Report
6B	Managing Assets for Transportation Systems (MATS) <i>Note name change since original NOI submission.</i> Continue to inventory and incorporate NHDOT's drainage system in the MATS system to enable management and maintenance of the drainage related assets.	Bureau of Highway Maintenance;; Office of Information Technology; Finance and Contracts Administrator	Complete mapping and inventory of drainage system and develop procedures to prioritize and maintenance schedule using the MATS system.	The integration of the MATS system Department-wide is still evolving but an inter-departmental committee is continuing to make substantial progress in addressing problem areas. In 2005, as discussed in BMP 3C, a fair amount of the drainage system components (pipes, culverts, ditches, etc.), has inventoried and will soon be incorporated into MATS for the purposes of tracking "NPDES-related" assets.	NHDOT will continue to work toward integrating drainage system components into MATS with the goal of utilizing MATS to have a real-time inventory of its drainage assets, and to prioritize the maintenance frequency and scheduling, work activities, etc. for these components by end of permit period.
6C	Roadside Litter Removal Program Removal of roadside litter by all NH Maintenance Districts and Turnpikes.	Bureau of Highway Maintenance; Bureau of Turnpikes	Maintain a level of roadside cleanliness that is considered acceptable to the public based on the number of complaints	Roadside litter removal is part of the NHDOT maintenance program and is done throughout the year.	Continue removing roadside litter by all Maintenance Districts and Turnpikes. If staffing allows, NHDOT will

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
			received or lack thereof regarding litter.	Actual quantities of material are not typically calculated.	investigate a method for calculating the quantities of material that is removed by Department personnel.
6D	Coastal Cleanup Continue to support the annual Coastal Cleanup Program by collecting and disposing of the filled trash bags and other debris.	Bureau Highway Maintenance	Coordinate with District personnel to pickup trash bags and collected debris following each event.	In Fall 2005, District 6 collected the bags of litter left along the roadside. NH Route 1 corridor.	Continue to assist in the debris pickup and disposal in support of this program.
6E	Water-based Paints Although the water based paint continues to be used – Note: This BMP is proposed to be eliminated since no further action is necessary.	Bureau of Traffic	No Further Action required.	Practice will continue to be used for the foreseeable future	Remove from SWMP and next year's Annual Report.
6F	Provide NHDOT employees training on storm water related issues and the NPDES Phase II program NHDOT will continue providing appropriate presentations to Department staff relative to storm water issues and the NPDES Phase II program. Note; was formerly BMP #1C	Bureau of Environment and Highway Maintenance; Commissioner's Office;	A total number of presentations/meetings and the target audience within the reporting year will be documented. A follow-up on identified issues will be noted and required actions identified.	NHDOT's held a number of internal training session focused on pollution prevention including briefings on the Remedial General Permit Program at the following meetings: Oct. 24, 2005; Commissioner Briefing Nov. 8, 2005; Construction Administration Nov. 10, 2005; Consultant Design Jan. 26, 2006; Construction School March 14 2006; Final Design Group.	NHDOT will continue to update and modify training to Department Personnel. The Bureau of Environment will note the training needs and prioritize those needs for subsequent training sessions.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				At the Annual "Construction-School" workshop held on Jan. 26, 2006, NHDOT presented in interactive game of "Jeopardy" where the Contract Administrators competed against Design Engineers to test their knowledge on the NPDES P2 Program and CGP requirements. This interactive game show received positive feedback as an effective training tool for all those attending. NHDOT also provided a 2-day workshop in April 2006 on snow and ice control for all highway maintenance personnel. In addition, ten (10) employees attended a Drainage Design course hosted by UNH T2 Center. Two employees toured the Storm water BMP Research Center at UNH: eight (8) employees attended RWIS training: and numerous maintenance staff attended the NEAPWA Snow and Ice Conference.	

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
6G	Guidance Materials Update guidance documents and evaluate the need for additional guidance. <i>Note: This BMP was previously BMP IE and the reference to Industrial Activities has been removed from this BMP.</i>	Bureau of Environment	Document the guidance document title and summarize the changes. Note any additional guidance materials that have been or will be developed.	NHDOT has developed a new internal guidance document: BMPs for Routine Maintenance Activities for use by all Maintenance Districts and Operations bureaus as an educational reference tool and for performing roadside maintenance and being sensitive to environmental issues. The Bureau of Environment also prepared an internal guidance document entitled "NHDOT Guidelines for Temporary Erosion and Sedimentation control and Storm Water Management." The BOE and Construction Bureau also refer to NHDES's BMPs for Urban Storm Water Runoff Guidance Document (1996) for new construction and drainage design.	The BOE will continue to refine and adopt procedures, and provide employee training to implement standardized procedures statewide.
Former-6F	No Exposure Certification <i>NOTE: This BMP is proposed to be eliminated since NHDOT maintenance sheds are not regulated under the MSGP for industrial activities</i>	Bureau of Environment	No Further Action Required	Although the no further actions are required, the NHDOT continues to review patrol sheds in an effort to be good stewards of the environment and to improve	Remove from SWMP and future Annual Reports.

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
Former- 6G	Water Quality BMPs			housekeeping practices across the six Districts. NHDOT has recently been focused on providing roof structures over refueling areas.	
	Note: This BMP is exactly the same as BMP 5A and is proposed for elimination.	Bureau of Highway Design; Bureau of Environment	No Further Action Required	No Further Action Required	Remove from SWMP and future Annual Reports.
6H	Winter Maintenance Activities Review current procedures and determine ways to reduce the environmental impacts. Implement new procedures and/or technologies.	Commissioner's Office, Bureaus of Highway Maintenance, Turnpikes and Environment	Document research and meetings. Document current practices and make recommendations relative to new technologies. Meet with appropriate Department personnel to review current deicing procedures. Track implementation, specifically reduction in pollutants	During this past winter, NHDOT continued to assess the effectiveness of the salt brine project used on I-93 between Salem and Manchester. A goal of the project is to reduce the amount of salt use by up to 40% by pre-treating road surfaces with a 23% brine solution made from solar salt. The brine works by preventing the build-up of an ice layer which bonds with pavement during some snow events. NHDOT also implemented new snow and ice training workshops this year as noted above in BMP 6F.	NHDOT will evaluate the data from the pilot study and review other ways that it can reduce the use of road salt on its highways. If it deems the pilot study a success, the Department will expand the use of brine solution to other roadways such as the F. E. Everett Turnpike. NHDOT will continue to provide annual training and report on the status of its efforts to reduce the impact of winter salt usage on the environment. Future Reports will provide a status update of RWIS system
			In addition, four roadway weather information stations		

NPDES Phase II - Small MS4 General Permit Annual Report

BMP ID #	BMP Description	Responsible Team/ Bureau Name	Measurable Goal	Progress on Goal(s) Permit Year 3 (2005-2006)	Planned Activities Year 4 (2006-2007)
				(RWIS) were installed in MS4 areas and a total of 11 RWIS stations statewide working with Plymouth State University as a means of providing early warning of adverse weather as it moves into the region. This allows for more efficient use and timing of road salt applications. NHDOT plans to eventually establish 55 RWIS stations throughout the state.	

Appendix A

BMP #3B – List of Receiving Water Bodies within Small MS4 boundaries

TOWN_NAME	ENTITY_ID	WATERBODYN	303DImpaired	Outfalls
AMHERST	NHRIV700060906-16	SOUHEGAN RIVER		
AMHERST	NHRIV700060906-18	SOUHEGAN RIVER		
AMHERST	NHRIV700060906-03	BEAVER BROOK		
ATKINSON	NHIMP700061401-03	FOOTE BROOK - PRIVATE SWIMMING POOL		
ATKINSON	NHRIV700061401-05	UNNAMED BROOK - TO BLUNTS POND		
ATKINSON	NHRIV700061401-06	FOOTE BROOK		
ATKINSON	NHRIV700061401-07	FOOTE BROOK		
AUBURN	NHRIV700060702-02	UNNAMED BROOKS - TO MASSABESIC LAKE		
AUBURN	NHRIV700060702-03	NEAT BROOK - UNNAMED BROOK - TO MASSABESIC LAKE		
AUBURN	NHRIV700060703-02	UNNAMED BROOKS - TO CALEF POND		
BEDFORD	NHRIV700060803-11	UNNAMED BROOKS - TO PATTEN BROOK		
BEDFORD	NHRIV700060905-18	RIDDLE BROOK	Impaired	
BEDFORD	NHRIV700060905-15	MCQUADE BROOK		
BEDFORD	NHRIV700060905-11	PULPIT BROOK		
BEDFORD	NHRIV700060804-01	SEBBINS BROOK - POINTER CLUB BROOK		
BEDFORD	NHRIV700060803-12	PATTEN BROOK		
BEDFORD	NHRIV700060803-05	BOWMAN BROOK		
BEDFORD	NHRIV700060803-03	BOWMAN BROOK		
BEDFORD	NHRIV700060803-13	UNNAMED TRIBUTARY - TO MERRIMACK RIVER		
DANVILLE	NHIMP700061403-02	COLBY BROOK		
DANVILLE	NHRIV700061403-05	BARTLETT BROOK		
DANVILLE	NHRIV700061403-08	POWWOW RIVER		
DERRY	NHRIV700061203-06	SALMON BROOK		
DERRY	NHRIV700061203-09	WEST RUNNING BROOK	Impaired	Mapped
DERRY	NHRIV700061203-11	BEAVER BROOK		Mapped
DERRY	NHRIV700061203-08	UNNAMED BROOK - TO BEAVER LAKE		
DERRY	NHRIV700061203-02	UNNAMED BROOK - FROM HURANTIS LAKE TO ADAMS POND	Impaired	
DERRY	NHRIV700061101-08	UNNAMED BROOKS - FROM ISLAND POND TO TAYLOR RESERVOIR		
DERRY	NHRIV700061101-01	DREW BROOK - CUNNINGHAM BROOK		
DERRY	NHRIV700061101-04	TAYLOR BROOK		
DERRY	NHRIV700061203-16	BEAVER BROOK	Impaired	
DERRY	NHRIV700061203-04	SALMON BROOK - COLD BROOK		
DOVER	NHES7600030904-06-08	LITTLE BAY CA2	Impaired	Mapped
DOVER	NHRIV600030903-08	BELLAMY RIVER - KELLY BROOK - KNOX MARSH BROOK	Impaired	Mapped
DOVER	NHRIV600030608-07	EMERSON BROOK		Mapped
DOVER	NHRIV600030608-05	COACHECO RIVER	Impaired	
DOVER	NHRIV600030608-04	REYNERS BROOK		
DOVER	NHES7600031001-01	UPPER PISCATAQUA RIVER	Impaired	Mapped

TOWN NAME	ENTITY ID	WATERBODYN	303DImpaired	Outfalls
DOVER	NHRIV600030903-11	VARNEY BROOK - CANNEY BROOK	Impaired	
DOVER	NHEST600030904-06-06	LOWER LITTLE BAY	Impaired	
DOVER	NHEST600030903-01	BELLAMY RIVER	Impaired	Mapped
DOVER	NHEST600030406-01	SALMON FALLS RIVER	Impaired	
DOVER	NHEST600031001-02	LOWER PISCATAQUA RIVER	Impaired	
DURHAM	NHRIV600030902-04	OYSTER RIVER - CHELSEY BROOK	Impaired	
DURHAM	NHRIV600030902-09	COLLEGE BROOK	Impaired	Mapped
DURHAM	NHRIV600030902-11	LITTLEHOLE CREEK		
DURHAM	NHRIV600030902-08	HAMEL BROOK	Impaired	
DURHAM	NHIMP600030902-06	BEARDS CREEK	Impaired	Mapped
DURHAM	NHEST600030902-01-03	OYSTER RIVER	Impaired	Mapped
DURHAM	NHEST600030902-01-01	OYSTER RIVER (JOHNSON CR)	Impaired	Mapped
DURHAM	NHEST600030902-01-02	OYSTER RIVER (BUNKER CR)	Impaired	
EXETER	NHLAK600030804-01	COLCORD POND	Impaired	
EXETER	NHRIV600030804-11	LITTLE RIVER - SCAMEN BROOK	Impaired	
EXETER	NHRIV600030805-02	EXETER RIVER	Impaired	
EXETER	NHRIV600030806-03	WHEELWRIGHT CREEK		
EXETER	NHRIV600031003-06	TAYLOR RIVER - ASH BROOK		
GOFFSTOWN	NHRIV700060607-16	DAN LITTLE BROOK		
GREENLAND	NHRIV600030904-05	FOSS BROOK		Mapped
GREENLAND	NHEST600030904-01	WINNICUT RIVER	Impaired	
GREENLAND	NHRIV600031002-01	BERRY'S BROOK	Impaired	Mapped
GREENLAND	NHRIV600030904-06	PICKERING BROOK	Impaired	Mapped
GREENLAND	NHRIV600030901-03	HAINES BROOK		Mapped
GREENLAND	NHIMP600030901-03	UNKNOWN RIVER - PACKER BROOK POND		Mapped
GREENLAND	NHIMP600030901-02	UNKNOWN RIVER - WINNICUT RIVER DAM POND	Impaired	
GREENLAND	NHRIV600030901-04	HAINES BROOK - UNNAMED BROOKS		Mapped
HAMPSTEAD	NHIMP700061101-01	UNKNOWN RIVER - WASH POND LOWER DAM		
HAMPSTEAD	NHRIV700061102-01	UNNAMED BROOK - TO JOHNSON POND		
HAMPSTEAD	NHRIV700061102-03	UNNAMED BROOK - THRU HOG HILL POND		
HAMPSTEAD	NHRIV700061102-04	HOG HILL BROOK		
HAMPSTEAD	NHRIV700061401-04	KELLY BROOK - SEAVER BROOK	Impaired	
HAMPTON	NHOCN000000000-02-10	ATLANTIC OCEAN - HAMPTON BEACH STATE PARK BEACH	Impaired	Mapped
HAMPTON	NHRIV600031003-13	TAYLOR RIVER - DRAKES RIVER - KENNEY BROOK		
HAMPTON	NHRIV600031003-10	UNNAMED BROOK - TO COTTON POND		
HAMPTON	NHRIV600031003-07	OLD RIVER - TO CAR BARN POND		
HAMPTON	NHOCN000000000-02-12	ATLANTIC OCEAN - NORTH BEACH	Impaired	
HAMPTON	NHOCN000000000-02-01	ATLANTIC OCEAN (1.5 MILE)	Impaired	Mapped

TOWN NAME	ENTITY ID	WATERBODYN	303D	Impaired	Outfalls
HAMPTON	NHEST600031004-09-04	HAMPTON/SEABROOK HARBOR	Impaired		
HAMPTON	NHEST600031004-03-02	TIDE MILL CREEK 2	Impaired		
HAMPTON	NHEST600031004-03-01	TIDE MILL CREEK 1	Impaired		
HAMPTON	NHOCN000000000-08-01	ATLANTIC OCEAN - SEABROOK WWTP OUTFALL INSHORE	Impaired		
HAMPTON FALLS	NHRIV600031003-04	HAMPTON FALLS RIVER		Mapped	
HOLLIS	NHRIV700040402-02	SUCKER BROOK			
HOLLIS	NHRIV700040402-03	FLINTS BROOK			
HOLLIS	NHRIV700040402-05	NASHUA RIVER			
HOLLIS	NHRIV700040402-06	BARTEMUS BROOK			
HOOKSETT	NHRIV700060802-07	PETERS BROOK		Mapped	
HOOKSETT	NHRIV700060802-12	UNNAMED BROOK - TO GOLDFISH POND		Mapped	
HOOKSETT	NHRIV700060802-13	UNNAMED BROOK - FROM GOLDFISH POND TO DORRS POND		Mapped	
HOOKSETT	NHRIV700060802-08	DALTON BROOK		Mapped	
HOOKSETT	NHRIV700060802-02	BROWN BROOK			
HOOKSETT	NHLAK700060802-04	GOLDFISH POND	Impaired	Mapped	
HOOKSETT	NHRIV700060802-09	MESSER BROOK		Mapped	
HOOKSETT	NHRIV700060802-05	UNNAMED BROOK - TO MERRIMACK RIVER			
HUDSON	NHIMP700061206-01	UNKNOWN RIVER - ICE POND DAM			
HUDSON	NHRIV700061002-07	CHASE BROOK			
HUDSON	NHRIV700061002-11	UNNAMED BROOK - TO MERRIMACK RIVER			
HUDSON	NHRIV700061002-12	REEDS BROOK			
HUDSON	NHRIV700061203-21	BEAVER BROOK			
HUDSON	NHRIV700061206-02	MERRILL BROOK			
HUDSON	NHRIV700061206-09	UNNAMED BROOKS - TO SECOND BROOK			
HUDSON	NHRIV700061206-22	MUSQUASH BROOK - LAWRENCE BROOK			
HUDSON	NHRIV700061206-23	MUSQUASH BROOK - LIMIT BROOK			
KINGSTON	NHRIV600030805-03	BRICKYARD BROOK			
KINGSTON	NHRIV700061401-01	LITTLE RIVER			
KINGSTON	NHRIV700061403-14	POWOW RIVER			
LEE	NHRIV600030902-04	OYSTER RIVER - CHELSEY BROOK	Impaired		
LITCHFIELD	NHRIV700060804-08	WATTS BROOK			
LITCHFIELD	NHRIV700060804-09	UNNAMED BROOK - THRU LEACH ICE POND TO MERRIMACK RIVER			
LITCHFIELD	NHRIV700061002-05	NESENKEAG BROOK	Impaired		
LITCHFIELD	NHRIV700061002-09	CHASE BROOK - LITTLE NESENHEAG BROOK			
LONDONDERY	NHRIV700061203-20	BEAVER BROOK	Impaired		
LONDONDERY	NHRIV700060804-04	LITTLE COHAS BROOK		Mapped	
LONDONDERY	NHRIV700061002-04	NESENKEAG BROOK	Impaired		
LONDONDERY	NHRIV700061002-05	NESENKEAG BROOK	Impaired		

TOWN_NAME	ENTITY_ID	WATERBODYN	303DImpaired	Outfalls
LONDONDERY	NHRIV700061203-11	BEAVER BROOK		Mapped
LONDONDERY	NHRIV700061203-16	BEAVER BROOK	Impaired	
LONDONDERY	NHRIV700061203-21	BEAVER BROOK		
MADBURY	NHRIV600030902-13	JOHNSON CREEK - GERRISH BROOK	Impaired	
MANCHESTER	NHRIV700060801-06	BLACK BROOK	Impaired	
MANCHESTER	NHRIV700060803-07	UNNAMED BROOK - TO STEVENS POND		
MANCHESTER	NHRIV700060802-11	UNNAMED BROOK - TO MERRIMACK RIVER		
MANCHESTER	NHRIV700060703-08	COHAS BROOK		
MANCHESTER	NHRIV700060703-07	COHAS BROOK		
MANCHESTER	NHRIV700060703-05	COHAS BROOK - LONG POND BROOK	Impaired	
MANCHESTER	NHRIV700060702-04	UNNAMED BROOKS - TO MASSABESIC LAKE		
MANCHESTER	NHRIV700060607-22	PISCATAQUOG RIVER		
MANCHESTER	NHLAK700060803-02	STEVENS POND	Impaired	
MANCHESTER	NHRIV700060802-14-02	MERRIMACK RIVER	Impaired	
MERRIMACK	NHLAK700061001-04-02	BOWERS POND	Impaired	
MERRIMACK	NHRIV700061001-07	PENNICHUCK BROOK - WITCHES BROOK		
MERRIMACK	NHRIV700061002-02	NATICOOK BROOK		
MERRIMACK	NHRIV700061001-10	PENNICHUCK BROOK		
MERRIMACK	NHRIV700061001-08	UNNAMED BROOK - TO BOWER POND		
MERRIMACK	NHRIV700060906-18	SOUHEGAN RIVER		
MERRIMACK	NHRIV700060804-02	DUMPLING BROOK - TO FISH POND		
MERRIMACK	NHIMP700060804-02	DUMPLING BROOK		
MERRIMACK	NHRIV700060905-19	BABOOSIC BROOK - RIDDLE BROOK	Impaired	
MILFORD	NHRIV700060906-08	GREAT BROOK		
MILFORD	NHRIV700060906-12	OX BROOK		
MILFORD	NHRIV700060906-15	UNNAMED BROOK - TO SOUHEGAN RIVER		
MILFORD	NHRIV700060906-16	SOUHEGAN RIVER		
MILTON	NHRIV600030405-06	UNNAMED BROOK - TO SALMON FALLS RIVER		
MILTON	NHRIV600030405-04	LYMAN BROOK		
MILTON	NHLAK600030404-01-01	MILTON POND	Impaired	
MILTON	NHLAK600030404-01-02	TOWNHOUSE POND	Impaired	
MILTON	NHRIV600030404-06	UNNAMED BROOK - TO TOWN HOUSE POND		
NASHUA	NHRIV700061001-07	PENNICHUCK BROOK - WITCHES BROOK		
NASHUA	NHRIV700061206-15	SPT BROOK		
NASHUA	NHIMP700040402-04	NASHUA RIVER - NASHUA CANAL		
NASHUA	NHRIV700061001-09	UNNAMED BROOK - TO PENNICHUCK BROOK (BOIRE FIELDS)	Impaired	
NASHUA	NHRIV700040402-08	NASHUA RIVER	Impaired	
NASHUA	NHRIV700040402-06	BARTEMUS BROOK		

TOWN NAME	ENTITY ID	WATERBODYN	303D	Impaired	Outfalls
NASHUA	NHLAK700061001-04-02	BOWERS POND	Impaired		
NASHUA	NHRIV700061201-05	SALMON BROOK - HASSELLS BROOK - OLD MAIDS BROOK - HALE B	Impaired		
NEW CASTLE	NHEST600031002-02	LITTLE HARBOR	Impaired		
NEW CASTLE	NHEST600031001-02	LOWER PISCATAQUA RIVER	Impaired		
NEW CASTLE	NHEST600031001-05	BACK CHANNEL	Impaired		
NEW CASTLE	NHEST600031001-08	WENTWORTH-BY-THE-SEA	Impaired		
NEWINGTON	NHRIV600031001-07	PAULS BROOK - PEASE AIR FORCE BASE	Impaired		
NEWINGTON	NHRIV600030904-11	MCINTYRE BROOK - PEASE AIR FORCE BASE	Impaired		Mapped
NEWINGTON	NHIMP600030904-01	UNKNOWN RIVER - KENNARD	Impaired		Mapped
NEWINGTON	NHRIV600030904-08	UNNAMED BROOK - TRHOUGH UNNAMED MARSH TO GREAT BAY			Mapped
NEWTON	NHRIV700061403-13	UNNAMED BROOK - TO COUNTRY POND			
NEWTON	NHRIV700061403-17	POWWOW RIVER	Impaired		
NORTH HAMPTON	NHOCN000000000-04	ATLANTIC OCEAN - CHAPEL BROOK	Impaired		
NORTH HAMPTON	NHOCN000000000-06	ATLANTIC OCEAN - LITTLE RIVER	Impaired		
NORTH HAMPTON	NHRIV600030901-01	WINNICUT RIVER - CORNELIUS BROOK	Impaired		Mapped
NORTH HAMPTON	NHRIV600031004-01	LITTLE RIVER - UNNAMED BROOK			
NORTH HAMPTON	NHRIV600031004-03	LITTLE RIVER - UNNAMED BROOK			Mapped
NORTH HAMPTON	NHRIV600031004-04	LITTLE RIVER	Impaired		
PELHAM	NHRIV700061205-01	BEAVER BROOK - TONY'S BROOK	Impaired		
PELHAM	NHRIV700061205-03	NEW MEADOW BROOK			
PELHAM	NHRIV700061205-06	GUMPAS POND BROOK			
PELHAM	NHRIV700061203-22	BEAVER BROOK	Impaired		
PELHAM	NHRIV700061203-21	BEAVER BROOK			
PELHAM	NHRIV700061204-03	GOLDEN BROOK			
PLAISTOW	NHRIV700061401-01	LITTLE RIVER			
PLAISTOW	NHRIV700061401-04	KELLY BROOK - SEAVER BROOK	Impaired		
PLAISTOW	NHRIV700061401-07	FOOTE BROOK			
PORTSMOUTH	NHRIV600031001-05	LOWER NEWFIELDS BROOK (UPPER HODGSON BR) - PEASE AIR F	Impaired		
PORTSMOUTH	NHRIV600031001-06	LOWER GRAFTON BROOK - PEASE AIR FORCE BASE	Impaired		
PORTSMOUTH	NHRIV600031001-04	HODGSON'S BROOK	Impaired		
PORTSMOUTH	NHRIV600030904-06	PICKERING BROOK	Impaired		Mapped
PORTSMOUTH	NHEST600031001-05	BACK CHANNEL	Impaired		
PORTSMOUTH	NHEST600031001-02	LOWER PISCATAQUA RIVER	Impaired		
PORTSMOUTH	NHEST600031001-03	UPPER SAGAMORE CREEK	Impaired		
PORTSMOUTH	NHEST600031001-10	NORTH MILL POND	Impaired		
ROCHESTER	NHRIV600030603-06	COACHECO RIVER	Impaired		
ROCHESTER	NHRIV600030608-02	BLACKWATER BROOK			Mapped
ROCHESTER	NHRIV600030607-14	COACHECO RIVER			

TOWN NAME	ENTITY ID	WATERBODYN	303DImpaired	Outfalls
ROCHESTER	NHRIV600030607-12	UNNAMED TRIBUTARY - TO COACHEO RIVER		
ROCHESTER	NHIMP600030405-04	SALMON FALLS RIVER - BAXTER MILL DAM POND	Impaired	Mapped
ROCHESTER	NHRIV600030603-10	WORDLEY BROOK - UNNAMED BROOKS		
ROCHESTER	NHRIV600030602-03	AXE HANDLE BROOK - HOWARD BROOK	Impaired	
ROCHESTER	NHRIV600030405-08	HEATH BROOK		Mapped
ROCHESTER	NHRIV600030607-07	UNNAMED BROOK - TO HANSON POND		Mapped
ROLLINSFORD	NHRIV600030608-08	FRESH CREEK - TWOMBLY BROOK		Mapped
ROLLINSFORD	NHRIV600030608-11	FRESH CREEK		Mapped
ROLLINSFORD	NHRIV600030608-10	ROLLINS BROOK		Mapped
ROLLINSFORD	NHRIV600030608-09	UNNAMED BROOK - ROLLINS BROOK		Mapped
ROLLINSFORD	NHRIV600030406-05	SLIGO BROOK		Mapped
ROLLINSFORD	NHIMP600030608-05	UNKNOWN RIVER - CONSERVATION POND		
ROLLINSFORD	NHIMP600030406-04	SALMON FALLS RIVER - SOUTH BERWICK DAM	Impaired	Mapped
ROLLINSFORD	NHRIV600030608-07	EMERSON BROOK		Mapped
RYE	NHEST600031002-02	LITTLE HARBOR	Impaired	
RYE	NHRIV600031002-10	UNNAMED BROOK - FROM EEL POND TO ATLANTIC OCEAN RYE OU		
RYE	NHRIV600031002-05	UNNAMED BROOK - TRHOUGH AWCOMIN MARSH TO ATLANTIC OCE		
RYE	NHRIV600031002-03	UNNAMED BROOKS - TO ATLANTIC OCEAN AT CONCORD POINT		
RYE	NHRIV600031002-01	BERRY'S BROOK	Impaired	Mapped
RYE	NHOCN000000000-02-01	ATLANTIC OCEAN (1.5 MILE)	Impaired	Mapped
RYE	NHEST600031001-08	WENTWORTH-BY-THE-SEA	Impaired	
RYE	NHEST600031001-05	BACK CHANNEL	Impaired	
RYE	NHEST600031001-04	LOWER SAGAMORE CREEK	Impaired	
RYE	NHOCN000000000-07	ATLANTIC OCEAN - PARSONS CREEK	Impaired	
SALEM	NHRIV700061102-15	SPCKET RIVER		
SALEM	NHRIV700061102-17	POLICY BROOK		
SALEM	NHRIV700061101-10	UNNAMED BROOK - TO ARLINGTON MILL RESERVOIR		
SALEM	NHRIV700061102-13	FLATROCK BROOK		
SALEM	NHRIV700061102-18	POLICY BROOK - PORCUPINE BROOK	Impaired	Mapped
SANDOWN	NHRIV600030802-03	EXETER RIVER	Impaired	
SANDOWN	NHRIV700061403-05	BARTLETT BROOK		
SEABROOK	NHRIV600031004-11	CAIN'S BROOK		
SEABROOK	NHEST600031004-08-01	BLACKWATER RIVER 1	Impaired	
SEABROOK	NHRIV600031003-01	HAMPTON FALLS RIVER - WINKELY BROOK		
SEABROOK	NHRIV600031004-07	BROWNS RIVER		
SOMERSWORTH	NHRIV600030608-08	FRESH CREEK - TWOMBLY BROOK		Mapped
SOMERSWORTH	NHRIV600030405-13	TATES BROOK		Mapped
SOMERSWORTH	NHRIV600030608-02	BLACKWATER BROOK		Mapped

TOWN NAME	ENTITY ID	WATERBODYN	303DImpaired	Outfalls
WINDHAM	NHRIV700061204-03	GOLDEN BROOK		
WINDHAM	NHLAK700061204-01-01	COBBETTS POND	Impaired	
WINDHAM	NHRIV700061102-13	FLATROCK BROOK		
WINDHAM	NHRIV700061203-21	BEAVER BROOK		
WINDHAM	NHRIV700061204-01	UNNAMED BROOK - TO COBBETTS PONS		
WINDHAM	NHRIV700061204-02	GOLDEN BROOK		

Appendix B

BMP #2A – Sponsor-A-Highway Data

***State of New Hampshire
Department of Transportation***

Sponsor-A-Highway Program

Annual Summary - 2005

Report Number 12
December 2005

<u>District</u>	<u>Miles</u>	<u>(KM)</u>	<u>Number of Groups</u>	<u>Number of Pick-Ups</u>	<u>Number of Bags</u>
1	206	332	76	141	2,608
2	278	447	68	164	2,223
3	84	135	37	140	2,332
4	176	283	79	143	3,558
5	262	422	110	147	2,916
6	180	290	86	139	2,803
Interstate MP	76	122	N/A	N/A	7,040
Turnpike MP	64	103	N/A	N/A	1,086
Totals:	1,326	2,134	456	874	24,566
Previous Year	1,505	2,408	543	915	19,499

Notes/Comments:

2005

Average Number of Bags per Mile:	18.5
Average Number of Miles per Group:	2.6 (excluding maintenance provider sections-MP)
Average Number of Bags per Group:	36.1 (excluding maintenance provider sections-MP)

Since Beginning 1994

Total Bags 211,947

Appendix C

BMP #3C – Mapping Examples of NHDOT Outfalls



