

**New Hampshire Small MS4 General Permit
Annual Report
Town of Raymond, New Hampshire
Permit Year 3
July 1, 2020 through June 30, 2021**

EPA NPDES Permit Number NHR041042

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

Printed Name

George Plante

Signature

George Plante

Date

2-17-22

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Small MS4 Authorization

The following annual report, which serves as a self-assessment, is intended to document the activities undertaken over the reporting period from July 1, 2020, through June 30, 2021 in accordance with the Permit.

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

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

Compliance activities have been identified and described in the following report. The Municipality currently does not have a Stormwater Management Plan nor an Illicit Discharge Detection and Elimination Plan (IDDE). Once developed, the IDDE and Stormwater Management Plans will be available at www.raymondnh.gov.

MCM1 - Public Education and Outreach

Year 3 Activities

In 2020 the Town of Raymond worked to develop a Communication Outreach Strategy to effectively meet MS4 communication and education objectives. Additionally, a municipal communication outreach working group was established to analyze communication modes that could be best utilized to reach the broadest level of dissemination and education (see attached document). Due to the COVID-19 Pandemic and changes in town staff, outreach strategies identified in the 2020 outreach plan were deferred. The outreach strategies will be reviewed in Year 4.

BMP: Grass and Fertilizer

Message Date: Deferred due to COVID19 and change in town staff

BMP: Pet Waste Disposal

Message Date: Deferred due to COVID19 and change in town staff

BMP: Disposal of Leaf and Grass Clippings

Message Date: Deferred due to COVID19 and change in town staff

BMP: Septic System Maintenance

Message Date: Deferred due to COVID19 and change in town staff

BMP: Industrial Outreach

Messaging for industrial outreach will be completed in Year 4.

MCM2 - Public Participation

BMP: Public Participation in Stormwater Management Program Development

Public participation obligations were deferred due to the COVID19 Pandemic and staffing changes.

MCM3 – Illicit Discharge Detection and Elimination

BMP: IDDE Legal Authority

The municipality has established legal authority.

BMP: Sanitary Sewer Overflow (SSO) Inventory

The Town of Raymond has no sanitary sewer system. 100% of the town development utilizes on-site septic or holding tank facilities

BMP: Map of Storm Sewer System

Map of storm sewer system and associated outfalls is in progress. Discussions are underway to determine the scope of effort required to locate and map storm sewer systems and associated outfalls. All known catch basins have been located but are not on a GIS map.

BMP: IDDE Program (Screenings of Outfalls/Interconnections, Catchment Investigations, and IDDE Progress)

A written IDDE plan has not yet been developed.

BMP: Employee Training

As a routine, IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees.

MCM4 – Construction Site Stormwater Runoff Control

Site Plan regulations have been revised to include Construction Site Stormwater Runoff Control requirements.

As a condition of approval, each residential and/or commercial development which disturbs land is periodically inspected by the Planning Board's consulting engineer. The developer's engineer is responsible for maintaining SWPPP reporting. Any issues regarding the scope of development, land disturbance or runoff issues are addressed with all parties.

Number of site plan reviews completed: Five site plans, one major subdivision

Number of inspections: Approximately 20+/- site visits

Number of enforcement actions: No enforcement actions required; issues were addressed with verbal directives to correct any issues.

MCM5 – Post Construction Stormwater Management in New Development and Redevelopment

BMP: Post-Construction Ordinance (due in year 3)

A Post-Construction Ordinance has not been drafted or adopted. Deferred due to COVID19 Pandemic and staffing changes. This will be addressed in Year 4.

MCM6 – Good Housekeeping and Pollution Prevention for Permittee Owned Operations

BMP: Catch Basin Cleaning Program

Annual catch basin cleaning has been established with the goal of inspecting each basin and cleaning those with any measurable sediment.

The following tasks are in progress in accordance with the permit.

Number of catch basins within MS4 regulated area: 182 basins

Number of catch basins inspected in accordance with the SWMP: 304 (all known basins)

Number of catch basins cleaned: 182 basins

Total volume or mass of material removed: 81.2 tons

BMP: Street Sweeping Program

A street sweeping program has been established such that all streets with curbing and/or catch basins and permittee-owned parking lots are swept in accordance with permit conditions.

The following tasks are in progress in accordance with the permit.

Number of (lane) miles swept: All town roads: 140+/- lane miles

Volume or mass of swept material: Estimated volume – 120 to 130 cubic yards of sweepings

BMP: Winter Road Maintenance Program

A winter road maintenance program is in formation. The town has begun to implement the use of treated salt to increase effectiveness and explore the development of a brine distribution vehicle and investigate ground speed controls.

BMP: Permittee Owned Facilities Inventory

The permittee-owned facilities inventory will be completed during year 4.

BMP: O&M Programs And Procedures For Permittee-Owned Properties

the inventory and operation and maintenance (O&M) program and procedures will be completed during year 4.

BMP: Permittee Owned Treatment Structures

There are no treatment structures on town-owned property.

BMP: SWPPP (due year 3)

Deferred due to COVID19 Pandemic and staff changes.

BMP: Stormwater Treatment Structures Inspection and Maintenance Procedures

The existing stormwater treatment facilities consist of leaching catch basins employed to reduce runoff and discharges into waterway. Each year these basins are inspected and cleaned as necessary.

TMDL's and Water Quality Limited Waters

Raymond will use the pollutant loading analysis conducted by the Seacoast Stormwater Coalition to help prioritize outfalls and identify potential locations for BMPs for reduction in pollutants identified under an existing TMDL (Raymond town beach for bacteria, and Governors Lake for phosphorus) or water quality limited waters.

Bacteria/Pathogens

Outfalls to these receiving waters have not yet been ranked. Deferred due to COVID19 Pandemic and staffing changes.

Phosphorus

Outfalls to these receiving waters have not yet been ranked. Deferred due to COVID19 Pandemic and staffing changes.

Nitrogen

Outfalls to these receiving waters have not yet been ranked. Deferred due to COVID19 Pandemic and staffing changes.

Solids, Oil and Grease (Hydrocarbons), or Metals

Outfalls to these receiving waters have not yet been ranked. Deferred due to COVID19 Pandemic and staffing changes.

Chloride

Outfalls to these receiving waters have not yet been ranked. Deferred due to COVID19 Pandemic and staffing changes.

Activities for the Next Reporting Cycle

Raymond has retained Rockingham Planning Commission and Weston & Sampson to provide consulting services to assist the Town in implementing the MS4 requirements not completed in Year 2 and 3 (due to COVID 19 and staffing changes) and to facilitate those requirements due in Year 4.

Communication Outreach Strategy

Development Concepts

Situation

Municipalities utilize a wide array of communication strategies to communicate with residents ranging from official announcements at public meetings, exploiting the community cable program, electronic mailing list, Town web page, banners, printed flyers, posters and the use of reverse 911 (Code Red). However, these methods are often passive approaches to communication (meaning people need to look for it on the internet or other mediums) or heavily reliant on the individual's use of electronic forms of communication.

Working Group Planning Process

Communication Working Group: To best address this issue, it is recommended a working group to develop a multi-pronged strategy to address the communication shortfalls and ensure the Town has done its best to reach all residents possible. It is further recommended the working group use the following desired end states (outcomes) to help focus the communication strategy:

1) Bridge the Technology Gap to Facilitate Communication to All Residents: In New Hampshire Towns utilize electronic platforms heavily to communicate changes in Town operations. However, a lack of any reliable and routine nontechnology format mode of communication (paper distribution) has created a gap in communication efforts to those who do not rely or use electronic mediums, especially senior citizens in the community.

2) Know Your People: Identify Demographic Profiles & Focus Efforts on Widest Disseminations: All communities are made up of multiple clusters of demographic profiles who share similar social patterns across an array of municipal functions and activities. It is advisable to evaluate the types of demographics in the community to ensure communications strategies do not unintentionally oversaturate one demographic and under inform another. It is recommended the working group identify the demographic profiles of the community and then pair these profiles with the communication platforms selected to ensure the widest contact of residents.

Examples of typical community demographic profiles are:

- Individuals with children in public schools
 - Easiest to communicate with
- Individuals without children in public schools
- Individuals with children in youth activities
- Individuals who have limited community involvement
- Individuals who are actively involved in community
- Individuals who do not utilize electronic communication platforms

- Individuals who are residents but domicile in other areas seasonally

Concept Explanation: If a working group develops a strategy with the following actions items:

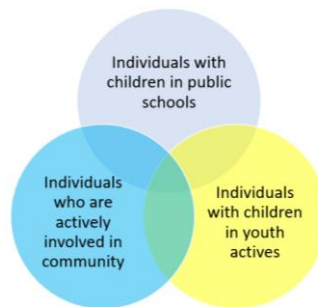
- Booth at youth sport activities
- Booth at Town recreation events
- School e-mail distribution list
- Flyers sent home with school children

Even though this is a lot of activity; these efforts realistically only hit a segment of the demographic who have school age children in public schools. Strategies would need to be in place to communicate with the other demographic profile groups.

A hyper focused communication strategy without evaluating the demographic can dimension the overall success of a communication effort because it consumes limited effort, time, funds, and resources on only a segment of the population.

It is also important to note individuals most likely will cross over between profiles. This cross over can either enhance communications efforts or be a barrier.

Concept Explanation: If a member of the community belonged to the following three Demographic Profiles then would be an overlap of communication opportunities:



Conversely: If a member of the community belonged to the following three Demographic Profiles then would be a barrier to communication opportunities:



Note: The group can further enhance the effectiveness of the communication strategy by further isolating subgroups under each demographic profile to develop focused micro strategies.

3) Evaluate Current Mediums to Ensure They Exploited to Their Potential: In addition to the electronic platforms, it is also import communities evaluate all of those platforms utilized (and those not available and not utilized) to ensure these fullest exploitation of already existing/organic capabilities, opportunities or platforms across the entire municipality (Town and School).

Examples:

- a) Marquees or Banners at high volume community areas (i.e. transfer station, town hall, schools)
- b) Distribute flyers/pamphlets municipal and school service counters
- c) Partner with local business to help distribute information (banners or flyers)
- d) Exploitation of Public Access Channel
- e) Town/School social media and websites

4) Capture Synergy Between Other Town Efforts to Enhance Communication: In addition to traditional and current communication mediums and platforms, the working group is tasked with evaluation other opportunities for communication provided by other Town activities.

Examples:

- f) “Piggybacking” on School and Town required mailing documents to distribute flyers (if allowed by law)
- g) Community announcements read by each Chairperson at all public meetings (School and Town)
- h) Information Booths at recreation events, official functions, and voting day (would require a calendar review of all upcoming Town and School events)

Note: It is recommended a legal review be conducted prior to including information in annual tax bills.

RSA 76:11-a Information. III. states “*A town or city may, by majority vote of its governing body, include information additional to that required under paragraphs I and II on the tax bill as a means of further educating the public relative to the laws regarding property taxes.*” Although this action is not specifically excluded, the fact the law addresses this matter specifying “*...educating the public relative to the laws regarding property taxes.*” may indicate it is not an allowable practice.

5) Determine Funds Available and Meet Budgetary Goals/Restrictions: A critical element of these efforts is to ensure all direct cost of this effort does not exceed the budgetary limit or additional restrictions set by the Select Board. However, the most effective communication strategy may require actions that do cost funding. It may be best for the working group to determine what actions or platforms require funding and would best enhance communication objectives.

Examples:

- i) Direct mail to residents
- j) Purchase of Banners
- k) Advertisements

6) Avoid Impacts that Could Diminish the Efficacy of Other Formats: It is important as strategies are developed, they do not unintentionally diminish the efficacy, credibility or reliability of the medium, platform or format.

Example: Overusing Reverse 911 for non-emergency purposes in a manner that would cause people to dismiss the platform during an emergency event.

7) Categorize Passive or Active Platforms: It may be helpful to evaluate the appropriateness for the use of active or passive communications.

Clarification:

Active Communications is a direct effort by the Town to communicate with a specified person or group of people through focused communication that does not require the receiver to take efforts to obtain (i.e. direct mailing, phone calls, reverse 911...).

Passive Communication are those efforts by the Town to widely broadcast communication to residents. The success of receiving the information from passive communication is directly linked to the actions of the receiver (resident) (i.e. posting on the town web page, banners, posters, local public access). These are passive because these forms of communication require the receiver to take action to receive the communication such as searching a website or passing by a poster or banner.