

**New Hampshire Small MS4 General
Permit**

Annual Report

Town of Exeter

Permit Year 2

Reporting Period: July 1, 2019 to June 30, 2020

EPA NPDES Permit Number: NHR041007

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	<input type="text" value="Russell Dean"/>
Title	<input type="text" value="Town Manager"/>
Signature	<input type="text" value="Handwritten Signature"/>
Date	<input type="text" value="9/28/2020"/>

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Small MS4 Authorization

The following annual report is intended to document on the activities undertaken over the reporting period from July 1, 2019 – June 30, 2020 in accordance with the Notice of Intent (NOI). The NOI can be found at the following (document name or web address):

<https://www3.epa.gov/region1/npdes/stormwater/nh/tms4noi/exeter.pdf>

Compliance activities have been identified and described in the Town of Exeter’s Stormwater Management Program (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. These documents can be found at the following (document name or web address) and will be referred to throughout this report:

SWMP:

https://www.exeternh.gov/sites/default/files/fileattachments/public_works/page/38331/2019.06_exeternh_swmp.pdf

IDDE Plan: Located at the Exeter Department of Public Works – 13 Newfields Road

MCM 1 - PUBLIC EDUCATION AND OUTREACH

BMP 1: Pet Waste Brochures/Pamphlets

Document Name and/or Web Address:

"Every Drop" postcards or flyer <https://stateofourestuaries.org/everydrop/every-drop-matters/for-towns/>

See Attachments for BMP 1

See Attachment for Facebook Post "Lifetime Post Total Reach"

See Attachment for Additional Public Participation

Description:

Distribution and promotion of "Every Drop" postcards or flyer with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include a pledge to pick up pet waste to be made available during dog registration and other events or venues (veterinarians, dog training, groomers, etc.). Every Drop is a collaborative education effort with PREP, NHDES, and other partners.

In Permit Year 2, the Town continued to use the same "Every Drop" flyer as in Permit Year 1. Flyers were made available at the Town Clerk and DPW offices. It was also shared via social media on DPW Facebook page and the Think Blue Exeter website. A "Think Blue: Pet Waste" poster, which included the "Every Drop" QR code and website, was displayed at the regional Household Hazardous (HHW) Collection event to be viewed by the people waiting to drop off their waste. There were 181 households from Exeter who attended the HHW event and are assumed to have seen the poster. See Attachment for Additional Public Participation for a copy of the Pet Waste poster displayed at the HHW event. One person from Exeter signed the "Every Drop" pledge in Permit Year 2 (<https://stateofourestuaries.org/everydrop/petpledge/>). As an additional method to assess the measurable goal, the "Lifetime Post Total Reach" for social media posts in Permit Year 2 related to BMP 1 was tallied. The two Pet Waste posts had a "Lifetime Post Total Reach" of 867.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

Dog owners and/or dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste. For additional information, refer to: https://www4.des.state.nh.us/nh-ms4/?page_id=54, "Minimum Control Measure 1: Public Outreach and Education".

Message Date:

Annually in spring and throughout the permit year

BMP 2: Clean Water/Healthy Lawns Brochures/Pamphlets

Document Name and/or Web Address:

5 Easy Steps “Healthy Lawns – Clean Water”: <https://www.exeternh.gov/bcc/exeters-healthy-lawns-clean-water-initiative>

Facebook Page: <https://www.facebook.com/exeterhealthylawns-cleanwater/>

See Attachment for BMP 2

See Attachment for Facebook Post “Lifetime Post Total Reach”

Description:

Distribute Clean Water/Healthy Lawns information. The following is a summary of Healthy Lawns Clean Water efforts in Permit Year 2:

- Healthy Lawns Clean Water magnets were made available at the Town Clerk’s office. A minimum of 50 magnets were picked up by residents.
- Healthy Lawns Clean Water magnets (9) were distributed with rain barrel purchases.
- Twelve rain barrels were sold to nine individual homes.
- The Healthy Lawns Clean Water Facebook page has 146 likes and 156 followers, as of September of 2020.
- The Healthy Lawns Clean Water Facebook page continued to post new content.
- Content from the Healthy Lawns Clean Water Facebook page was shared to the DPW Facebook page.

The Town continued engagement on social media and continued interest in rain barrels through sales. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for social media posts in Permit Year 2 related to BMP 2 was tallied. The 15 Healthy Lawns Clean Water posts had a “Lifetime Post Total Reach” of 2,961.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

To see an increased awareness of proper fertilizer use.

Message Date:

Annually in the spring

BMP 3: Development Regulations Fact Sheet Brochures/Pamphlets

Document Name and/or Web Address:

https://www.exeternh.gov/sites/default/files/fileattachments/planning_board/page/14051/withcover2019_for_spr_app.pdf

Description:

Distribute Regulations Fact Sheet to developers when they inquire about new land development projects. In Permit Year 2, the Town decided to rely on the checklist in the Planning Board applications for outreach to developers rather than distributing a separate

regulations fact sheet. This approach was discussed and reviewed with NHDES. There were 16 Planning Board applications submitted during Permit Year 2.

Targeted Audience:

Developers

Measurable Goal(s): To see an increased awareness of the local, state, and federal stormwater regulations.

Message Date:

Permit Year 2

BMP 4: Advertise Green SnoPro Certification Website

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 3.

BMP 5: Septic Smart Displays/Posters/Kiosks

Document Name and/or Web Address:

Think Blue Exeter: <https://www.exeternh.gov/bcc/think-blue-septic-system-maintenance>

See Attachment for BMP 3

See Attachment for Facebook Post “Lifetime Post Total Reach”

See Attachment for Additional Public Participation

Description:

Utilize Septic Smart posters to encourage residents to inspect and maintain their septic systems each year. In Permit Year 2, the Septic Smart posters were displayed at the Town Office and Exeter Public Library from September 16 through September 20, 2019. Additionally, the Town posted information during Septic Smart week on the DPW Facebook page, and the Think Blue Exeter website includes a septic system maintenance page with similar information. A Septic Smart poster was also displayed at the regional HHW Collection event to be viewed by the people waiting to drop off their waste. There were 181 households from Exeter who attended the HHW event and are assumed to have seen the poster. See Attachment for Additional Public Participation for a copy of the Septic Smart poster displayed at the HHW event. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for social media posts in Permit Year 2 related to BMP 5 was tallied. The 13 Septic System posts had a “Lifetime Post Total Reach” of 9,086.

Targeted Audience:

Residents with septic systems

Measurable Goal(s):

To see an increase in septic system testing/maintenance.

Message Date:

Annually in the fall during Septic Smart week.

BMP 6: Leaf and Yard Waste Collection

Document Name and/or Web Address:

See Attachment for BMP 6

See Attachment for Facebook Post “Lifetime Post Total Reach”

See Attachment for Additional Public Participation

Description:

Post notices of leaf and yard waste collection. In Permit Year 2, notices were posted on the town’s website and Facebook pages (DPW and Town of Exeter) as well as in the Exeter News-Letter and at the Town Office in the Fall of 2019 and Spring of 2020. A poster was also displayed at the regional HHW Collection event to be viewed by the people waiting to drop off their waste. There were 181 households from Exeter who attended the HHW event and are assumed to have seen the poster. See Attachment for Additional Public Participation for a copy of the Leaf Pick-up poster displayed at the HHW event. A Yard Waste poster will be displayed at the HHW event in Permit Year 3 that also includes information on the importance of proper disposal of leaf and yard waste.

Residents are allowed to leave up to 12 bags of leaf litter at the curb for collection every spring and fall as well as drop off leaf and yard waste at the transfer station. On a calendar year basis, the total estimated volume of yard waste collected is 600 cubic yards. The amount has been around the same each year. As a method to assess the measurable goal, the “Lifetime Post Total Reach” for social media posts in Permit Year 2 related to BMP 6 was tallied. The 13 Leaf/Yard Waste posts had a “Lifetime Post Total Reach” of 8,044.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

To see an increase in the disposal of leaf and yard waste at the transfer station.

Message Date:

Annually in the spring and fall

BMP 7: Exeter Conservation Commission’s Guest Speaker Night

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

Additional Conservation Commission events held in Permit Year 2 included the Exeter Conservation Commission and the Rockingham Planning Commission (RPC) hosted the Exeter Water Trail Tour on August 13, 2019. The event was open to the public and well-advertised; however, only four members of the Conservation Commission and a member of the RPC attended. The Conservation Commission also hosted a full moon snowshoe walk on the Irvine conservation property on February 8, 2020, and talked about the importance of conservation of this land for Squamscott River shoreline protection. The

snowshoe event had 42 registrants. See Attachment for BMP 7 and Attachment for Facebook Post “Lifetime Post Total Reach” for additional information.

BMP 8: Stormwater Pollution Prevention for Industrial Sites Flyer

Deliverables will progress in accordance with the accepted NOI and are scheduled for Permit Year 5.

Additional Public Education and Outreach

The Town aired several water quality/pollution prevention themed Public Service announcements on their local cable channel throughout Permit Year 2. The Public Service announcements can be viewed on-demand on the Town’s website: https://videoplayer.telvue.com/player/LyAOBTaTsmn_CnwjwcB5-VoxQtyoKR1P/categories/1750?autostart=false&showtabssearch=true (see Attachment for Additional Public Education and Outreach)

The following is a list of water quality/pollution prevention themed videos that aired on the local cable access channel and the number of times they were played during Permit Year 2:

- How to Build a Rain Garden – 11 plays
- Pollution Prevention 101 – 48 plays
- Instream Flow Program: Water for People and Wildlife – 2 plays
- Instream Flow NHDES videos – 23 plays
- What is pollution prevention – 3 plays

Septic Smart videos, which support BMP 5, will be added to the rotation of Public Service announcements in Permit Year 3.

The Exeter Water Trail, which is open to the public, is an educational installation on the campuses of Main Street and Lincoln Street Elementary Schools. The signage includes topics dealing with stormwater runoff, water quality, flooding, watersheds, and the water cycle. Curriculum materials for the Water Trail are available to teachers at the Main Street and Lincoln Street Elementary Schools as optional curriculum.

MCM 2 - PUBLIC PARTICIPATION

BMP 9: Public Review of Stormwater Management Program (SWMP)

The Town of Exeter’s Stormwater Management Program (SWMP) is available to the public for review on the Town’s website or at the Public Works office during regular business hours. See Attachment for BMP 9 & 10.

BMP 10: Public Participation in SWMP Development

The public is encouraged to submit written comments on the SWMP. Instructions on how to do this (email address provided of where to submit comments) was added to the Town’s Stormwater website on September 24, 2019. See Attachment for BMP 9 & 10.

BMP 11: Shoreline/Waterbody

No spring clean-ups were held as a result of COVID-19 in 2020. The Public Works promoted the Great Bay National Wildlife Refuge Shoreline Clean-Up that was held on September 29, 2019, on their Facebook page. Additionally, the Exeter-Squamscott River Local Advisory Committee (ESRLAC) continued their role of plan reviews along designated waterbodies. The ESRLAC is made up of citizen volunteers living in towns within the watershed, including two representatives from the Town of Exeter. They created a Facebook page with 235 followers.

Additional Public Participation

A regional Household Hazardous Waste (HHW) Collection event was held at the Exeter Public Works Garage on October 19, 2019. Participation from Exeter residents increased from the previous year with 181 households participating (up from 167 in 2018). Posters were displayed at the HHW Collection event to promote BMP 1 (Pet Waste Brochures/Pamphlets), BMP 5 (Septic Smart Displays/Posters/Kiosks), and BMP 6 (Leaf and Yard Waste Collection). See Attachment for Additional Public Participation for a report on the HHW Collection event as well as the posters to promote BMPs 1, 5, and 6.

MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

BMP 12: Sanitary Sewer Overflow (SSO) Inventory

There were four SSOs identified in Permit Year 2. All were reported to EPA and other government agencies, as required. The list of SSOs is available at: <https://www.exeternh.gov/publicworks/combined-sewer-sanitary-sewer-overflows>.

BMP 13: Storm Sewer System Map

Phase 1 mapping of all known stormwater infrastructure has been completed. The map is continually updated as new information is available, and is in progress in accordance with the accepted NOI.

BMP 14: Written IDDE Program Development

A written IDDE plan has been developed. The IDDE plan was reviewed and updated in Permit Year 2.

BMP 15: Implement IDDE Program

An initial outfall inventory and priority ranking has been completed and included in the IDDE plan. The development of written catchment investigation procedures was completed in Permit Year 2. During Permit Year 2, one illicit discharge was reported to DPW by the Building Inspector on February 27, 2020 (date of incident was February 26, 2020). The illicit discharge was a transitory (one-time) event resulting from flushing of a fire sprinkler line in a parking garage at the Squamscott Block building. The discharge contained very stagnant water and a small amount of glycerin glycol. The material was discharged into the street. The Highway Department responded the same day the incident was reported and cleaned the materials using absorbent materials and shovels. No formal enforcement action was required; however, the sprinkler company and owner were informed this was not acceptable.

Additionally, during smoke testing at a privately-owned mobile home park, the Town discovered an overflow pipe at a private sewer pump station that discharges to a private ditch. The Sewer Department is working with the owners to get the problem corrected.

BMP 16: Implement Employee Training

The City of Dover and UNH provided Illicit Discharge videos prepared by senior civil and environmental engineering students at the Seacoast Stormwater Coalition meeting on June 17, 2020. No additional training was held in Permit Year 2 as a result of COVID-19; however, an IDDE training was held on September 22, 2020 (Permit Year 3) at the Dover DPW Complex. The training was for the Town of Exeter Water & Sewer and Highway Department managers and foremen and hosted by UNH and City of Dover.

BMP 17: Conduct Dry Weather Screening

No dry weather screening was conducted in Permit Year 2. Dry weather screening will progress in accordance with the accepted NOI and is scheduled to begin in Permit Year 3.

BMP 18: Conduct Wet Weather Screening

No wet weather screening was conducted in Permit Year 2. Wet weather screening will progress in accordance with the accepted NOI and is scheduled to begin in Permit Year 3.

BMP 19: Ongoing Screening

Ongoing screening will progress in accordance with the accepted NOI (upon completion of the IDDE program).

BMP 20: IDDE Regulations

The existing Storm Drainage Ordinance prevents illegal discharges to the drainage system, with fines. The ordinance has been reviewed and did not require modification for compliance with the 2017 NH Small MS4 General Permit. **This BMP has been achieved.**

MCM4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

BMP 21: Sediment and Erosion Control Ordinance

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations as a regulatory mechanism to require the use of sediment and erosion control practices at construction sites. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. **This BMP has been achieved.**

BMP 22: Site Plan Review Procedures

The Town of Exeter relies on the Site Plan Review and Subdivision Regulations, which outline the site plan review procedures. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small

MS4 General Permit. During Permit Year 2, eight Site Plan Review and eight Subdivision Applications were received by the Planning Department and reviewed by the Technical Review Committee.

BMP 23: Procedures for Site Inspection and Enforcement of Erosion and Sediment Control Measures

The Town of Exeter contracts with a local engineering firm to perform site inspections of erosion and sediment control measures during construction. Written site plan review and construction site inspection and enforcement procedures were developed and included in Appendix 4.1 of the Town's SWMP.

The Town of Exeter conducts construction site inspections on all projects that get Planning Board approval, and since the trigger for Planning Board approval is less than an acre, the Town does not track the number of sites greater than an acre, rather they track and inspect all projects that required Planning Board approval. During Permit Year 2, nine sites were inspected with approximately 35 inspections completed per site (weekly inspections are typical during the construction season of April through November). The total number of inspections is approximately 315. No formal enforcement action was needed; deficiencies noted were brought to the attention of the contractor during the site visit and corrected by the contractor.

BMP 24: Construction and Site Waste Controls

The Town of Exeter incorporated requirements for construction operators to control onsite wastes into the Site Plan Review and Subdivision Regulations, which were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. **This BMP has been achieved.**

MCM5 – POST CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

BMP 25: Post-Construction Ordinance

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations as a regulatory mechanism to address post-construction stormwater management. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. **This BMP has been achieved.**

BMP 26: Street Design and Parking Lot Guidance Report

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 27: Green Infrastructure Report

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 28: List of Municipal Retrofit Opportunities

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 29: As-built Plans for On-site Stormwater Controls

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations for procedures to require submission of as-built plans from private development projects. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. **This BMP has been achieved.**

MCM6 – GOOD HOUSEKEEPING AND POLLUTION PREVENTION FOR PERMITTEE OWNED OPERATIONS

BMP 30: Parks and Open Spaces Operations and Maintenance (O&M) Procedures

Written Parks and Open spaces O&M procedures were developed and included in Appendix 6.1 of the Town’s SWMP.

BMP 31: Buildings and Facilities Operations and Maintenance (O&M) Procedures

Written Buildings and Facilities O&M procedures were developed and included in Appendix 6.1 of the Town’s SWMP.

BMP 32: Vehicles and Equipment Operations and Maintenance (O&M) Procedures

Written Vehicles and Equipment O&M procedures were developed and included in Appendix 6.1 of the Town’s SWMP.

BMP 33: Inventory Town-owned Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

An inventory of town-owned parks and open spaces, buildings and facilities, and vehicles and equipment was developed and included in Appendix 6.1 of the Town’s SWMP.

BMP 34: Infrastructure Operations and Maintenance (O&M) Procedures

Written infrastructure O&M procedures were developed and included in Appendix 6.1 of the Town’s SWMP.

BMP 35: Catch Basin Cleaning Program

The current schedule for catch basin cleaning is to clean approximately half of the catch basins each year. Data collected from catch basin cleaning efforts are being used to identify catch basins that are more than 50% full for increased cleaning; however, progress on the development of the catch basin cleaning optimization program has been delayed due to staff/budget cuts as a result of the COVID-19 pandemic. During Permit Year 2, catch basin cleaning was conducted August 7, 2019 to August 14, 2019, October 22 to October 24, 2019, and May 4 to May 13, 2020. Catch basin cleanings are stored at the Town sand pit to mix with compost and do not discharge to receiving waters. The following is a summary of catch basin cleaning completed during Permit Year 2:

Permit Year 2 Catch Basin Cleaning Summary	2019	2020
Total Town Maintained Catch Basins	1,732	1,732
Catch Basins Cleaned	455	444
Catch Basin Inspected	455	444
Total Sediment Removed (ft ³)	2,455	4,171

BMP 36: Street Sweeping Program

The Town of Exeter sweeps streets and municipally-owned parking lots several times per year. Sweeping occurs three to four days per week between April and October. During Permit Year 2, 917 lane-miles were swept and 1,080 cubic yards of material were removed. Street sweepings are stored at the Town sand pit to mix with compost and do not discharge to receiving waters.

BMP 37: Winter Road Maintenance Program

The Town of Exeter follows the guidance of the Green SnoPro certification for optimizing salt spreading operations. A winter road maintenance program has been established with a goal of reducing salt usage and included in Appendix 6.1 of the Town’s SWMP.

BMP 38: Stormwater Treatment Structures Inspection and Maintenance Procedures

Town operated treatment units are inspected and maintained annually. During Permit Year 2, water quality units were not cleaned as a result of a new contractor along with budget constraints due to COVID-19; however, the rain garden at the Founder’s Park was cleaned in the spring of 2020 and the Lincoln Street infiltration trench and media box filters were still under warranty and maintained by the construction contractor that installed them. Water quality units are scheduled to be cleaned in 2021. An inventory of municipally-owned or operated structural BMPs and written inspection and maintenance procedures were developed and included in Appendix 6.1 of the Town’s SWMP.

BMP 39: Stormwater Pollution Prevention Plan (SWPPP)

The existing Exeter DPW Complex SWPPP was updated in Permit Year 2 to fully incorporate the recent upgrades to the Wastewater Treatment Facility into the DPW Complex SWPPP.

A SWPPP evaluation was prepared for other town-owned facilities within the MS4, including Public Safety Complex and the Recreation Center Maintenance Garage. Based on the evaluation, it was determined that the existing SWPPPs for these two facilities be superseded by the O&M Procedures related to Buildings and Facilities and Vehicles and Equipment. The evaluation was included as Appendix 6.2 of the SWMP. The Town determined the Transfer Station is located outside of the MS4 Urbanized Area.

TMDLS AND WATER QUALITY LIMITED WATERS

Bacteria/Pathogens

Outfalls to these receiving waters will be ranked as high priority for the IDDE implementation when the initial outfall inventory and priority ranking is updated (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Bacteria/Pathogens, refer to BMPs 1 and 5.

Nitrogen

Outfalls to these receiving waters will be ranked as high priority for the IDDE implementation when the initial outfall inventory and priority ranking is updated (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Nitrogen, refer to BMPs 1, 2, 6, and 36.

The Town of Exeter through its participation in the Seacoast Stormwater Coalition and continued involvement with the NHDES led Pollutant Tracking and Accounting Pilot Project (PTAPP) will satisfy the tracking and accounting requirement of the municipally-owned structural BMPs listed in Attachment 1 to Appendix H. The PTAPP 2019 report is attached to the annual report (see Attachment for TMDL and Water Quality Limited Waters – Nitrogen).

Solids, Oil and Grease (Hydrocarbons), or Metals

Outfalls to these receiving waters will be ranked as high priority for the IDDE implementation when the initial outfall inventory and priority ranking is updated (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Solids, Oil and Grease (Hydrocarbons), or Metals, refer to BMPs 35 and 36.

DESCRIPTION OF ANY CHANGES IN IDENTIFIED BMPS OR MEASURABLE GOALS

The Town of Exeter has implemented activities in accordance with the approved NOI. All BMPs and measurable goals as outlined in the approved NOI are appropriate.

It should be noted that the description of BMP 1 was expanded with more detail as included in the annual report (Permit Year 1).

In Permit Year 2, BMP 3 Development Regulations Fact Sheet Brochures/Pamphlets was modified by relying on the Town's checklist in the Planning Board applications for outreach to developers rather than distributing a separate regulations fact sheet to developers.

ACTIVITIES FOR THE NEXT REPORTING PERIOD

The Town of Exeter will continue to implement activities in accordance with the approved NOI and as noted in the Annual Report.