

Year 5 Annual Report
New Hampshire Small MS4 General Permit
New Permittees
Reporting Period: July 1, 2022-June 30, 2023

Please DO NOT attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure any websites included on this form are to publicly accessible sites

Unless otherwise noted, all fields are required to be filled out. If a field is left blank, it will be assumed the requirement or task has not been completed. Please ONLY report on activities between July 1, 2022 and June 30, 2023 unless otherwise requested.

Part I: Contact Information

Name of Municipality or Organization:

EPA NPDES Permit Number:

Primary MS4 Program Manager Contact Information

Name:

Title:

Street Address Line 1:

Street Address Line 2:

City:

State:

Zip Code:

Email:

Phone Number:

Stormwater Management Program (SWMP) Information

SWMP Location (publicly available web address):

Date SWMP was Last Updated:

If the SWMP is not available on the web please provide the physical address:

Part II: Self-Assessment

First, in the box below, select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the most recent EPA approved Section 303(d) Impaired Waters List which can be found here: <https://www.epa.gov/tmdl/region-1-impaired-waters-and-303d-lists-state>

Impairment(s)

- ☒ Bacteria/Pathogens
 ☐ Chloride
 ☐ Nitrogen
 ☒ Phosphorus
☐ Solids/ Oil/ Grease (Hydrocarbons)/ Metals

TMDL(s)

- ☒ Bacteria and Pathogen
 ☐ Chloride
 ☐ Lake and Pond Phosphorus

Clear Impairments and TMDLs

Year 5 Requirements

- ☒ Completed Phase I of system mapping
☐ Developed a written catchment investigation procedure and added the procedure to the SWMP

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Wilton has begun professional catchment delineation with the assistance of Underwood Engineering, and has draft investigation procedures it is considering, but the procedures aren't fully adopted.

Next, check off all requirements below that have been completed. **By checking each box you are certifying that you have completed that permit requirement fully.** If you have not completed a requirement leave the box unchecked. Additional information will be requested in later sections.

Annual Requirements

- ☐ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements
☒ Kept records relating to the permit available for 5 years and made available to the public
☐ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented
 - ☐ This is not applicable because we do not have sanitary sewer
 - ☒ This is not applicable because we did not find any new SSOs
 - ☐ The updated SSO inventory is attached to the email submission
 - ☐ The updated SSO inventory can be found at the following publicly available website:

- ☒ Updated the outfall and interconnection inventory and priority ranking as necessary
 - ☐ The priority ranking of outfalls/interconnections is attached to the email submission
 - ☒ The priority ranking of outfalls/interconnections can be found at the following website:

https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Wilton%20Outfall%20and%20Interconnection%20Ranking%20%20-%20Asset%20Management%20Worksheet.xlsx

- ☒ Provided training to employees involved in IDDE program within the reporting period
- ☐ Properly stored and disposed of catch basin cleanings and street sweepings so they did not discharge to receiving waters
- ☒ All curbed roadways were swept at least once within the reporting period
- ☐ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- ☒ Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- ☒ Updated inventory of all permittee owned facilities as necessary
- ☒ O&M programs for all permittee owned facilities have been completed and updated as necessary
- ☐ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- ☒ Inspected all permittee owned treatment structures (excluding catch basins)

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

1. The Town's Select Board has offered numerous noticed meetings of stormwater program topic discussions in year 5, and regularly allow and invite public comment by custom, but the stormwater team couldn't schedule the formal public hearing review for the year 5 period until October 16th, 2023.

In conjunction with this, the Town of Wilton can report it believes its fully maintained its stormwater program records for the past 5 years and beyond.

2. The Town was unable to fully update its outfall priority ranking in year 5, but great progress has been made to the town's Stormwater Asset Management Program. The Town did conduct blanket sampling and outfall inspections in wet weather for above 80% of MS4 area outfalls, and is evaluating obtaining third party professional analysis of existing outfalls to better rank them more in keeping with common practices elsewhere.

3. A notification of regulatory changes relative to the definition and handling of potentially contaminated soils mean the town's traditional dirt storage location is technically in violation even though discharge to the MS4 is impossible or highly unlikely. This is because it is collected in piles uncovered at a dumping location at the Laurel Hill Cemetery. While direct, untreated discharge to the MS4 is unlikely or impossible due to geography and local drainage infrastructure, the new regulation requires temporary storage that is covered with appropriate site controls. Testing is then required to either dispose of the soil permanently or to reuse it. This is expected to be a burdensome change as the town's traditional management procedure for this material is extremely primitive relative to the cost and complexity of the expected tasks that have emerged.

4. The town's traditional salt storage facility is enclosed, but doesn't have a truly impermeable bottom or leak catch system, and will likely require retrofitting. The Town's Highway Garage and salt storage location is

located within the MS4 area and dates from the 1950s. The Town is currently exploring designing and building a new primary highway garage facility, and part of that would be redesigning salt, material, and potentially contaminated soil storage.

5. Implementation of O&M policies is partially implemented; regulations are in place, and inspections are occurring informally at a department by department facility basis, but the lack of appropriately trained and equipped facilities maintenance staff is currently an obstacle for some specialty requirements, and specialty contractors able to perform some work safely (such as gutter maintenance on the town's tallest facilities) was unable to be procured in year 5 for some facilities.

Bacteria/ Pathogens (Combination of Impaired Waters Requirements and TMDL Requirements as Applicable)

Annual Requirements

*Public Education and Outreach**

- ☒ Annual message was distributed encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Permittee or its agents disseminated educational material to dog owners at the time of issuance or renewal of dog license, or other appropriate time
- ☒ Provided information to owners of septic systems about proper maintenance in any catchment that discharges to a water body impaired for bacteria

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

Phosphorus Impairment

Annual Requirements

*Public Education and Outreach**

- ☒ Distributed an annual message in the spring (April/May) encouraging the proper use and disposal of grass clippings and encouraging the proper use of slow-release and phosphorus-free fertilizers
- ☒ Distributed an annual message in the summer (June/July) encouraging the proper management of pet waste, including noting any existing ordinances where appropriate
- ☒ Distributed an annual message in the fall (August/September/October) encouraging the proper disposal of leaf litter

** Public education messages can be combined with other public education requirements as applicable (see Appendix H and F for more information)*

Good Housekeeping and Pollution Prevention for Permittee Owned Operations

- ☐ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.a.iii.(c) to a minimum of two times per year (spring and fall)

Potential structural BMPs

- Any structural BMPs already existing or installed in the regulated area by the permittee or its agents was tracked and the phosphorus removal by the BMP was estimated consistent with Attachment 3 to Appendix F. The BMP type, total area treated by the BMP, the design storage volume of the BMP and the estimated phosphorus removed in mass per year by the BMP were documented.

- ☒ No BMPs were installed
- ☐ The BMP information is attached to the email submission
- ☐ The BMP information can be found at the following website:

Total estimated phosphorus removed in **lbs/year** from the installed BMPs:

Optional: If you would like to describe progress made on any incomplete requirements listed above or provide any additional details, please use the box below:

The Town's been distributing material and messages for phosphorous control measures before the Wilton MS4 Area was assigned a phosphorous impairment in Year 4. However, the further requirements of the impairment weren't metabolized until Spring/Summer of Year 5, and all anticipated mandatory procedures haven't been integrated yet. Currently, the town sweeps MS4 streets once per year in the Spring, and similarly clears catch basins and some site specific BMPs once per year in the fall. Doing BMP cleaning and sweeping more frequently currently is assessed as a massive expense for the town that is unlikely to actually help much due to the quantity of material actually collected (street sweeping has historically in Wilton been deemed unnecessary until a full year and a new winter season has passed, likewise, catch basin and facility BMP cleaning is currently assessed as not worthwhile ((e.g. far sub 50% catch basin filling after a full year)). Instead, the Town plans to execute a leaf collection program at the town's recycling center starting in fall 2023. These efforts, in addition to once a year catch basin cleaning and street sweeping, are believed to be able to bring the town into compliance.

Optional: Use the box below to provide any additional information you would like to share as part of your self-assessment:

In April 2023, Wilton's stormwater program attended the resurgent Souhegan Sustainability Fair. The stormwater manager spoke to residents and property owners in the Town of Wilton and visitors from neighboring communities in NH or even other states, about the MS4 Stormwater Permit, its obligations, and extensively about the different programs the town and state sponsors to reduce impaired waterway pollution. The phosphorous impairment, including leaf clean up brochures, was integrated into the conversations had with 45 individuals and the 18 separate MS4 program packets distributed.

Part III: Receiving Waters/Impaired Waters/TMDL

Have you made any changes to your lists of receiving waters, outfalls, or impairments since the NOI was submitted?

☒ Yes

☐ No

If yes, describe below, including any relevant impairments or TMDLs:

In the late Year 4 and early Year 5 reporting periods, the town discovered issues with the waterbodies and impairments reported in the state-provided lists. After meeting and discussing these issues initially with state stormwater liaisons, it was discovered that the town actually did not actually qualify for listed metals impairment, but that the town did confirm it technically appropriately pick up a phosphorous impairment associated with NHRIV700060902-05 SOUHEGAN RIVER - TUCKER BROOK.

Part IV: Minimum Control Measures

Please fill out all of the metrics below. If applicable, include in the description who completed the task if completed by a third party.

MCM1: Public Education

Number of educational messages completed **during this reporting period:** 4

Below, report on the educational messages completed **during this reporting period**. For the measurable goal(s) please describe the method/measures used to assess the overall effectiveness of the educational program.

BMP:[Scoop the Poop]

Message Description and Distribution Method:

Stormwater Education Distribution Page "Education": <https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=14304560>

Program webpage: https://www.wiltonnh.gov/government/stormwater_management/get_the_scoop_on_poop_

Draft Flyer: https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Draft%20Scoop%20the%20Poop%20Flyer.pdf

Greenworks Flyer: https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Greenworks%20Scoop%20the%20Poop%20Flyer.pdf

Physical distribution of draft flyers at Town Clerk's Office and Souhegan Sustainability Fair

Targeted Audience: Residents

Responsible Department/Parties: Town Manager/Mayor's Office

Measurable Goal(s):

Public made aware of the impacts of pet and animal waste on impaired waterways.

Message Date(s): Year Round; Program web page updated in April 2023 ; draft flyer and Greenworks Flyer created and adopted respectively in April 2023 for Souhegan Sustainability Fair

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☒ No ☐

If yes, describe why the change was made:

Wilton's Town Clerk's office has been reluctant to distribute "Scoop the Poop" materials directly during dog licensing time, but draft program flyers and a Greenworks Flyer were passively stored and displayed at the Town Clerk's office and Land use / Building Inspector's Office, and distributed physically at the Souhegan Sustainability Fair in April 2023. Previously, passive program participation had been encouraged merely through the town website or promoted with signage or as part of town parks management.

BMP:[Get Pumped]

Message Description and Distribution Method:

Stormwater Education Distribution Page "Education" : <https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=14304560>

Program webpage(s): <https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=15534337>

Linked external program page: <https://getpumpednh.com/>

Distributed Brochure: https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Get%20Pumped%20Brochure.pdf

Targeted Audience: Residents, Industrial facilities, Businesses, institutions and commercial facilities

Responsible Department/Parties: Town Manager/Mayor's Office

Measurable Goal(s):

Public is made aware of septic system maintenance and the potential impacts of septic failure on impaired waterways.

Message Date(s): Year Round; program web page updated in September 2023; updated flyer distributed starting April 2023 in Town Clerk's Office, Land Use / Building Inspector's Office, and at Souhegan Sustainability Fair

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP:[Green Grass Clear Water]**Message Description and Distribution Method:**

Stormwater Education Distribution Page "Education" : <https://www.wiltonnh.gov/cms/One.aspx?portalId=13599924&pageId=14304560>

Program Page: <https://www.wiltonnh.gov/cms/one.aspx?portalId=13599924&pageId=16918869>

Gardening External web page: <https://extension.unh.edu/blog/water-conservation-fundamentals-gardening-and-landscaping>

Grass Clippings Disposal Instructions Video: <https://youtu.be/FuwdH0Ry1fo>

Fertilizer External web page / fact sheet: <https://extension.unh.edu/resource/calculating-lawn-fertilizer-rates-fact-sheet>

Green Grass and Clean Water 2023 Fact Sheet: https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Green%20Grass%20Clear%20Water%20Flyer%202023.pdf

Fertilizer Flyer: https://extension.unh.edu/sites/default/files/migrated_unmanaged_files/Resource007374_Rep10613.pdf

Wilton Rake it or Leave it Flyer: https://www.wiltonnh.gov/UserFiles/Servers/Server_13599840/File/Government/MS4%20Stormwater/Wilton%20MS4%20Brochure%20-%20Leaves%20and%20Yard%20Waste%202022.pdf

Targeted Audience: Businesses, institutions, commercial facilities, industrial facilities, residents, and develop

Responsible Department/Parties: Town Manager/Mayor's Office

Measurable Goal(s):

Inform the public about the management of plant life and soil on impaired waterways.

Message Date(s): Year round; program web page updated in April 2023; updated flyers and fact sheets adopted and distributed starting April 2023 in Town Clerk's Office, Land Use / Building Inspector's Office, and at Souhegan Sustainability Fair

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

BMP:[Industrial Outreach Letters]

Message Description and Distribution Method:

Sent outreach form letters and "Industrial Outreach Fact Sheet" "Green Snow Pro fact Sheet" to 27 industrial facility operators or owners within the town's MS4 area or in adjacent and/or potentially influencing areas. Letters can be found: https://www.wiltonnh.gov/government/stormwater_management under "education"

Targeted Audience: Industrial facilities

Responsible Department/Parties: Town Manager/Mayor's Office

Measurable Goal(s):

Industrial facility operators in Wilton are informed about various requirements of the MS4 Permit. Send letters to the 27 current owner/operators identified as potentially significant.

Message Date(s): September 15th 2023

Message Completed for: Appendix F Requirements ☒ Appendix H Requirements ☒

Was this message different than what was proposed in your NOI? Yes ☐ No ☒

If yes, describe why the change was made:

Add an Educational Message

MCM2: Public Participation

Describe the opportunity provided for public involvement in the development of the Stormwater Management Program (SWMP) **during this reporting period:**

The Wilton Select Board at various points throughout the reporting period posted discussions about stormwater management topics, and spoke publicly about the activities that compose operating the town's stormwater programs and policies as part of work sessions and regular meetings throughout year 5. Residents are encouraged to report suspected municipal stormwater violations to town employees and officials, and similarly the public is invited to comment at public input sessions about stormwater program discussions. The town's formal year 5 annual stormwater program review meeting was delayed out of year 5 and rescheduled until October 16th, 2023 due to managing staff and Select Board workloads.

Was this opportunity different than what was proposed in your NOI? Yes ☐ No ☒

Describe any other public involvement or participation opportunities conducted **during this reporting period:**

1. The volunteer-run and lead Wilton Town-Wide Clean-up once again achieved massive success by organizing scores of volunteers in April 2023 to clean roadways within Wilton and Wilton Town properties: Again, over 68 miles of town roadways were cumulatively tracked and cleaned up by way of trash collection. This was achieved by organizing volunteer groups to cover various roadways within Wilton, and collect trash and recyclables by hand through donated trash bags, that were then disposed of free of charge at the Wilton Recycling Center. Due to lack of volunteer-level tracking, and absent a more sophisticated tracking system at the recycling center, the number of bags and volume of waste removed wasn't recorded, but it was substantial (hundreds of trash bags worth of material).
2. The Souhegan Sustainability Fair, after a hiatus due to the pandemic, once again returned in April 2023, and the Wilton Stormwater Program participated at the nearly all-day event: The stormwater manager and staff arranged to reserve a "booth" space with organizers, and set up a table displaying the Wilton Stormwater Program's entire trove of updated informational materials. What's more, the stormwater manager stayed until approximately from 9AM to 3:30 PM, and spoke to approximately 45 separate individuals about MS4 Regulation, the benefits and effects of storm water management, and how every household can help contribute to cleaning up the town's impaired waterways. Around 29 of those who spoke to the storm water manager were Wilton residents, while 11 were from neighboring New Hampshire communities, and the remaining were either from farther away in New Hampshire or were visitors from out of state. The Storm water manager also distributed approximately 18 separate packets of informational flyers for some of the town and state's storm water management programs (See website for flyer/fact sheet copies; Get Pumped! Green Grass Clear Water, and Scoop the Poop). Approximately 24 other MS4 informational promotional documents or products were also distributed.
3. The Wilton Stormwater Manager reached out to the Friends of the Souhegan regarding cooperating more closely on Wilton MS4 waterway testing and cooperated with the regional SorLAC entity on investigating potential MS4 stormwater or other waterway environmental violations during year 5. This resulted in one code enforcement action that is bringing a potential future MS4 violator into compliance.

MCM3: Illicit Discharge Detection and Elimination (IDDE)

Sanitary Sewer Overflows (SSOs)

Check off the box below if the statement is true.

- ☐ This SSO section is NOT applicable because we DO NOT have sanitary sewer

*Below, report on the number of SSOs identified in the MS4 system and removed **during this reporting period**.*

Number of SSOs identified:

Number of SSOs removed:

MS4 System Mapping

Below, check all that apply.

The following elements of the Phase I map have been completed:

- ☒ Outfalls and receiving waters
- ☒ Open channel conveyances
- ☒ Interconnections
- ☒ Municipally-owned stormwater treatment structures
- ☒ Waterbodies identified by name and indication of all use impairments
- ☒ Initial catchment delineations

Optional: Describe any additional progress you made on your map during this reporting period or provide additional status information regarding your map:

The town engaged in a professionally managed extension of its Stormwater and Sewer Asset Management Program (AMP) Grant in conjunction with the town's contractor in the matter, Underwood Engineering. In addition to reorganizing and refining data (including removing/adjusting outfalls and other assets), the town implemented Survey123 for field data collection (asset status and sampling). Likewise, initial catchment delineations based on lidar data occurred and is accessible through the town's GIS system.

Screening of Outfalls/Interconnections

If conducted, please submit any outfall monitoring results from this reporting period. Outfall monitoring results should include the date, outfall/interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results from all analyses. Please also include the updated inventory and ranking of outfalls/interconnections based on monitoring results.

- ☐ No outfalls were inspected
- ☐ The outfall screening data is attached to the email submission
- ☒ The outfall screening data can be found at the following publicly available website:

https://www.wiltonnh.gov/government/stormwater_management/water_sampling_reports

*Below, report on the number of outfalls/interconnections screened **during this reporting period**.*

Number of outfalls screened:

*Below, report on the percent of total outfalls/ interconnections screened **to date**.*

Percent of outfalls screened:

Optional: Provide additional information regarding your outfall/interconnection screening:

The Town, realizing that it's outfall screening efforts needed to take a large advancement in year 5, heavily focused on YSI Sampling at outfalls during its prime summer stormwater management time. The Stormwater

Manager, set up a program where two interns executed mass screening on the town's outfalls. Due to the unprecedented wet conditions during the summer of year 5, approximately 29 outfalls of a known 33 functioning outfalls were partially screened in conditions that could only reasonably be assessed as wet weather due to the volume of water coursing through the town's MS4 area during the period. The remaining outfalls were inaccessible due to heightened water levels or other reasons. While a large portion of the outfalls ended up not being screened before June 30th, by early August, the town achieved wet-weather YSI screening of a majority of its known outfalls according to the town's updated protocols and procedures. The Town is hopeful to execute wet weather e-coli testing at each accessible outfall before Summer 2024.

Catchment Investigations

If conducted, please submit all data collected during this reporting period as part of the dry and wet weather investigations. Also include the presence or absence of System Vulnerability Factors for each catchment.

- ☒ No catchment investigations were conducted
- ☐ The catchment investigation data is attached to the email submission
- ☐ The catchment investigation data can be found at the following publicly available website:

*Below, report on the number of catchment investigations completed **during this reporting period**.*

Number of catchment investigations completed this reporting period:

*Below, report on the percent of catchments investigated **to date**.*

Percent of total catchments investigated:

Optional: Provide any additional information for clarity regarding the catchment investigations below:

The Town previously did not have professionally delineated catchments. This year, as part of the town's AMP grant extension, initial progress was made towards catchment delineation based on lidar data. The Town has rough initial scientifically analyzed catchment delineations, and also began to investigate catchment procedures to daopt, and started to engage the Wilton Sewer Commission on their anticipated involvement. The town screened 29 of 33 outfalls in wet weather that service catchments in that area.

IDDE Progress

If illicit discharges were found, please submit a document describing work conducted over this reporting period, and cumulative to date, including location source; description of the discharge; method of discovery; date of discovery; and date of elimination, mitigation, or enforcement OR planned corrective measures and schedule of removal.

- ☒ No illicit discharges were found
- ☐ The illicit discharge removal report is attached to the email submission
- ☐ The illicit discharge removal report can be found at the following publicly available website:

*Below, report on the number of illicit discharges identified and removed, along with the volume of sewage removed **during this reporting period**.*

Number of illicit discharges identified:

Number of illicit discharges removed: Estimated volume of sewage removed: gallons/day

*Below, report on the total number of illicit discharges identified and removed to date. At a minimum, report on the number of illicit discharges identified and removed **since the effective date of the permit (July 1, 2018)**.*

Total number of illicit discharges identified: Total number of illicit discharges removed:

Optional: Provide any additional information for clarity regarding illicit discharges identified, removed, or planned to be removed below:

The Town's Stormwater Manager and Building Inspector investigated several potential illicit discharges within the town in year 5, or situations that might create the potential for illicit discharges, but none were definitively identified. The lack of sufficiently trained staff and the massive costs associated with third party assistance is definitely a barrier for a town Wilton's size.

Employee Training

Describe the frequency and type of employee training conducted **during this reporting period:**

Staff / Personnel Training Sessions

05/05/2023 - Conducted by NHDES Staff - Requirements of Phosphorous Impairments

6/06/2023 - Conducted by Underwood Engineers – How to Use Survey123

6/20/2023 - Conducted by Underwood Engineers – Catchment Delineation Software

6/27/2023 - Conducted by Underwood Engineers - In-House Training – Survey123 Practical Applications

MCM4: Construction Site Stormwater Runoff Control

*Below, report on the construction site plan reviews, inspections, and enforcement actions completed **during this reporting period**.*

Number of site plan reviews completed: Number of inspections completed: Number of enforcement actions taken:

Optional: Enter any additional information relevant to construction site plan reviews, inspections, and enforcement actions:

The Wilton Planning Board adopted amended stormwater regulations in December 2023 that were in part created by storm water regulation review for year 4. During the year 5 reporting period, 6 site plan reviews occurred that required town stormwater applications, but none were completed. No construction activity warranted inspection during the reporting period. As of 9/26/2023, 1 of the 6 site plan reviews was completed, and a 2nd is anticipated to qualify as completed soon.

MCM5: Post-Construction Stormwater Management in New Development and Redevelopment

Ordinance or Regulatory Mechanism

Date ordinance was completed (due in year 3): 2013 originally; amended January 4, 2023

Website of ordinance or regulatory mechanism:

<https://www.wiltonnh.gov/common/pages/DownloadFileByUrl.aspx?key=8O%2faNdn9JJYjMhUG%2fP6%2bjcHLPXJu7TOQVjaYigHzWLoU3iDwQgvgbkI%2fcYCbMhh%2fHqWbqOg62Ow%2fd%2fNrejThE48wMUqQd29uS9KtOEIKIJOi7l0SAI32TcfZ%2fRJxHWsRjkqX7xL1B6W6kOyi8Lkw0DYm9vsyQWuNnNJEL1xNN0ZCld8Dk8MxnHOElZke2zEqsS2qfCwgfYk8nm7kFGlVt6JssmTzvzLUQewq02%2bkNf7zHMHS>

As-built Drawings

*Below, report on the number of as-built drawings received **during this reporting period**.*

Number of as-built drawings received: 6

Optional: Enter any additional information relevant to the submission of as-built drawings:

The Town of Wilton's Stormwater Regulations require submission of as-built drawings in the form of site plans during the Planning Board various review process tracts. These as-built drawings are also required for stormwater applications. Any amendments that are required as part of the Planning Board's review are required to be incorporated into the as-built drawings before approval or as conditional approval. Failure to build as built would be dealt with through the town's code enforcement procedures.

Street Design and Parking Lots Report

Describe the status of the street design and parking lots assessment including any planned or completed changes to local regulations and guidelines:

Wilton is under a New Permit and this is due in year 6.

Green Infrastructure Report

Describe the status of the green infrastructure report including the findings and progress towards making the practice allowable:

Wilton is under a New Permit and this is due in year 6.

Retrofit Properties Inventory

Describe the status of the inventory of permittee-owned properties that could be modified or retrofitted with BMPs to mitigate impervious areas and report on any properties that have been modified or retrofitted:

Wilton is under a New Permit and this is due in year 6.

General Updates:

Town Hall (42 Main Street) - The Cooley Park Rain Garden retrofit installed in the Summer of 2022 to better treat stormwater runoff from the town hall theatre roof is performing well, although it may require more permanent adjustments to the plastic piping conveying it from the roof to the garden. Prior to the installation of the garden, the existing water diversion system was creating ruts that were potentially diverting roof water inappropriately.

Riverwalk Park - (Forest Road / Main Street) Stormwater retrofit stormwater controls installed in 2020/2021 are functioning exceptionally well. New stone fill replenishment for the walkway areas is needed to remain optimized, and a solution for the road runoff from the NHDOT managed Forest Road needs to be planned and implemented.

Highway Garage (89 Whiting Hill Road) - Salt Shed will require modification if salt storage is to remain on site. Specifically, installation of impermeable base, and drainage controls likely.

Misc.: Current waste soil storage area at Laurel Hill Cemetery will need retrofitting if it is to remain.

MCM6: Good Housekeeping

Catch Basin Cleaning

*Below, report on the number of catch basins inspected and cleaned, along with the total volume of material removed from the catch basins **during this reporting period**.*

Number of catch basins inspected:

Number of catch basins cleaned:

Total volume or mass of material removed from all catch basins:

Below, report on the total number of catch basins in the MS4 system.

Total number of catch basins: 0

If applicable:

Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:

No catch basin was reported to be above 50% or near there.

Street Sweeping

*Report on the number of miles swept **during this reporting period** below.*

Number of miles cleaned: 5.048

*Report either the volume or weight of street sweeping materials collected **during this reporting period** below.*

☒ Volume of material removed: 20 cubic yards

☐ Weight of material removed: [Select Units]

Stormwater Pollution Prevention Plan (SWPPP)

*Below, report on the number of site inspections for facilities that require a SWPPP completed **during this reporting period**.*

Number of site inspections completed: 0

Describe any corrective actions taken at a facility with a SWPPP:

None. Previously, draft SWPPPs were started by former Wilton stormwater management personnel. Likewise, some facilities already had preexisting stormwater maintenance practices that were being executed as a matter of course. However, these draft SWPPPs with one exception, were not completed or otherwise clearly integrated into the town's regular operations thoroughly or consistently. The town has in year 5 formally adopted SWPPPs for major town facilities and is setting up an inspection schedule to occur formally and regularly in year 6 and onwards. The town has conducted numerous SWPPP facility inspections that were useful to inform stormwater controls (e.g. identifying needed repairs or retrofits), but they weren't done very formally.

Additional Information

Monitoring or Study Results

Results from any other stormwater or receiving water quality monitoring or studies conducted during the reporting period not otherwise mentioned above, where the data is being used to inform permit compliance or permit effectiveness must be attached.

- ☐ Not applicable
- ☐ The results from additional reports or studies are attached to the email submission
- ☒ The results from additional reports or studies can be found at the following website(s):

https://www.wiltonnh.gov/government/stormwater_management/water_quality_data_in_wilton

If such monitoring or studies were conducted on your behalf or if monitoring or studies conducted by other entities were reported to you, a brief description of the type of information gathered or received shall be described below:

On June 30th, 2023, Town of Lyndeborough employees reported to the Town of Wilton alarmingly high e-coli tests as part of code enforcement efforts they were pursuing. Said e-coli tests were taken at locations that were outside the MS4 area, but believed to potentially impact Stony Brook, one of Wilton's impaired water bodies. The Wilton Stormwater Manager subsequently notified the Wilton Select Board and personnel at Goss Park of the elevated test results. Goss Park is located on a bend of Stony Brook, just South of Lyndeborough, in the Town of Wilton, and diverts water directly from Stony Brook to provide an open system water recreation beach that has operated for decades. Goss Park personnel and volunteers with the Friends of the Souhegan, subsequently began a prolonged cycle of e-coli testing within Goss Park and outside it at their Stony Brook inlet that resulted in further numerous high e-coli tests. All tests or reports of tests received by the town were in the form of either official chain of custody reports from professional testing facilities provided by third parties or word of mouth test reports sent by volunteers obtained allegedly from professional testing facilities. Eventually, this third party testing at various sites in Wilton and Lyndeborough leveled off to more typical levels in early August.

Additional Information

Optional: Enter any additional information relevant to your stormwater management program implementation during the reporting period. Include any BMP modifications made by the MS4 if not already discussed above. If any of the above year 5 requirements could not be completed due to the impacts of COVID-19, please identify the requirement that could not be completed, any actions taken to attempt to complete the requirement, and reason the requirement could not be completed below:

1. Wilton executed and recorded it's traditional yearly catch basin cleanings completely, but due to new Highway staff and when the cleanings occurred, the proper reporting procedure log forms created by the previous stormwater manager weren't utilized, therefore the town only has macro-level data for the year 5 period. As was typical, no catch basin was noted as anywhere near 50% full.
2. Dry weather sampling procedures have been adopted by the town previously, but updates are not incorporated yet into the latest 2023 IDDE Plan update. Similarly, while the town has draft catchment investigation procedures it's considering, they aren't adopted or integrated yet; the requirements to involve the town's small, volunteer managed sewer system make progress in Wilton especially complex.
3. New Hampshire and Wilton respectively had an unprecedented amount of precipitation in year 5. In addition to massive late winter snow storms, the unexpected summer rains were intensely impactful. Although Wilton wasn't as affected as some communities by the snow storms or rains, there were numerous washouts and damage to roads and drainage infrastructure, and no emergency aid was forthcoming. Not only was this financially burdensome, the raw impacts on existing staff time directly attributable to these events was felt throughout the year, and certainly affected progress on the town's SWMP.
4. Emergency Dam maintenance and monitoring procedures starting in the later winter of year 5 at the New

Reservoir Dam, a destructive fire at the Wilton Highway Garage, tangibly progressing on no less than six other major complex infrastructure projects, and executing numerous code enforcement actions have demonstrated how difficult it is for a very small town government to make consistent SWMP progress in line with expected minimum control measures. This is due to the multiple roles executing staff and personnel are required to fulfill - every new issue that crops up unrelated to MS4 is a drain from the time that might be spent on MS4 progress due to the lack of dedicated staff. Currently, it is deemed financially unfeasible to hire dedicated staff, and contracting out specialty labor is complex and not without its own large costs.

5. Ultimately, the cause of the radically elevated e-coli tests for Stony Brook at Goss Park or its contributors in Lyndeborough is uncertain, and a path to rectification is equally murky: Lyndeborough officials were testing as part of monitoring code enforcement actions related to one or more failed septic systems. Testing in Lyndeborough to detect those failed septic system(s) eventually reportedly leveled off by August. Lyndeborough officials did also make Wilton staff aware of high tests north of the septic system(s) of concern possibly associated with professional or recreational animal ownership runoff. That said, the high tests in Lyndeborough and at Goss Park also corresponded to heavy rainfall, often on the back of already heavy rainfall in the region, and it is speculated that the abnormal run off and drainage associated with those rain events also contributed to some degree.

6. The Town is seriously pursuing the concept of having a new highway garage / public works facility. It is believed implementing a new facility would have massive benefits to existing stormwater compliance issues, but this would be a generational spend, and will take an at present indeterminate amount of time to come to fruition.

7. It's become clear that the ideal time for the town to work on MS4 stormwater given local form of government and public service rhythms, is late spring and through the summer, but there's clearly a trend to not be able to complete permit obligations fully before the June 30th deadline. Adjustments will be tangibly pursued in year 6.

Concluding notes from the Town's current Stormwater Manager:

Wilton continues to attempt to progress on its SWMP according to the NH Small MS4 General Permit Requirements. Overall, even with the phased framework of the EPA's implementation structure, the reality of Wilton's progression according to even minimum permit expectations is extremely difficult, especially in light of starting to embark on efforts that require complex planning, execution, and actual major budget commitments.

It's probably not an exaggeration to say that Wilton (the government and its people), still haven't fully metabolized the breadth and scope of what MS4 will require despite dedicated efforts from the local, state, and national personnel to articulate and estimate impacts for years. While Wilton is probably not alone in experiencing compliance challenges, the sheer size of the unfunded mandates for compliance is incredibly difficult for perhaps one of the smallest municipal stormwater systems in the region, especially in New Hampshire, where funding and impetus for projects is hyper localized.

What's more, the cold reality is the town's previous years' efforts were focused on progressing on the permit's softer requirements (raising awareness, gesturing towards eventual IDDE efforts) and very few personnel involved since the town's NOI was submitted were knowledgeable of MS4, or even trained on how to coordinate execution. Previous and current teams, although dedicated, were/are learning on the fly oftentimes, and have to convince policy makers and residents of movement every step of the way: The town's siloed government structures, minimal public works staff, and skeletal community development organs are massive impediments to these efforts.

Likewise, staff turnover and exigent labor bandwidth consumers (COVID-19, weather emergency impacts, other more immediate, tangible local developments or projects) are going to be an ongoing problem. Ideally, the expectations for Wilton's compliance would adjust somehow, as fully complying with the applicable existing permit timeline will be exceedingly difficult based on anticipated capacity growth.

All this under consideration, the Town of Wilton is an incredibly beautiful, vibrant, and unique community. Town personnel (staff and officials, past and present) and the general public here in Wilton care deeply about the environment, and will do their best to pursue requirements. This will certainly mean real capacity building in coming years, but great progress has been made, and will continue to be made.

Finally, Wilton extends its thanks to State NHDES liasons and its Lower Merrimack Stormwater Coalition member communities for the help and service they provide.

Activities Planned for Next Reporting Period

Please confirm that your SWMP has been, or will be, updated to comply with all applicable permit requirements including but not limited to the year 6 requirements summarized below. (Note: impaired waters and TMDL requirements are not listed below)

Yes, I agree ☒

- Develop a report assessing current street design and parking lot guidelines and other local requirements within the municipality that affect the creation of impervious cover
- Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist
- Identify a minimum of 5 permittee-owned properties that could potentially be modified or retrofitted with BMPs to reduce impervious areas

Annual Requirements

- Annual report submitted and available to the public
- Annual opportunity for public participation in review and implementation of SWMP
- Keep records relating to the permit available for 5 years and make available to the public
- Properly store and dispose of catch basin cleanings and street sweepings so they do not discharge to receiving waters
- Annual training to employees involved in IDDE program
- Update inventory of all known locations where SSOs have discharged to the MS4
- Continue public education and outreach program
- Update outfall and interconnection inventory and priority ranking and include data collected in connection with the dry weather screening and other relevant inspections conducted
- Implement IDDE program
- Review site plans of construction sites as part of the construction stormwater runoff control program
- Conduct site inspection of construction sites as necessary
- Inspect and maintain stormwater treatment structures
- Log catch basins cleaned or inspected
- Sweep all curbed streets at least annually
- Continue investigations of catchments associated with Problem Outfalls
- Implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities
- Review inventory of all permittee owned facilities in the categories of parks and open space, buildings and facilities, and vehicles and equipment; update if necessary

- Review O&M programs for all permittee owned facilities; update if necessary
- Implement all maintenance procedures for permittee owned facilities in accordance with O&M programs
- Implement program for MS4 infrastructure maintenance to reduce the discharge of pollutants
- Enclose all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt
- Review as-built drawings for new and redevelopment to ensure compliance with post construction bylaws, regulations, or regulatory mechanism consistent with permit requirements

Provide any additional details on activities planned for permit year 6 below:

Part V: Certification of Small MS4 Annual Report 2023

40 CFR 144.32(d) Certification

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


Name:

Nicholas P. Germain

Title:

Town Administrator

Signature:



Date:

9/28/27

[Signatory may be a duly authorized representative]