Town of Goffstown

DEPARTMENT OF PUBLIC WORKS

February 19, 2009

Ms. Thelma Murphy
USEPA – (CIP)
One Congress Street – Suite 1100
Boston, MA 02114

RE: Comments to the Draft NH MS4 Permit

Dear Ms. Murphy:

The Town of Goffstown sits just west of the City of Manchester, NH. Goffstown is a scenic town with twin mountains, forested hills, winding rivers, and an attractive New England village center. Recreational opportunities, including hiking, swimming, boating, fishing, snowmobiling, skating, abound. In the past few years, Goffstown's Economic Development Council has begun to focus on Goffstown's natural resources as a means to attract development to our community. Goffstown's very successful Main Street Program regularly utilizes the Piscataquog River to draw people into our historic village for community events. Obviously, the Town of Goffstown share's the goal of EPA to promote the clean and healthy use of our natural resources.

The Town of Goffstown would like to offer the USEPA the following comments to the Draft NH MS4 Permit:

- **2.1.1 Requirements to meet Water Quality Standards**
  a. Leaving 60 days to rectify an exceedance of water quality standards is unreasonable. There will be times when the solution will not be an easy fix or within the direct authority and control of the MS4. Third parties will become involved and these things will take time to work out. There may also be legitimate budget constraints that have to be planned and budgeted. There should be good faith mechanism that allows problems

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to be resolved with diligence and persistence over time so long as a demonstration can be made that there is progress towards solution.

- **2.2.3 Discharge to Chloride Impaired Water in New Hampshire**
  a. Requiring public and private sectors to report the amount of chloride-based deicing chemicals for each storm will be troublesome. Though the Goffstown DPW (GDPW) has a good grasp of our salt use, most users do not. The Town has no authority to require reporting of or enforce usage requirements of contractors working on private sites. The Town does not have the resources to adequately track all of the maintenance of private lots.
- **2.3.2 Public Education and Outreach**
  a. It is going to be difficult to measure the effectiveness of the education and outreach. It is usually difficult to get the public to respond to surveys or other gauging methods.
- **2.3.4 Illicit Discharge Detection and Elimination (IDDE) Program**
  a. The requirement to walk all stream miles seems excessive. In the first permit we developed a good sense of the areas of concern. Leaving the Town the discretion to concentrate on suspected areas of concern seems like a more prudent use of limited resources. There is also the major issue of legal access to private property. Without the proper easements and permissions it would be trespassing for us to walk across private property. Getting access approvals for every stream mile seems like an extremely excessive requirement if no suspected problem exists.
- **2.3.5 Construction Site Stormwater Runoff Control**
  a. Though LID Development is regularly reviewed the Goffstown DPW is not comfortable implementing LID systems in residential developments where the maintenance of the systems is left up to individual homeowners. We feel it is not practical to expect homeowners to understand and maintain these systems. Town maintenance personnel are already stretched too thin and cannot take on the added responsibities of maintaining numerous homeowner LID systems. If the roadway is designed with LID systems on private property the public infrastructure will be jeopardized when the LID systems on private property begin to fail and the additional runoff makes its way into the public ROW that does not have the proper design elements to handle the additional flow.
- **2.3.6 Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management)**
  a. See comment above for Section 2.3.5.
  b. Early assessment of wide-scale pervious pavement use in our northern climate does not look promising or practical.

- **2.3.7 Good House Keeping and Pollution Prevention for Permittee Owned Operations**
  a. Though the Town continues to try to work with the School District, the Town school system is a separate political entity not under the control of the Board of Selectmen.
  b. The requirement to inspect every catch basin annually and clean them at least every other year is excessive. If a town has developed a monitoring and cleaning program that identifies a cleaning schedule that assures the basins are being adequately cleaned, there should be an acceptance mechanism for that system rather than a random time frame.

Part 3.0 Outfall Monitoring Program

The requirements for monitoring 25 percent of our outfalls each year on top of dealing with any problem areas, will be very costly for MS4's, especially in the current economy when tax dollars are being severely stretched and town's need to prioritize their public safety needs. One thing that USEPA should consider would be an amendment to the **"Beaches Environmental Assessment and Coastal Health Act of 2000"** to expand the grant provisions for coastal sampling to all storm water sampling.

Thank you for the opportunity to respond and comment on the December 2008 Draft Small MS4 General Permit. I hope these comments will be found useful in developing a final permit that balances the needs of the environment with our citizenry's ability to pay and implement a viable program. If you have any questions, or if there is anything else I can offer to assist do not hesitate to contact me.

Sincerely,

Carl L. Quiram, PE
Director of Public Works

CC: Honorable Senator Judd Gregg
Honorable Senator Jeanne Shaheen
Goffstown Board of Selectmen
Jeff Andrews, NHDES