

# **Year 7 Annual Report**

**New Hampshire Small MS4 General Permit**

**EXISTING PERMITTEES**

**Reporting Period: July 1, 2024 - June 30, 2025**

**Town of Pelham**

EPA NPDES Permit Number NHR041025

# Certification of Small MS4 Year 7 Annual Report

"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: <i>Joseph Roark</i> |                      |
| Title: <i>Town Administrator</i>  |                      |
| Signature: <i>Joseph Roark</i>    | Date: <i>9/24/25</i> |

## Authorized Representative:

The authorization letter is:

☐ Attached to this document (document name listed below):

N/A

☐ Publicly available at the website:

## Primary MS4 Program Manager Contact Information:

|                                        |                                                           |                        |
|----------------------------------------|-----------------------------------------------------------|------------------------|
| Name: <i>Dena Hoffman</i>              | Title/Position: <i>Health &amp; Environmental Officer</i> |                        |
| Department: <i>Planning Department</i> |                                                           |                        |
| Street Address: <i>6 Village Green</i> |                                                           |                        |
| Town: <i>Pelham</i>                    | State: <i>New Hampshire</i>                               | Zip Code: <i>03076</i> |
| Email: <i>dhoffman@pelhamweb.com</i>   | Phone Number: <i>(603) 508-3028</i>                       |                        |

# 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, 2024, through June 30, 2025**, in accordance with the Permit.

*Please do not attach any documents to this form. Instead, attach all requested documents to an email when submitting the form. Also ensure that any websites included on this form are to publicly accessible sites and that links are correct and valid.*

*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, 2024, and June 30, 2025, unless otherwise requested.*

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

|                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities">https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities</a> |
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Compliance activities have been identified and described in the Town of Pelham's Stormwater Management Program Plan (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. Those documents and other pertinent Year 7 information can be found in submission or at the following websites, and will be referred to throughout this report:

|                                                                                                                                                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SWMP: <a href="https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/pelham_swmp_year_7.pdf">https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/pelham_swmp_year_7.pdf</a> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                                           |
|-------------------------------------------|
| Date SWMP was Last Updated: June 30, 2025 |
|-------------------------------------------|

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|--------------------|
| IDDE Program Plan: |
|--------------------|

|                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/pelham_iddep_2025.pdf">https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/pelham_iddep_2025.pdf</a> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                    |
|--------------------|
| Updated System Map |
|--------------------|

|                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/ms4_2025_map.pdf">https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/ms4_2025_map.pdf</a> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                            |
|----------------------------|
| Updated SSO Inventory: N/A |
|----------------------------|

|                                                                                               |
|-----------------------------------------------------------------------------------------------|
| Updated Inventory and Ranking of Outfalls/Interconnections with System Vulnerability Factors: |
|-----------------------------------------------------------------------------------------------|

|                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/outfall_ranking.pdf">https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/outfall_ranking.pdf</a> |
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|                             |
|-----------------------------|
| Dry Weather Screening Data: |
|-----------------------------|

|                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/dry_weather_screening_summary_report_2022.pdf">https://www.pelhamweb.com/sites/g/files/vyhli4856/f/uploads/dry_weather_screening_summary_report_2022.pdf</a> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Wet Weather Screening Data:<br><a href="https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/water_quality_sampling_data_year_7.pdf">https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/water_quality_sampling_data_year_7.pdf</a> |
| Catchment Investigation Data: No catchment data for Year 7                                                                                                                                                                                         |
| Illicit Discharge Removal Report:<br><a href="https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/pelham_iddep_2025.pdf">https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/pelham_iddep_2025.pdf</a><br>Page 164                 |
| Results from additional stormwater or receiving water quality monitoring reports or studies: N/A                                                                                                                                                   |

|                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PTAP 2025 Nutrient Reduction Report:<br><a href="https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/ptap_summary_table.pdf">https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/ptap_summary_table.pdf</a> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                              |
|------------------------------|
| Salt Reduction Plan: N/A     |
| Annual Salt Usage Report N/A |

|                                                      |
|------------------------------------------------------|
| Updated Nitrogen Source Identification Report: N/A   |
| PTAP 2025 Nutrient Reduction Report: N/A             |
| Town of Pelham Nutrient Tracking Program Report: N/A |

|                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Updated Phosphorus Source Identification Report:<br><a href="https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/psir_year_7.pdf">https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/psir_year_7.pdf</a>   |
| PTAP 2025 Nutrient Reduction Report:<br><a href="https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/ptap_summary_table.pdf">https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/ptap_summary_table.pdf</a> |
| Town of Pelham Nutrient Tracking Program Report: N/A                                                                                                                                                                        |

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|-------------------------------|
| Street Sweeping Schedule: N/A |
|-------------------------------|

|                               |
|-------------------------------|
| Chloride Reduction Plan: N/A  |
| Annual Salt Usage Report: N/A |

|                                                      |
|------------------------------------------------------|
| Lake Phosphorus Control Plan: N/A                    |
| PTAP 2025 Nutrient Reduction Report: N/A             |
| Town of Pelham Nutrient Tracking Program Report: N/A |

## Self-Assessment

Select the impairment(s) and/or TMDL(s) that are applicable to your MS4. Make sure you are referring to the [2020/2022 EPA approved Section 303\(d\) Impaired Waters List](#) which was used for the Year 7 reporting period and can be found on the [New Hampshire Department of Environmental Services \(NHDES\) webpage](#).

All **Appendix F and H requirements** can be found under “Appendix F and H: Water Quality Limited Waters & TMDLs” section of this report.

|                                                            |                                                                  |                                                   |
|------------------------------------------------------------|------------------------------------------------------------------|---------------------------------------------------|
| Impairment(s)                                              |                                                                  |                                                   |
| <input type="checkbox"/> Bacteria/Pathogens                | <input type="checkbox"/> Chloride                                | <input type="checkbox"/> Nitrogen                 |
| <input checked="" type="checkbox"/> Phosphorus             | <input type="checkbox"/> Solids/Oil/Grease (Hydrocarbons)/Metals |                                                   |
| TMDL(s)                                                    |                                                                  |                                                   |
| <input checked="" type="checkbox"/> Bacteria and Pathogens | <input type="checkbox"/> Chloride                                | <input type="checkbox"/> Lake and Pond Phosphorus |

## Receiving Waters/Impaired Waters/TMDL

Have there been any changes to your lists of **receiving waters or impairments** since the NOI was submitted?

☒ Yes

Changes have been made to the lists of receiving waters or impairments since the NOI submission. The following **impairments and/or TMDLs** have been added or delisted:

Water Quality Impaired Waters: Long Pond went from a 5-M status to a 5-P status for dissolved oxygen saturation. Long Pond also went from a 5-P to a 5-M status for Total Phosphorus. Frost Brook – Gumpas Pond was added in the 2020/2022 303(d) List for 5-M in pH. Beaver Brook, Tony’s Brook, and Little Island Pond did not experience a change in impairments.

TMDL: None of the Pelham TMDLs have been added or delisted since the NOI submission.

☐ No

There have been no changes to the lists of **receiving waters or impairments** since the NOI submission.

Have there been any changes to your **list of outfalls** since the NOI was submitted?

☒ Yes

Changes have been made to the **list of outfalls** since the NOI submission.

A total of 0 outfall(s) have added.

A total of 177 outfall(s) have been removed.

☐ No

Pelham has not made changes to the **list of outfalls** since the NOI submission.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

|                                                                                                 |
|-------------------------------------------------------------------------------------------------|
| Pelham started with 311 outfalls and determined that only 134 were within the MS4 area in 2022. |
|-------------------------------------------------------------------------------------------------|

## Minimum Control Measures

### MCM 1: Public Education

Total number of all MS4 related educational efforts completed **during this reporting period: 7**

Were any of the messages below different than what was proposed in your NOI?

☒ No.

☐ Yes. The Town of Pelham made changes.

#### BMP: Grass and Fertilizer

##### Outreach Resources:

Grass and fertilizer related flyers, mailers, postcards, videos and social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

##### Description:

Distribution and promotion of “Green Grass and Clean Water” and/or municipally created flyers and social media posts. “Green Grass and Clean Water” materials were produced by UNH Cooperative Extension, NH Sea Grant, and NHDES outlining simple recommendations to keep

lawns healthy while reducing water quality impacts - including proper fertilizer techniques and disposal of grass clippings.

In May 2025, the Town of Pelham posted an informational graphic to social media discussing best management practices for fertilizer use and how to reduce impacts to the environment. The post discusses what some safer fertilizer options look like, how to not overapply, and the best times and places to use fertilizer if you are choosing to do so. This information was also shared as physical flyers at the Pelham Old Home Day that was on September 14<sup>th</sup> and at the Pelham Protect Our Ponds Conference that was held April 26, 2025.

**Targeted Audience:**

Residents and Businesses

**Responsible Department/Parties:**

Planning Department

**Measurable Goal(s):**

Residents that are lawn care enthusiasts understand the potential water quality impacts from fertilizer and improper disposal of grass clippings and are aware of the proper lawn care management techniques for reducing those impacts. Measurement includes quantity of materials distributed.

Following are the number of flyers that were distributed *during this reporting period*:

Year 7 = 20+ flyers

Following is the number of impressions the social media posts received *during this reporting period*:

- Facebook: Views - 552, reach – 448, interactions – 5, likes – 4, comments – 1, link clicks - 1
- Instagram: views – 124, reach – 105, interactions – 2, likes – 2, accounts engaged - 2
- Twitter/X: impressions – 50, engagements – 4, likes - 2

The Protect Our Ponds conference had 50 participants, and the Old Home Day celebration typically has hundreds of people in attendance, making it difficult to quantify that exact number *during this reporting period*.

**Goal was achieved.**

**Message Date:** September 2024, April 2025, May 2025

## **BMP: Pet Waste Disposal**

**Outreach Resources:**

Pet waste related flyers, mailers, postcards, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

**Description:**

Distribution and promotion of “Every Drop” and municipally created flyers with educational information about proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include the “Every Drop” 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 March 2025, we released a pet waste based educational graphic on social media to inform the public of the harm of not properly cleaning up after pets. It talks about the Every Drop pledge from the State of our Estuaries and gives a link for people to pledge to clean up after their pets. The post talks about changes that pet owners can make to help the environment. This information was also shared as physical flyers at the Pelham Old Home Day that was on September 14<sup>th</sup> and at the Pelham Protect Our Ponds Conference that was held April 26, 2025.

**Targeted Audience:**

Residents - Pet Owners

**Responsible Department/Parties:**

Planning Department

**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.

Following is the number of residents that pledged through the PREP “Every Drop” website **during this reporting period:**

Year 7 = 1

Following are the number of flyers, mailers, postcards, **and/or** brochures that were distributed **during this reporting period:**

Year 7 = 20+ flyers

Following is the number of impressions the social media posts received **during this reporting period:**

- Facebook: Views - 558, reach – 328, interactions – 3, likes – 3, link clicks - 2
- Instagram: views – 169, reach – 150, interactions – 4, likes – 4, accounts engaged - 4
- Twitter/X: impressions – 34

The Protect Our Ponds conference had 50 participants, and the Old Home Day celebration typically has hundreds of people in attendance, making it difficult to quantify that exact number **during this reporting period.**

**Goal was achieved.**

**Message Date:** September 2024, March 2025, April 2025

## **BMP: Yard Waste Disposal**

### **Outreach Resources:**

Yard waste related flyers, brochures, pledges, door hangers, and videos found on the [MCM #1 webpage](#) of the NH MS4 website.

### **Description:**

Distribution and promotion of municipally created flyers, brochures, pledges, door hangers, and videos with messaging about impacts from yard waste to waterbodies, alternatives to dumping yard waste, and laws against dumping yard waste near or in waterbodies.

In October 2024, we shared a post on social media about yard waste and that it is illegal in NH to dispose of it in waterbodies and storm drains. The post gives alternatives for handling yard waste such as composting. We also put an educational flyer in the Evergreen Newspaper. 11,000 copies are printed and distributed throughout Pelham, Windham, Salem, Hampstead, Atkinson, and Plaistow.

### **Targeted Audience:**

Residents and Businesses

### **Responsible Department/Parties:**

Planning Department

### **Measurable Goal(s):**

Residents are aware of the water quality impacts of yard waste dumping near or in water bodies and safe alternatives for yard waste disposal.

Following are the number of flyers, brochures, and door hangers that were distributed **during this reporting period:**

Year 7 = 20+ flyers

Following is the number of impressions the social media posts received **during this reporting period:**

- Facebook: reach – 552, impressions – 569, engagement – 19, likes – 2, other clicks – 8, link clicks - 2
- Instagram: reach – 156, interactions – 2, likes - 2
- Twitter/X: impressions - 48

The Protect Our Ponds conference had 50 participants, and the Old Home Day celebration typically has hundreds of people in attendance, making it difficult to quantify that exact number **during this reporting period.**

**Goal was achieved.**

**Message Date:** September 2024, October 2024, April 2025

## BMP: Septic System Maintenance

### Outreach Resources:

Septic system related brochures, letters, videos, **and/or** social media posts found on the [MCM #1 webpage](#) of the NH MS4 website.

### Description:

Distribution and promotion of Get Pumped NH and municipally created brochures and social media posts educating New Hampshire homeowners with septic systems on how to identify, locate and maintain those systems. Get Pumped NH is a collaborated effort between the New Hampshire Association of Septage Haulers (NHASH) and the NHDES.

In September 2024, we posted one of the pre-made NHDES septic smart social media posts. The post was about not overloading your septic by doing multiple water-generating appliances at one time. Included in the caption is a link to [getpumpednh.com](http://getpumpednh.com) where people can learn more. We also put an educational flyer on Septic Smart tips in the Evergreen Newspaper. 11,000 copies are printed and distributed throughout Pelham, Windham, Salem, Hampstead, Atkinson, and Plaistow.

### Targeted Audience:

Septic System Owners

### Responsible Department/Parties:

Planning Department

### Measurable Goal(s):

Residents are aware of water quality impacts from septic systems, the importance of maintaining septic systems, and how to maintain them.

Following are the number of brochures and letters that were distributed **during this reporting period:**

Year 7 = 20+ flyers

Following is the number of impressions the social media posts received **during this reporting period:**

- Facebook: reach – 719, impressions – 737, engagement – 25, likes – 4, link clicks – 2, photo views – 16, other clicks – 3
- Instagram: views – 225, reach – 199, likes – 4, engagements – 4
- Twitter/X: impressions – 41, engagements – 1, likes - 1

The Protect Our Ponds conference had 50 participants, and the Old Home Day celebration typically has hundreds of people in attendance, making it difficult to quantify that exact number **during this reporting period.**

**Goal was achieved.**

**Message Date:** September 2024 and April 2025

## **BMP: Construction/Developers Outreach**

### **Outreach Resources:**

Construction/developers related letter and fact sheets found on the [MCM #1 webpage](#) of the NH MS4 website.

### **Description:**

- ☒ Review the construction checklist with developers and construction contractors prior to the beginning of construction projects (pre-construction) to identify responsible parties, erosion control practices, other best management practices, and requirements for the EPA Construction General Permit as appropriate.

### **Targeted Audience:**

Construction/Developers

### **Responsible Department/Parties:**

Planning Department

### **Measurable Goal(s):**

Contractors, developers, and municipal or local organizations are made aware of the EPA 2022 Construction General Permit and its associated requirements including that those who wish to be considered a qualified person to conduct inspections must meet EPA training standards. Contractors, developers, and municipal or local organizations are also educated on how to properly select, install, and maintain construction related best management practices.

The Town of Pelham held 3 pre-construction meetings *during this reporting period*.

### **Goal was achieved.**

**Message Date:** 2024-2025

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

In July 2024, we released education about algal blooms and how to prevent them from occurring on social media and in the Pelham Evergreen Newspaper. This outreach discusses picking up pet waste, reducing fertilizer usage, and how algal blooms come from excess phosphorus.

In November 2024, we released an educational flyer about winter maintenance to the public in the Evergreen newspaper. This flyer details alternatives to using excess salt to treat driveways, roads, and walkways. It discusses how chloride in salt can be detrimental to aquatic environments and what people can do to reduce their salt usage. Even though Pelham does not have a chloride impairment, this helps with educating the public on their impacts on water environments.

## MCM 2: Public Participation

- ☒ Provided an opportunity for public participation in review and implementation of SWMP and complied with State Public Notice requirements as described in the Town of Pelham SWMP.
- ☒ Kept records relating to the permit for 5 years and made available to the public.

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

**Description:**

The Stormwater Management Program (SWMP) was publicly shared and made available for comments on the Pelham stormwater website. Residents can submit comments at any time of year at this link: <https://www.pelhamweb.com/pelham-stormwater-management-ms4/webforms/comments-on-stormwater-plan>. Documents and records relating to the permit are retained and available for 5 years to the public at <https://www.pelhamweb.com/pelham-stormwater-management-ms4>.

**Was this opportunity different than what was proposed in your NOI?**

☒ No.

☐ Yes.

**Measurable Goal(s):**

Input was received and records are maintained.

**Goal was achieved.**

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

Public involvement or participation opportunities are ancillary to daily operations.

The Town of Pelham has conducted the following public involvement or participation opportunities:

### **Pelham Old Home Day**

**Date:** 9/14/24

**Attendance:** Hundreds of people

**Flyers Taken by Type:**

- Pesticide setback distances brochure: 8
- Scoop the poop: 1
- Septic smart tips: 13

- Household hazardous waste alternatives: 19
- Yard waste: 9
- In total, 50 flyers were taken

**Event Summary:** At Pelham Old Home Day, we had a booth with 5 educational posters and 5 different educational flyers that visitors could take. The different posters were about pet waste, yard waste, septic systems, how to build your own compost bin, and how to make an environmentally friendly weed killer. The 5 educational flyers were about pet waste, yard waste, septic systems, household hazardous wastes alternatives, and pesticide setback distances. We also had booklets about NH LakeSmart practices and the watershed warrior program. We displayed a watershed model and showed people how watersheds work with spray bottles.

## **Pelham Cleanup Day 2024**

**Date:** 10/4/24 9am-12pm

**Attendance:** 5 volunteers

**Event Summary:** Pelham Cleanup Day this year was held at Veteran's Memorial Park, adjacent to Long Pond. The volunteers helped clean up trash throughout the park and the trails. We collected four five-gallon buckets of trash. On the trails, volunteers cut back branches hanging over the paths and moved fallen sticks into the woods. On one trail, water bars were cleaned out of leaves and excess debris. Some volunteers also removed invasive plant species from the roadway.

## **Protect Our Ponds: Keeping Our Water Clean and Healthy Conference 2025**

**Date:** 4/26/2025 8:30am-12pm

**Attendance:** 50

**Event Summary:** The Town of Pelham hosted the Protect Our Ponds: Keeping Our Water Clean and Healthy conference for the public to discuss topics like lake management, homeowner practices, and aquatic invasive species. We had Ted Diers from NHDES talk about the state of the ponds and lakes in NH, Andrea LaMoreaux from NH Lakes talk about stormwater and lake-friendly homeowner practices, and Tom Flannery from MA Department of Conservation and Recreation discuss aquatic invasive species and how to identify them and stop the spread. The conference also had an interactive portion where residents could meet with local organizations and find out more about the resources we have nearby. Organizations included NHDES, NH Lakes, Nashua Regional Planning Commission, MA DCR, Little Island Pond Association, Gumpas Pond Preservation Association, Long Pond Clean Waters Committee, and Pelham Pathways. We also had an interactive watershed model on display.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

## MCM 3: Illicit Discharge Detection and Elimination (IDDE)

### Sanitary Sewer Overflows (SSOs)

- ☒ This SSO section is NOT applicable because we DO NOT have sanitary sewer.
- ☐ This SSO section is NOT applicable because we DID NOT find any new SSOs.
- ☐ The SSO inventory has been updated, including the status of mitigation and corrective measures implemented or was addressed and can be found in submission **and/or** at the following website.

*Below, report on the number of SSOs identified in the MS4 system and removed:*

Number of SSOs identified **during this reporting period:** 0

Number of SSOs removed **during this reporting period:** 0

### MS4 System Mapping

- ☒ MS4 System Map was updated **during this reporting period:**
  - Percent of Phase 1 elements incorporated into MS4 System Map: 100%
  - Percent of Phase 2 elements incorporated into MS4 System Map: 55%
- ☐ MS4 System Map was updated in previous Year(s) and there were no updates in Year 7.
- ☐ Pelham's MS4 System Map is continually updated to incorporate findings and changes from catchment investigations.

Describe any additional details regarding phase 1 and phase 2 MS4 System Mapping requirements, in the box below:

The Town of Pelham is currently working with the New Hampshire Department of Environmental Services and an environmental consultant on putting together a Stormwater Asset Management Program. Mapping for this will reflect Phase 2 requirements. The project is anticipated to be completed in October 2026.

### Screening of Outfalls/Interconnections

#### Dry Weather Screening

- ☒ No outfalls were inspected for dry weather screening **during this report period.**

- ☐ Outfalls were inspected for dry weather screening **during this report period** and data can be found in submission **and/or** at the following website.

*Below, report on the number of outfalls screened in the MS4 system:*

Number of outfalls/interconnections screened **during this reporting period**: 0

Percent of total known outfalls/interconnections screened **to date (Year 1 – Year 7)**: 100

The inventory and ranking of outfalls/interconnections were not updated during Year 7 because outfalls/interconnections were not inspected.

Describe any additional details regarding dry weather screening requirements, in the box below:

Dry weather screening will be done again in Year 8.

## Wet Weather Screening

- ☒ No outfalls/interconnections were inspected for wet weather screening **during this report period**.
- ☐ Wet weather outfall/interconnection screening data collected **during this reporting period** can be found in submission **and/or** at the following website.

**Number** of outfalls screened **during this reporting period**: 0

**Percent** of total known Problem Outfalls and outfalls/interconnections that identify sewer input screened **to date (Year 1 – Year 7)**: 100%

**Percent** of total known outfalls/interconnections screened **to date (Year 1 – Year 7)**: 13.43% (18 wet weather sampled/134 total)

Describe any additional details regarding wet weather screening requirements, in the box below:

N/A

## Catchment Investigations

- ☒ No catchment investigations were inspected for wet weather screening **during this report period**. Catchment investigations include investigations associated with Problem, High Priority, and Low Priority Outfalls/Interconnections within the MS4 regulated area.
- ☐ Catchment investigations were conducted **during this report period**, and data can be found in submission **and/or** at the following website.

**Number** of catchment investigations **during this reporting period**: 0. Catchment Investigations were conducted as outlined in Part [2.3.4.8](#). of the permit and include investigations associated with

Problem, High Priority, and Low Priority Outfalls and Interconnections within the MS4 regulated area.

**Percent** of total Problem Catchment and outfalls/interconnections that identify sewer input investigated **to date (Year 1 – Year 7)**: 100%

**Percent** of total catchments investigated **to date (Year 1 – Year 7)**: 100%

Describe any additional details regarding catchment investigations requirements, in the box below:

## IDDE Progress

- ☐ No illicit discharges were found **during this reporting period**.
- ☐ Illicit discharges were found but not removed **during this reporting period**.
- ☒ Illicit discharges were removed **during this reporting period** and the illicit discharges removal report can be found on page 224 at this link:  
[https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/pelham\\_iddep\\_2025.pdf](https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/pelham_iddep_2025.pdf).

Number of illicit discharges identified **during this reporting period**: 1

Number of illicit discharges removed **during this reporting period**: 1

Estimated gallons of flow removed **during this reporting period**: 1-3 gallons/day

Total number of illicit discharges identified **since the effective date of the permit (July 1, 2018 – June 30, 2025)**: 10

Total number of illicit discharges removed **since the effective date of the permit (July 1, 2018 – June 30, 2025)**: 10

Describe any additional details regarding illicit discharge requirements, in the box below:

N/A

## Employee Training

- ☒ Provided training to employees involved in IDDE program **during this reporting period**:
- The Town of Pelham held an IDDE training session for municipal staff on March 12, 2025. In addition, the Town of Pelham routinely provides IDDE materials and training, including information on how to identify illicit discharges and SSOs are made available to applicable employees in accordance with IDDE Program Plan. Training logs are included in Appendix F of the IDDE Program Plan.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## MCM 4: Construction Site Stormwater Runoff Control

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

Number of site plan reviews completed **during this reporting period:** 8

Number of inspections completed **during this reporting period:** 36

Number of enforcement actions taken **during this reporting period:** 1

Pelham works closely with contractors to address environmental concerns for the least environmental impact.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

### As-built Drawings

Number of as-built drawings received **during this reporting period:** 3

### Local Regulations Assessment Report

- ☒ No updates were made **during this reporting period** because all required updates have been made to make low impact designs allowable as outlined in the **Assessment Report**.

### Street Design, Parking Lots, and Creation of Impervious Cover

- ☐ No updates were made or planned to be made to **Local Regulations** that affect the creation of impervious cover **during this reporting period**.
- ☐ Updates were recommended **and/or** planned to be made to **Local Regulations and/or Guidelines** that affect the creation of impervious cover **during this reporting period**.

- ☒ No updates were made **during this reporting period** because all required **Local Regulation** updates have been made to make low impact designs allowable as outlined in the Local Regulations Assessment Report.

## Green Infrastructure

- ☐ No updates were made or planned to be made to Local Regulations regarding green infrastructure practices **during this reporting period**.
- ☐ Updates were recommended **and/or** planned to be made to **Local Regulations** regarding green infrastructure practices **during this reporting period**.
- ☒ No updates were made **during this reporting period** because all required **Local Regulation** updates have been made to make green infrastructure practices allowable as outlined in the Assessment Report.

## Retrofit Properties Inventory

- ☒ Pelham has identified the remaining permittee-owned properties that **could be** modified or retrofitted with BMPs to mitigate impervious areas and of which are included in the list below:
- List of MS4 Properties: 68 Old Bridge Street, Main Street (NH GIS ID: 06169-023-008-018), 31-74 Newcomb Field Parkway, 6 & 14 Village Green, 27 Muldoon Parkway, 24 & 36 Village Green, Mammoth Road (NH GIS ID: 06169-039-006-181), 8 Nashua Road, Mammoth Road (NH GIS ID: 06169-028-002-035)
- List of Non-MS4 Properties: N/A
- ☒ Pelham has modified or retrofitted the following MS4 properties with BMPs to mitigate impervious areas that were inventoried as part of 2.3.6.e of the permit. Following is a list of the properties that were modified or retrofitted as well as the type of BMP(s) that were implemented:
- List of MS4 Properties: A bioretention structure was installed at Veterans Memorial Park in November 2024. The map and lot are 39-1-169.
- List of Non-MS4 Properties: N/A.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## MCM 6: Good Housekeeping

### Catch Basin Cleaning

- ☒ Stored and disposed of catch basin cleanings so they did not discharge to receiving waters.
- ☒ Report on the actions taken if a catch basin sump is more than 50% full during two consecutive routine inspections/cleaning events:  
No actions were taken because no catch basin sumps were more than 50% full during two consecutive routine inspections/cleaning events.

Number of catch basins inspected **during this reporting period:** 1273

Number of catch basins cleaned **during this reporting period:** 1199

Total volume **or** mass of material removed from **all** catch basins **during this reporting period:** 65 yards

Total number of catch basins within the MS4 system: 1,271

### Street Sweeping

- ☒ Stored and disposed of street sweepings so they did not discharge to receiving waters.
- ☒ All curbed roadways were swept at least once within the reporting period.

Number of (lane) miles swept **during this reporting period:** 109.69 miles

Volume of swept material **during this reporting period:** 131.16 yards

### Stormwater Pollution Prevention Plan (SWPPP)

Pelham has implemented SWPPPs for all permittee owned or operated maintenance garages, public works yards, transfer stations, and other waste handling facilities that are not currently covered under another NPDES Permit.

Number of site inspections completed **during this reporting period:** 12

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

At Gibson Cemetery, one catch basin had an abundance of leaves so it was cleaned out to allow for stormwater flow.

### Operations and Maintenance (O & M) Programs

- ☒ O&M programs for all permittee owned facilities have been completed and/or updated as noted below:

- ☒ Implemented all maintenance procedures for permittee owned facilities in accordance with O&M programs.
- ☒ Updated inventory of all permittee owned facilities as necessary.  
All permittee owned facilities, including an inventory, are included in our SWMP. There were no changes to report during Year 7.
- ☒ Implemented program for MS4 infrastructure maintenance to reduce the discharge of pollutants as outlined in the SWMP.
- ☒ Inspected all permittee owned treatment structures (excluding catch basins) as outlined in the SWMP.
- ☒ Enclosed all road salt storage piles or facilities and implemented winter road maintenance procedures to minimize the use of road salt as outlined in the SWMP.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Appendix F and H: Water Quality Limited Waters & TMDLs

### Bacteria/Pathogens Impairment (Appendix H) AND TMDL (Appendix F)

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

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Chloride Impairment (Appendix H)

☒ Permittee **does not** have a chloride impairment.

☐ Permittee **has** a chloride impairment.

☐ Fully implemented Salt Reduction Plan **during this reporting period** which can be found in submission **and/or** at the following website.

Pelham is utilizing **some/all** of the Voluntary Municipal Green SnowPro Certification Program resources and trainings as outlined in Pelham's Salt Reduction Plan to reduce their winter salt application and to prevent increased concentrations of chlorides in their community's surface and ground waters.

Pelham is certified under the Voluntary Municipal Green SnowPro Certification Program with the goal to reduce their winter salt application and to prevent increased concentrations of chlorides in their community's surface and ground waters.

☐ Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the NHDES Annual Salt Usage reporting form and submitting it to NHDES and can be found in submission **and/or** at the following website. The UNH Technology Transfer Center online tool is non-functional and has been for several years.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Nitrogen Impairment (Appendix H)

☒ Permittee **does not** have a nitrogen impairment.

☐ Permittee **has** a nitrogen impairment.

☐ Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers **during this reporting period**.

☐ Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate **during this reporting period**.

☐ Distributed an annual message encouraging the proper disposal of leaf litter **during this reporting period**.

- ☐ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) **during this reporting period.**
- ☐ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of one time per year (spring) and implemented a fall leaf litter collection program in lieu of post-drop street sweeping **during this reporting period.**

## Nitrogen Source Identification Report- Update

- ☐ The Nitrogen Source Identification Report was reviewed and there were no updates required **during this reporting period** because there were no revisions. The Nitrogen Source Identification Report can be found in submission **and/or** at the following website.
- ☐ The Nitrogen Source Identification Report was **updated during this reporting period** and can be found in submission **and/or** at the following website. An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part I.1.c.ii* of the Nitrogen Source Identification Report.

## Structural BMPs

- ☐ Pelham has **not** installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period.** Pelham plans to install a structural BMP(s) on date structural BMP will be installed.
- ☐ Pelham has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries, **during this reporting period.** The structural BMP(s) was installed on Date structural BMP(s) was installed. The type of structural BMP(s) that was installed was type of structural BMP(s) that was installed. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.iii* of the Nitrogen Source Identification Report.
- ☐ Pelham has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **during the Year 6 reporting period.** The structural BMP(s) was installed on date structural BMP(s) was installed. The type of structural BMP(s) that was installed was type of structural BMP that was installed. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.iii* of the Nitrogen Source Identification Report.
- ☐ Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by Pelham or its agents was tracked and the nitrogen removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area

treated by the BMP(s), the design storage volume of the BMP(s), and the estimated nitrogen removed in mass per year by the BMP(s) were documented in **PTAP 2025 Nutrient Reduction Report** in submission **and/or** at website link. The total estimated nitrogen removed from the installed BMP(s) is ##lbs/year.

Pelham is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with stormwater structural and non-structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows Pelham the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight-of-evidence based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available.

- ☐ Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by Pelham or its agents was tracked and the nitrogen removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated nitrogen removed in mass per year by the BMP(s) were documented in **Pelham Tracking Program** in submission **and/or** at ##website link. The total estimated nitrogen removed from the installed BMP(s) is ##lbs/year.
- ☐ No BMPs were installed **during this reporting period**. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part I.1.c.i* of the Nitrogen Source Identification Report. The total estimated nitrogen removed from the installed BMP(s) is 0 lbs/year.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Phosphorus Impairment (Appendix H)

- ☐ Permittee **does not** have a phosphorus impairment.
- ☒ Permittee **has** a phosphorus impairment.
  - ☒ Distributed an annual message that encourages the proper use and disposal of grass clippings and encourages the proper use of slow-release fertilizers **during this reporting period**.

- ☒ Distributed an annual message encouraging the proper management of pet waste, including noting any existing ordinances where appropriate **during this reporting period.**
- ☒ Distributed an annual message encouraging the proper disposal of leaf litter **during this reporting period.**
- ☒ Increased street sweeping frequency of all municipal owned streets and parking lots subject to Permit part 2.3.7.d.iii to a minimum of two times per year (spring and fall) **during this reporting period.**

## Phosphorus Source Identification Report- Update

### Structural BMPs

- ☐ The Phosphorus Source Identification Report was reviewed and there were no updates required **during this reporting period** because there were no revisions. The Phosphorus Source Identification Report can be found at the following website link.
- ☒ The Phosphorus Source Identification Report was **updated during this reporting period** and can be found in submission **and/or** at the following website:  
[https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/psir\\_year\\_7.pdf](https://www.pelhamweb.com/sites/g/files/vyhlf4856/f/uploads/psir_year_7.pdf). An updated list of the planned structural BMPs and a plan and schedule for implementation can be found in *Section 2: Potential Structural BMPs Report (Year 5) part II.1.c.ii* of the Phosphorus Source Identification Report.
- ☐ Pelham has **not** installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **by the end of this reporting period.** Pelham plans to install a structural BMP(S) on date structural BMP will be installed.
- ☒ Pelham has installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **during this reporting period.** The structural BMP(s) was installed on November 1, 2024. The type of structural BMP(s) that was installed was a bioretention system. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.iii* of the Phosphorus Source Identification Report.
- ☐ Pelham installed a minimum of one structural BMP(s) as a demonstration project within the drainage area of the water quality limited water or its tributaries **during the Year 6 reporting period.** The structural BMP(s) was installed on date structural BMP(s) was installed. The type of structural BMP(s) that was installed was type of Structural BMP that was installed. Information regarding the installed BMP(s) can be found in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.iii* of the Phosphorus Source Identification Report.

- ☒ Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by Pelham or its agents was tracked and the phosphorus removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated phosphorus removed in mass per year by the BMP(s) were documented in **PTAP 2025 Nutrient Reduction Report** at [https://www.pelhamweb.com/sites/g/files/vyhlif4856/f/uploads/ptap\\_summary\\_table.pdf](https://www.pelhamweb.com/sites/g/files/vyhlif4856/f/uploads/ptap_summary_table.pdf). The total estimated phosphorus removed from the installed BMP(s) is 2.63 lbs/year.

Pelham is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with stormwater structural and non-structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows Pelham the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight-of-evidence based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available.

- ☐ Structural BMP(s) listed in Attachment 3 to Appendix F already existing or installed in the regulated area by Pelham or its agents was tracked and the phosphorus removal by the BMP(s) was estimated consistent with Attachment 3 to Appendix F. The BMP(s) type, total area treated by the BMP(s), the design storage volume of the BMP(s), and the estimated phosphorus removed in mass per year by the BMP(s) were documented in **Pelham Tracking Program** in submission **and/or** at website link. The total estimated phosphorus removed from the installed BMP(s) is 2.63 lbs/year.
- ☐ No BMPs were installed **during this reporting period**. The implementation schedule is outlined in *Section 2: Potential Structural BMPs Report (Year 5) in Part II.1.c.i* of the Phosphorus Source Identification Report. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Solids, Oil and Grease (Hydrocarbons), or Metals Impairment(s) (Appendix H)

- ☒ Permittee **does not** have a solids, oil and grease, or metals impairment(s).
- ☐ Permittee **has** a solids, oil and grease, or metals impairment(s).
- ☐ Increased street sweeping frequency of all municipal owned streets and parking lots to a schedule that targets areas with potential for high pollutant loads **during this reporting period**. Pelham street sweeping schedule can be found in submission **and/or** at website link.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Chloride TMDL (Appendix F)

- ☒ Permittee **does not** have a chloride TMDL.
- ☐ Permittee **has** a chloride TMDL.
- ☐ Fully implemented Chloride Reduction Plan which can be found in submission **and/or** at the following website.  
Pelham is utilizing **some/all** of the Voluntary Municipal Green SnowPro Certification Program resources and trainings as outlined in Pelham's Salt Reduction Plan to reduce their winter salt application and to prevent increased concentrations of chlorides in their community's surface and ground waters.
  - ☐ Reported amount of salt applied to all municipally-owned and maintained surfaces by completing the NHDES Annual Salt Usage reporting form, submitting it to NHDES, and can be found in submission **and/or** at the following website. The UNH Technology Transfer Center online tool is non-functional and has been for several years.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Lake and Pond Phosphorus TMDL (Appendix F)

☒ Permittee **does not** have a lake and pond phosphorus TMDL.

☐ Permittee **has** a lake and pond phosphorus TMDL.

### Lake Phosphorus Control Plan Reporting Requirements

☐ The LPCP was submitted in a previous annual report.

☐ The LPCP can be found in submission **and/or** at the following website

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

Pelham has **not fully completed the Year 5 requirements** of the written Lake Phosphorus Control Plan **during this reporting period**. The partially completed plan can be found in submission **and/or** at the following website. The plan is available to the public at website **and/or** facility and physical location. Pelham has completed the following sections of the written Lake Phosphorus Control Plan **during this reporting period**:

☐ Description of Planned Non-structural Controls

☐ Description of Planned Structural Controls

☐ Description of Operation and Maintenance (O&M) Program

☐ Implementation Schedule

☐ Cost and Funding Source Assessment

Pelham plans to complete the outstanding items noted above by date.

Baseline phosphorus export rate required from LPCP Area (lbs/year)[A]: Number

Total phosphorus reduction from all implemented nonstructural controls **during this reporting period** (lbs/year) [B]: Number

Total phosphorus reduction from all structural controls installed **during this reporting period and all previous years** (lbs/year) [C]: Number

Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]: 0

Pelham is utilizing a scaled back approach to Pbase recalculations with assistance from the UNH Stormwater Center. Due to limited funding and available mapping resources, Pelham plans to update the Pbase calculations every 5 years or whenever meaningful and substantial updates are made to the critical impervious surface and land use/cover GIS layers that are used in Pbase characterization. Due to this new approach, **phosphorus**

**load increases due to development incurred since baseline loading** were not calculated **during this reporting period**. The New Hampshire Stormwater Coalition and the UNH Stormwater Center are in the process of calculating the **phosphorus load increases due to development incurred since baseline loading** and will be available in the future.

Phosphorus load increase due to development incurred since baseline loading was calculated in lbs/year [D]: Number

Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]: Number

## Non-Structural Controls

- ☐ Pelham has **not** implemented all selected Lake Phosphorus Control Plan **non-structural control measure(s) during this reporting period** and has **not** documented the measure(s) and their phosphorus reductions. The non-structural control measure(s) that have been implemented are recorded within the Pelham's written Lake Phosphorus Control Plan which can be found in submission **and/or** at the following website.
- ☐ Pelham has implemented all selected Lake Phosphorus Control Plan **non-structural control measure(s) during this reporting period** and documented the measure(s) and their phosphorus reductions. The **non-structural control measure(s)** are noted within the Pelham written Lake Phosphorus Control Plan which can be found in submission **and/or** at the following website.

Pelham is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with non-structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows Pelham the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight-of-evidence based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available.

## Structural Controls

- ☐ Pelham has **not** installed any **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. Therefore Pelham has not documented the location, phosphorus reduction in mass/year, and date of last completed maintenance and inspection for each installed control within the written Lake Phosphorus Control Plan.

- ☐ Pelham has installed **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. Pelham has documented the location, phosphorus reduction in weight/year, and date of last completed maintenance and inspection for each installed structural control measure(s). The documented information for each of the installed structural control measure(s) are noted within the written Lake Phosphorus Control Plan which can be found in submission **and/or** at the following website.

Pelham is utilizing the Pollutant Tracking and Account Project, better known as PTAP, to track nutrient reductions associated with structural best management practices. PTAP was developed by the University of New Hampshire Stormwater Center and New Hampshire Department of Environmental Services utilizing the EPA Region 1 approved performance curves, to provide New Hampshire communities with a way to track their nutrient reductions. PTAP allows Pelham the benefit of utilizing a uniform, defensible and consistent method for tracking reductions so that a common, weight of evidence-based approach can be shared with other entities including EPA, NHDES, and other MS4 communities and interest groups. The consistent and systematic tracking and accounting framework also allows for routine updates when improved science becomes available.

Describe progress made on any **incomplete requirements** listed above **or** optionally provide any additional relevant details, in the box below:

N/A

## Additional Required Information

### Monitoring or Study Results

Results from all stormwater or receiving water quality monitoring or studies conducted **during the reporting period** and **not otherwise mentioned above**, where the data is being used to inform permit compliance or permit effectiveness is:

- ☒ Not applicable.
- ☐ The results from additional reports or studies are in submission **and/or** at the following website.

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:

N/A

### **Description of Any Changes in Identified BMPs or Measurable Goals**

Pelham has implemented activities in accordance with the permit and outlined in the SWMP. All BMPs and measurable goals outlined in the SWMP are appropriate.

### **Activities Planned for Next Reporting Period**

Pelham will continue to implement activities in accordance with the permit and SWMP.