

# Notice of Intent (NOI) for coverage under Small MS4 General Permit

Page 1 of 18

## Part I: General Conditions

### General Information

Name of Municipality or Organization: Veterans Affairs Medical Center - Manchester State: NH

EPA NPDES Permit Number (if applicable): N/A

### Primary MS4 Program Manager Contact Information

Name: Amanda Furtado Title: GEMS Program Manager

Street Address Line 1: 718 Smyth Road

Street Address Line 2:

City: Manchester State: NH Zip Code: 03104

Email: Amanda.Furtado@va.gov Phone Number: (603) 624-4366

Fax Number:

### Other Information

Stormwater Management Program (SWMP) Location (web address or physical location, if already completed): GEMS Office - Building 6. Electronic copy available on internal intranet page (not accessible outside organization).

### Eligibility Determination

Endangered Species Act (ESA) Determination Complete? Yes

Eligibility Criteria (check all that apply): ☐ A ☐ B ☒ C

National Historic Preservation Act (NHPA) Determination Complete? Yes

Eligibility Criteria (check all that apply): ☒ A ☐ B ☐ C ☐ D

☐ Check the box if your municipality or organization was covered under the 2003 MS4 General Permit

## Part II: Summary of Receiving Waters

New Hampshire list of impaired waters: <http://des.nh.gov/organization/divisions/water/wmb/swqa/>

[illegible]

Click to lengthen table

## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary

Identify the Best Management Practices (BMPs) that will be employed to address each of the six Minimum Control Measures (MCMs).

For each MCM, list each existing or proposed BMP by category and provide a brief description, responsible parties/departments, measurable goals, and the year the BMP will be employed (public education and outreach BMPs also requires a target audience). **Use the drop-down menus in each table or enter your own text to override the drop down menu.**

#### MCM 1: Public Education and Outreach

BMP Media/Category (enter your own text to override the drop down menu)	BMP Description	Targeted Audience	Responsible Department/Parties (enter your own text to override the drop down menu)	Measurable Goal	Beginning Year of BMP Implementation
Brochures/Pamphlets/Infrastructure Marking	Develop and implement targeted public education messages. Distribute messages to target audiences.	Patients	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2019
Brochures/Pamphlets/Infrastructure Marking	Develop and implement targeted public education messages. Distribute messages to target audiences.	Visitors	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2019
Newsletters/Emails/Trainings/Intranet	Develop and implement targeted public education messages. Distribute messages to target audiences.	Employees	GEMS Program Manager	Development and implementation of a targeted public education program, distribution of messages to audience within Permit timeframes.	2019

[illegible]



## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

## MCM 2: Public Involvement and Participation

[illegible]

[illegible]

**Notice of Intent (NOI) for coverage under Small MS4 General Permit**Part III: Stormwater Management Program Summary (continued)

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

<b>BMP Categorization</b> (enter your own text to override the drop down menu)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)
SSO inventory	Develop SSO inventory in accordance of permit conditions	Facilities Management Services; GEMS Program Manager	Complete within 4 years of effective date of permit
Storm sewer system map	Create map and update during IDDE program completion	GEMS Program Manager, Engineering Department	Update map within 4 years of effective date of permit and complete full system map 10 years after effective date of permit
Written IDDE program development	Create written IDDE program	GEMS Program Manager; Engineering Department; Facilities Management	Complete within 4 years of the effective date of permit and update as required
Implement IDDE program	Implement catchment investigations according to program and permit conditions	GEMS Program Manager	Complete 10 years after effective date of permit
Employee training	Train employees on IDDE implementation	GEMS Program Manager	Train annually
Conduct dry weather screening	Conduct in accordance with outfall screening procedure and permit conditions	GEMS Program Manager	Complete 6 years after effective date of permit
Conduct wet weather screening	Conduct in accordance with outfall screening procedure	GEMS Program Manager	Complete 10 years after effective date of permit
Ongoing screening	Conduct dry weather and wet weather screening (as necessary)	GEMS Program Manager	Complete ongoing outfall screening on completion of IDDE program

[illegible]



### Part III: Stormwater Management Program Summary (continued)

[illegible]


## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

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

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)
As-built plans for on-site stormwater control	The procedures to require submission of as-built drawings and ensure long term operation and maintenance will be a part of the SWMP	Engineering Department	Require submission of as-built plans for completed projects
Target properties to reduce impervious areas	Complete an inventory and priority ranking of permittee-owned property and existing infrastructure that could be retrofitted with BMPs designed to reduce the frequency, volume and pollutant loads of stormwater discharges to its MS4 through the mitigation of impervious area	Engineering Department	Complete 6 years after effective date of permit and report annually on retrofitted properties
Allow green infrastructure	Develop a report assessing existing local regulations to determine the feasibility of making green infrastructure practices allowable when appropriate site conditions exist	Engineering Department; GEMS Program Manager	Complete 6 years after effective date of permit and implement recommendations of report
Street design and parking lot guidelines	Develop a report assessing requirements that affect the creation of impervious cover. The assessment will help determine if changes to design standards for streets and parking lots can be modified to support low impact design options.	Engineering Department; GEMS Program Manager	Complete 6 years after effective date of permit and implement recommendations of report

[illegible]



## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

#### MCM 6: Municipal Good Housekeeping and Pollution Prevention

<b>BMP Categorization</b> (enter your own text to override the drop down menu or entered text)	<b>BMP Description</b>	<b>Responsible Department/Parties</b> (enter your own text to override the drop down menu)	<b>Measurable Goal</b> (all text can be overwritten)	<b>Beginning Year of BMP Implementation</b>
O&M procedures	Create written O&M procedures including all requirements contained in 2.3.7.1 for parks and open spaces, buildings and facilities, and vehicles and equipment	GEMS Program Manager; Maintenance & Operations Department	Complete and implement 4 years after effective date of permit	2022
Inventory all permittee-owned parks and open spaces, buildings and facilities, and vehicles and equipment	Create inventory	Engineering Department	Complete 4 years after effective date of permit and implement annually	2022
Infrastructure O&M	Establish and implement program for repair and rehabilitation of MS4 infrastructure	Maintenance & Operations Department	Complete 4 years after effective date of permit	2022
Stormwater Pollution Prevention Plan (SWPPP)	Create SWPPPs for maintenance garages, transfer stations, and other waste-handling facilities	GEMS Program Manager	Complete 4 years after effective date of permit	2022
Catch basin cleaning	Establish schedule for catch basin cleaning such that each catch basin is no more than 50% full and clean catch basins on that schedule	Roads & Grounds Department	Clean catch basins on established schedule and report number of catch basins cleaned and volume of material moved annually	2018
Street sweeping program	Sweep all streets and permittee-owned parking lots in accordance with permit conditions	Roads & Grounds Department	Sweep all streets and permittee-owned parking lots once per year in the spring	2018
Road salt use optimization program	Establish and implement a program to minimize the use of road salt	Roads & Grounds Department	Implement salt use optimization during deicing season	2018

[illegible]

## Notice of Intent (NOI) for coverage under Small MS4 General Permit

### Part III: Stormwater Management Program Summary (continued)

### Actions for Meeting Total Maximum Daily Load (TMDL) Requirements

Use the drop-down menus to select the applicable TMDL, action description to meet the TMDL requirements, and the responsible department/parties. If no options are applicable, or more than one, **enter your own text to override drop-down menus**. If submitting a NHDES approved alternative reduction plan, attach and submit it with the NOI.

[illegible]



### Part III: Stormwater Management Program Summary (continued)

Use the drop-down menus to select the pollutant causing the water quality limitation and enter the waterbody ID(s) experiencing excursions above water quality standards for that pollutant. In addition, if you are subject to additional requirements due to a downstream nutrient impairment (see Part 2.2.2 of the permit) select the pollutant of concern and indicate applicable waterbody IDs or write "all waterbodies" if applicable. Choose the action description from the dropdown menu and indicate the responsible party. If no options are applicable, or more than one, **enter your own text to override drop-down menus.**

[illegible]



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### Part IV: Notes and additional information

Use the space below to indicate the part(s) of 2.2.2 that you have identified as not applicable to your MS4 and provide all supporting documentation below or attach additional documents if necessary.

Provide any additional information about your MS4 program below.

Supporting documentation used to make the Endangered Species and Historic Properties determinations is attached to this NOI submittal.

The "2012 List of Threatened or Impaired Waters that Require a TMDL", "2014 List of Threatened or Impaired Waters that Require a TMDL", and "2016 List of Threatened or Impaired Waters that Require a TMDL" were used to make the determination of applicable parts of 2.2.2 to the VAMC Manchester's MS4 stormwater program. The VAMC Manchester is a new permittee to the MS4 General Permit Program. As such, permit required elements that involve the determination of ultimate discharge points of outfalls and interconnections to specific waterbodies were developed for this NOI using the best available knowledge of the VAMC Manchester's MS4 and the City of Manchester MS4. The VAMC Manchester is actively working toward obtaining a complete and accurate MS4 map of their facility. If information becomes available while this map is being prepared that identifies waterbodies ultimately receiving discharge from the VAMC Manchester that have TMDLs or are impaired for parameters that are not listed in this NOI, the VAMC Manchester will amend the NOI, Stormwater Management Plan, and any related actions to implement the appropriate permit requirements.

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### Part V: Certification

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than 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. (40 CFR 122.22)*

Name:

Kevin Forrest

Title:

Associate Director

Signature:

Forrest, Kevin

Digitally signed by Forrest, Kevin  
Date: 2018.09.25 11:14:23 -04'00'

Date:

09/25/18

[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]

Note: When prompted during signing, save the document under a new file name

# **MS4 General Permit NOI Supporting Documentation**

**(Endangered Species Determination Letter and Historic  
Properties Determination Letter)**





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Via Electronic Mail

September 25, 2018



Mr. Newton Tedder  
US Environmental Protection Agency  
Stormwater and Construction Permits Section (OEP06-1)  
Five Post Office Square, Suite 100  
Boston, MA 02109

Re: NH MS4 General Permit Endangered Species Determination – VA Medical Center Manchester,  
718 Smyth Road, Manchester, New Hampshire

Dear Mr. Tedder:

The Veterans Affairs Medical Center Manchester, New Hampshire Campus (VAMC Manchester, site) is a federal, non-traditional MS4 designated by the U.S. Environmental Protection Agency (EPA) for conducting formal or informal consultation with the U.S. Fish and Wildlife Service as a condition of coverage under the 2017 New Hampshire Small MS4 General Permit (Permit).

Woodard & Curran, on behalf of the VAMC Manchester, has evaluated the U.S. Fish & Wildlife Service iPAC Biological and Conservation Data System files in accordance with the methodology presented in Appendix C of the Permit to determine the presence of endangered or threatened species within the program implementation area.

Our review evaluated the area of impact related to required program activities, analysis of these program activity areas within the iPAC database, examining maps, and the personal knowledge of staff and/or cooperating experts with knowledge of site operations.

According to the information currently in the iPAC database, one listed endangered species is located within the vicinity of the VAMC Manchester: the Small Whorled Pogonia. No threatened or candidate species and no critical habitat were identified within the project area. The formal U.S. Fish and Wildlife Service consultation response letter is provided as an attachment to this letter. The proposed stormwater program activities being conducted at the VAMC Manchester include non-structural management of stormwater runoff as required by the Permit. These activities will include education, investigation, and pollutant source control on existing facilities and roadways and will not disturb terrestrial vegetation. As such, activities associated with implementation of the Permit requirements will have "no effect" to the habitats potentially receiving stormwater discharges from the site.

The VAMC Manchester will continue to evaluate potential effects to threatened, endangered, or candidate species and critical habitat related to installation of structural stormwater treatment practices or other land disturbing activities enacted as a result of maintaining compliance with the Permit, and initiate either informal or formal consultation with the U.S. Fish and Wildlife Services to determine potential impacts.

Based on this review and an evaluation of determination requirements outlined in Appendix C of the Permit, we have determined that the VAMC Manchester meets Criterion C.

Please do not hesitate to contact either of the undersigned if you have any questions about the VAMC Manchester's stormwater management program.



Sincerely,

*Amanda Furtado*

Amanda Furtado  
GEMS Program Manager  
VAMC Manchester  
[Amanda.Furtado@va.gov](mailto:Amanda.Furtado@va.gov)  
1-603-624-4366 x6241

*Janelle Bonn*

Janelle Bonn  
Project Scientist  
Woodard & Curran  
[jbonn@woodardcurran.com](mailto:jbonn@woodardcurran.com)  
1-401-427-1314

Enclosures

cc: William Kulas, VA

PN: 229618



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
New England Ecological Services Field Office  
70 Commercial Street, Suite 300  
Concord, NH 03301-5094  
Phone: (603) 223-2541 Fax: (603) 223-0104  
<http://www.fws.gov/newengland>



In Reply Refer To:

September 18, 2018

Consultation Code: 05E1NE00-2018-SLI-3124

Event Code: 05E1NE00-2018-E-07344

Project Name: VA Manchester, NH Medical Campus MS4 General Permit

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.



A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan ([http://www.fws.gov/windenergy/eagle\\_guidance.html](http://www.fws.gov/windenergy/eagle_guidance.html)). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List



## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**New England Ecological Services Field Office**

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541

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## Project Summary

Consultation Code: 05E1NE00-2018-SLI-3124

Event Code: 05E1NE00-2018-E-07344

Project Name: VA Manchester, NH Medical Campus MS4 General Permit

Project Type: \*\* OTHER \*\*

Project Description: This determination is being conducted in support of Notice of Intent requirements under the recently reissued MS4 General Permit. MS4 operations are ongoing throughout the site, which operates as a Veterans Affairs medical campus.

### Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/43.012139519750676N71.4409284871218W>



Counties: Hillsborough, NH

## Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Flowering Plants

NAME	STATUS
Small Whorled Pogonia <i>Isotria medeoloides</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/1890">https://ecos.fws.gov/ecp/species/1890</a>	Threatened

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

---



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Via Electronic Mail

September 25, 2018



Mr. Newton Tedder  
US Environmental Protection Agency  
Stormwater and Construction Permits Section (OEP06-1)  
Five Post Office Square, Suite 100  
Boston, MA 02109

Re: NH MS4 General Permit Historic Properties Evaluation – VA Medical Center, Manchester,  
718 Smyth Road, Manchester, New Hampshire

Dear Mr. Tedder:

Woodard & Curran, on behalf of the Veterans Affairs Medical Center Manchester, New Hampshire Campus (VAMC Manchester, site) has determined that the discharges regulated under the 2017 New Hampshire Small MS4 General Permit (Permit) do not have the potential to cause effects to any properties listed on the National Register of Historic Places. Using the screening process presented in Appendix D of the Permit, the VAMC Manchester is eligible for Permit coverage under Criterion A.

During an evaluation of the site's MS4 operations it was determined that Smyth Tower is located on the site and is registered as a historic place. However; Smyth Tower is not located near or within proximity to known stormwater discharges, allowable non-stormwater discharges, and/or stormwater discharge related activities originating from the VAMC Manchester that would affect this historic structure. Additionally, due to Smyth Tower's location on the highest elevation point of the site in a pervious area, stormwater generated from the site is not expected to affect the structure. Stormwater and allowable non-stormwater discharges will be periodically evaluated, as well as the potential for future construction activities occurring near this historic structure, throughout the Permit term to determine whether additional actions are required to mitigate the effects of stormwater discharges, should they occur. It is important to note that no other historic properties are located within proximity to the site.

Please do not hesitate to contact either of the undersigned if you have any questions about the VAMC Manchester's stormwater management program.

Sincerely,

Amanda Furtado  
GEMS Program Manager  
VAMC Manchester  
[Amanda.Furtado@va.gov](mailto:Amanda.Furtado@va.gov)  
1-603-624-4366 x6241

Janelle Bonn  
Project Scientist  
Woodard & Curran  
[jbonn@woodardcurran.com](mailto:jbonn@woodardcurran.com)  
1-401-427-1314

cc: William Kulas, VA

PN: 229618





# Notice of Intent (NOI) for coverage under Small MS4 General Permit

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## Part V: Certification

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than 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. (40 CFR 122.22)*

Name:

Kevin Forrest

Title:

Associate Director

Signature:

Forrest, Kevin

Digitally signed by Forrest, Kevin  
Date: 2018.09.25 11:14:23 -04'00'

Date:

09/25/18

*[To be signed according to Appendix B, Subparagraph B.11, Standard Conditions]*

Note: When prompted during signing, save the document under a new file name