

# **Year 7 Annual Report**

**New Hampshire Small MS4 General Permit**

**EXISTING PERMITTEES**

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

**North Hampton**

**Prepared By:**

**FB Environmental Associates, Adapted from Plans developed by  
Seacoast and Lower Merrimack Valley Stormwater Coalitions**

**Prepared For:**

**Town of North Hampton**

**EPA NPDES Permit Number NHR041024**

**Document Date – September 29, 2025**

# 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: Michael Tully	
Title: Town Administrator	
Signature: 	Date: 9/29/25

**Authorized Representative:**

The authorization letter is:

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

N/A

- Publicly available at the website:

N/A

**Primary MS4 Program Manager Contact Information:**

Name: <b>Michael Tully</b>		Title/Position: Town Administrator	
Department: Public Works Department			
Street Address: 237A Atlantic Avenue			
City: North Hampton		State: New Hampshire	Zip Code: 03862
Email: <a href="mailto:mtully@northhampton-nh.gov">mtully@northhampton-nh.gov</a> <a href="mailto:sspooner@northhampton-nh.gov">sspooner@northhampton-nh.gov</a>		Phone Number: 603-964-8087 603-964-6442	

# 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 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):

<https://www.epa.gov/npdes-permits/regulated-ms4-new-hampshire-communities>

Compliance activities have been identified and described in the North Hampton 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.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/north_hampton_swmp_2021.pdf">https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/north_hampton_swmp_2021.pdf</a>
Date SWMP was Last Updated: July 2021
IDDE Program Plan: See attached submission
Updated System Map : See Storm System Mapping, Appendix B of the IDDE plan linked above for the Drainage System map and Impaired Waters Map.
Updated SSO Inventory: Not applicable. The town of North Hampton has no sanitary sewer overflows.
Updated Inventory and Ranking of Outfalls/Interconnections with System Vulnerability Factors: See the “outfall Inventory and Priority Ranking Matrix” in the IDDE plan linked above.
Dry Weather Screening Data: see attachment B in the Nitrogen Source Identification Report included in this submission.
Wet Weather Screening Data: see attachment B in the Nitrogen Source Identification Report included in this submission.
Catchment Investigation Data: A written catchment investigation procedure was prepared in Year 1.5. Catchment and problem catchment investigation will be implemented based on the results of additional proposed wet weather screening data.
Illicit Discharge Removal Report: No illicit discharges identified.

Results from additional stormwater or receiving water quality monitoring reports or studies: Winnicut River Watershed Restoration and Management Plan (2017): <https://nhrivers.org/wp-content/uploads/2019/10/WinnicutRiverWRMP.pdf>

PTAP 2025 Nutrient Reduction Report: See attached submission for structural BMP installed in 2024. Specifications were submitted after the deadline for UNH nutrient reduction calculation. Calculated nutrient reduction will be provided in Year 8 annual report.

Salt Reduction Plan: Not applicable. However, the Town has prepared a Winter Maintenance Plan to be proactive in preventing an impairment. The Winter Maintenance Plan is available at this link: [https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/winter-road-maintenance-plan-northhampton\\_updated\\_august\\_2023.pdf](https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/winter-road-maintenance-plan-northhampton_updated_august_2023.pdf)

Annual Salt Usage Report N/A

Updated Nitrogen Source Identification Report: [https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/nitrogen-source-identification-reportpotential-structuralbmps-report-september2023\\_002.pdf](https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/nitrogen-source-identification-reportpotential-structuralbmps-report-september2023_002.pdf)

The Winnicut River is a tributary to an impaired waterbody, The Great Bay, however the segments of the Winnicut River within North Hampton are not impaired for nitrogen.

PTAP 2025 Nutrient Reduction Report: See attached submission for structural BMP installed in 2024. Specifications were submitted after the deadline for UNH nutrient reduction calculation. Calculated nutrient reduction will be provided in Year 8 annual report.

North Hampton Nutrient Tracking Program Report: N/A

Updated Phosphorus Source Identification Report: N/A North Hampton does not have a total phosphorous impairment.

PTAP 2025 Nutrient Reduction Report: See attached submission for structural BMP installed in 2024. Specifications were submitted after the deadline for UNH nutrient reduction calculation. Calculated nutrient reduction will be provided in Year 8 annual report.

North Hampton Nutrient Tracking Program Report: N/A

Street Sweeping Schedule: N/A North Hampton does not have a solids, oil and grease, or metals impairment.

Chloride Reduction Plan: N/A North Hampton does not have a chloride TMDL
Annual Salt Usage Report N/A

Lake Phosphorus Control Plan: N/A North Hampton does not have a lake and pond phosphorous TMDL.
PTAP 2025 Nutrient Reduction Report: See attached submission for structural BMP installed in 2024. Specifications were submitted after the deadline for UNH nutrient reduction calculation. Calculated nutrient reduction will be provided in Year 8 annual report.
North Hampton 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 checked="" type="checkbox"/> Bacteria/Pathogens	<input type="checkbox"/> Chloride	<input checked="" type="checkbox"/> Nitrogen*
<input 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

*\*The Winnicut River originates in North Hampton and is a tributary to the Great Bay, a waterbody impaired for nitrogen. However, the segments of the Winnicut River within North Hampton are not impaired for nitrogen. See updated list of receiving waters (based on the 2020/2022 303(d) Impaired Waters List) in the town’s IDDE plan.*

## 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:** None for impairments covered by the MS4 permit. Several watercourses are now also impaired for other parameters such as Dioxin, PCBs, pH, and mercury.

Assessment Unit ID	Assessment Unit Name	Impairment TMDL
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NHEST600031002-03	CHAPEL BROOK	Mercury, PCBs, Dioxin
NHOCN000000000-02-09	ATLANTIC OCEAN - STATE BEACH	Mercury, PCBs, Dioxin
NHOCN000000000-02-13	ATLANTIC OCEAN - NORTHSIDE PARK BEACH	Mercury, PCBs, Dioxin
NHOCN000000000-02-18	ATLANTIC OCEAN	Mercury, PCBs, Dioxin
NHOCN000000000-03-02	ATLANTIC OCEAN - BASS BEACH	Mercury, PCBs, Dioxin
NHOCN000000000-04	ATLANTIC OCEAN - CHAPEL BROOK	Mercury, PCBs, Dioxin
NHRIV600030901-02	WINNICUT RIVER - BARTON BROOK - MARSH BROOK - THOMPSON BROOK	Dissolved oxygen

**TMDL:**

The following assessment units have been added to the list of receiving waters that have TMDLs since the NOI was submitted:

Assessment Unit ID	Assessment Unit Name	Impairment TMDL
NHRIV600030901-02	WINNICUT RIVER BARTON BROOK MARSH BROOK THOMPSON BROOK	ESCHERICHIA COLI
NHEST600031004-10	LITTLE RIVER	FECAL COLIFORM
NHOCN000000000-02-09	ATLANTIC OCEAN - STATE BEACH1	ENTEROCOCCUS
NHOCN000000000-02-09	ATLANTIC OCEAN - STATE BEACH1	FECAL COLIFORM
NHEST600031002-03	CHAPEL BROOK	FECAL COLIFORM
NHRIV600031002-23	TRIBUTARY TO CHAPEL BROOK	ESCHERICHIA COLI

NHRIV600031002-24	CHAPEL BROOK	ESCHERICHIA COLI
NHOCN000000000-03-01	BASS BROOK BEACH OUTFALL AREA1	ENTEROCOCCUS
NHOCN000000000-03-01	BASS BROOK BEACH OUTFALL AREA1	FECAL COLIFORM
NHOCN000000000-03-02	ATLANTIC OCEAN - BASS BEACH1	ENTEROCOCCUS
NHOCN000000000-03-02	ATLANTIC OCEAN - BASS BEACH1	FECAL COLIFORM

The summary of the receiving waters has been updated in the IDDE Plan.

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 \_\_\_ outfall(s) have added.

A total of \_\_\_ outfall(s) have removed.

No

North Hampton 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:

Not Applicable

# Minimum Control Measures

## MCM 1: Public Education

Total number of all MS4 related educational efforts completed **during this reporting period**: 17

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

No.

Yes.

### 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” or municipally created flyers, mailers, postcards, videos, 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.

#### Targeted Audience:

Residential and Business and Institutions

#### Responsible Department/Parties:

The Department of Public Works was responsible for this MS4 outreach effort.

#### 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, mailers, or postcards that were distributed **during this reporting period**:

Year 7 = 0 flyers

Year 7 = 3,375 views of email blast sent out to the community via the Town’s Friday Folder’s newsletter.

Year 7 = 0 postcards

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

Year 7 = 0 impressions. North Hampton did not use social media for MS4 public outreach.

North Hampton Campaign Metrics (Location and number of people who viewed display at event, number of people who attended the public presentation, etc.) **during this reporting period.**

Approximately 200 people attended North Hampton’s “Old Home Day” on August 8, 2024.

Flyers related to pet waste and leaf and grass clipping disposal were available and distributed according to public interest.

**Goal was achieved.**

**Message Date:** Targeted outreach in spring of Year 7. Emails sent out each Friday in April and May, 2025. Old Home Day in August, 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 municipally created flyers, mailers, postcards, and/or brochures, with educational information about proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. Custom brochures were distributed through the Town Clerk’s Office at time of pet registration.

**Targeted Audience:**

Residents - Pet Owners

**Responsible Department/Parties:**

Town Clerk, Town Office, Library, and Public Works Departments were responsible for this MS4 outreach effort.

**Measurable Goal(s):**

Dog owners and 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 = 0. PREP “Every Drop” website not used.

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

Year 7 = 0 flyers

Year 7 = 0 mailers

Year 7 = 0 of postcards

Year 7 = 200 brochures

**Goal was achieved.**

**Message Date:** Time of animal license renewal. Flyers are regularly available at North Hampton Town Hall for the general public.

**BMP: Disposal of Leaf and Grass Clippings**

**Outreach Resources:**

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

**Description:**

North Hampton has implemented a composting effort/program through North Hampton's brush facility, allowing the public to drop off compostable materials at municipally-owned properties, and providing educational materials on the water quality benefits of composting, etc.).

North Hampton promotes disposal of leaf and grass clippings through brochures and Town wide e-mails on a regular basis as well as promoting collection and composting at the brush facility.

**Targeted Audience:**

Residential and Business and Institutions

**Responsible Department/Parties:**

Town Office, Town Recreation 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 = 0 flyers

Year 7 = 0 of brochures

Year 7 = 0 door hangers

Year 7 = 3,375 views of an email blast sent out to the community via the Town's Friday Folders newsletter.

North Hampton's Composting Program has received and processed 250 cubic yards of yard waste from residents and municipally owned properties **during this reporting period.**

**Goal was achieved.**

**Message Date:** Targeted outreach during summer and fall.

## **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, EPA, and/or municipally created brochures, letters, videos, and/or 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.

### **Targeted Audience:**

Septic System Owners

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

The Department of Public Works was responsible for this MS4 outreach effort.

### **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 = 0 brochures

Year 7 = 0 of letters

Year 7 = 3,375 views of an email blast sent out to the community via the Town's Friday Folders newsletter.

North Hampton Campaign Metrics (Location and number of people who viewed display at event, etc.) **during this reporting period:**

Approximately 200 people attended North Hampton's "Old Home Day" on August 8, 2024.

Flyers related to septic system maintenance were available and distributed according to public interest.

**Goal was achieved.**

**Message Date:** Fall of 2024, spring of 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:**

- Provide the Construction General Permit (CGP) outreach letter and fact sheets to developers, construction contractors, and other municipal or local organizations to educate them on the EPA 2022 Construction General Permit along with information on the selection, installation, and maintenance of construction related best management practices.
- 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:**

North Hampton Planning Department, Code Enforcement Department, Public Works 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.

Following is the number of fact sheets that were distributed to contractors, developers, and municipal or local organizations **during this reporting period:**

Year 7 = 3 of CGP fact sheets

Year 7 = 3 of BMP fact sheets

### **Goal was achieved.**

**Message Date:** At time of planning board approval.

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

Pet waste and septic system maintenance brochures are available at the Town Clerk's and other Town offices for residents to take when they visit. Site plan review process for planning board applications includes engineer review of stormwater management plans for new construction.

## 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 North Hampton 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) is publicly available for review at the North Hampton Town Clerk's Office and Town Library. Documents and records relating to the permit are retained and available for 5 years to the public at these Town locations as well as available online at the Town's MS4 website: <https://www.northhampton-nh.gov/public-works-department/pages/storm-water-management-plans>

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

No.

Yes. North Hampton made the following changes: N/A

**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.

North Hampton facilitated an "Old Home Day" on August 8, 2024. Information was provided on stormwater BMPs, and the public had opportunities to interact with Town officials and ask questions.

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

Not Applicable

# 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:  
N/A.

*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: 0%
- MS4 System Map was updated in Year 2 and there were no updates in Year 7.
- North Hampton'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:

Not Applicable. No changes in MS4 system since Phase I mapping.
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## 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 N/A.

*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 was updated in Year 7 and the IDDE Program Plan was revised as a result. The revised inventory and ranking of outfalls/interconnections can be found in submission.

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

Dry weather screening was not performed in Year 7.

### 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.

**Number** of outfalls screened **during this reporting period**: 3

**Percent** of total known Problem Outfalls and outfalls/interconnections that identify sewer input screened **to date (Year 1 – Year 7)**: 0%

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

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

All three of North Hamptons MS4 outfalls were inspected during wet weather conditions in Year 7. Two outfalls were observed to be flowing at the time of the inspection, and were sampled for wet weather parameters. The third outfall was not observed to be flowing during wet weather conditions and was therefore not sampled. Refer to the wet weather sampling report included as a separate file as part of this submission.

### 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 ##website link. N/A

**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:

No Problem Outfalls or Problem Catchments have been identified. Results of the wet weather screening performed during Year 7 were inconclusive due to elevated detection limits of the field test kits used for surfactants and chlorine. Additional wet weather screening is proposed for Year 8, and priority ranking of outfalls/catchments will be revised if necessary based on sampling results.

## 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 in submission **and/or** at the following website.

Number of illicit discharges identified **during this reporting period**: 0

Number of illicit discharges removed **during this reporting period**: 0

Estimated gallons of flow removed **during this reporting period**: 0 gallons/day

Total number of illicit discharges identified **since the effective date of the permit (July 1, 2018 – June 30, 2025)**: 0

Total number of illicit discharges removed **since the effective date of the permit (July 1, 2018 – June 30, 2025)**: 0

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

No illicit discharges have been identified in connection with North Hampton's MS4 system.

## Employee Training

- Provided training to employees involved in IDDE program *during this reporting period*:

North Hampton Public Works staff were trained using IDDE training videos and a written IDDE SOP created by UNH, the City of Dover, and NHDES. Video topics included collecting data and water samples in the field, analyzing for pertinent parameters as identified in the permit, how to identify an illicit discharge, and general IDDE sampling protocols. Training logs are included in Appendix F of the IDDE Program Plan.

In addition, North Hampton 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.

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

The Town of North Hampton completes annual training in the spring of each reporting year utilizing in house training/discussions, videos, and seminars when available. Samples are collected and analyzed by contracted environmental professionals who are also trained on and familiar with MS4 sampling requirements.

## 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*: 4

Number of inspections completed *during this reporting period*: 0

Number of enforcement actions taken *during this reporting period*: 0

North Hampton 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:

Not Applicable
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# MCM 5: Post-Construction Stormwater Management in New Development and Redevelopment

## As-built Drawings

Number of as-built drawings received *during this reporting period*: 0

## Local Regulations Assessment Report

- The **Assessment Report** was evaluated and no updates were recommended *during this reporting period*.
- The **Assessment Report** was evaluated and updates were recommended *during this reporting period*.
- 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 and/or Guidelines** 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*. Following are the recommended updates: N/A
- 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*. Following are the recommended **and/or** planned updates: N/A
- 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

- North Hampton 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:** 7 out of the top 8 properties identified in the hot spot mapping are permittee-owned properties within the MS4 regulated area. Below are the physical addresses for these properties. Properties marked with an astrix (\*) were identified as potentially being suitable candidates for BMP construction and retrofits, either due to their site factor feasibility/suitability and/or due to recent redevelopment and improvements completed at the property.

1. North Hampton Recycling Center\*; 14 Cherry Road
2. North Hampton Public Library\*; 239 Atlantic Avenue
3. North Hampton Town Hall\*; 237A Atlantic Avenue
4. Town Property\*; 233 Atlantic Avenue
5. Town Property; 231 Atlantic Avenue
6. Center Cemetery\*; 196 Post Road
7. North Hampton Highway Department; 10 Airport Road

**List of Non-MS4 Properties:** 1 out of the top 8 properties identified in the hot spot mapping are permittee-owned properties outside the MS4 regulated area.

1. Dearborn Park; Rt. 111/Exeter Road

- North Hampton has modified or retrofitted the following MS4 properties with BMPs to mitigate impervious area 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:** North Hampton's safety complex, located at 233 Atlantic Avenue was rebuilt in 2023. Stormwater runoff from impervious areas as well as the garage bays of the fire and police department is captured and directed to an engineered stormwater infiltration system that was constructed beneath the parking lot area.

**List of Non-MS4 Properties:** 0 of the permittee-owned properties outside the MS4 regulated area.

Provide any additional relevant details, in the box below:

The Street Design and Green Infrastructure Regulatory Assessment Report and Inventory and Priority Ranking of Permittee-Owned Properties under MCM 5 were completed in Year 5 and were submitted as attachments to that report.

# 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:
  - A schedule for catch basin cleaning has been established with the goal of ensuring that a catch basin should not be more than 50% full.

Number of catch basins inspected **during this reporting period:** 90

Number of catch basins cleaned **during this reporting period:** 24

Total volume **or** mass of material removed from **all** catch basins **during this reporting period:** 6 cubic yards.

Total number of catch basins within the MS4 system: 70

## 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.

All curbed roadways were swept at least once **during this reporting period.**

Number of (lane) miles swept **during this reporting period:** 62

Volume of swept material **during this reporting period:** 3 cubic yards.

## Stormwater Pollution Prevention Plan (SWPPP)

North Hampton 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*: 0

Describe any corrective actions taken at a facility with a SWPPP: 0

No corrective actions necessary.

### 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:

Not Applicable.

# 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:

Not Applicable.

## 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: N/A  

North Hampton is utilizing **some or all** of the Voluntary Municipal Green SnowPro Certification Program resources and trainings as outlined in North Hampton’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 and submitting it to NHDES and can be found in submission **and/or** at the following website N/A. 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:

North Hampton does not have a chloride impairment. This section is not applicable to the Town. Nevertheless, the Town of North Hampton has developed a Winter Maintenance Plan and has implemented procedures outlined in the document. The plan is posted online at the Town’s MS4 website and is available at the following link: [https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/winter-road-maintenance-plan-northhampton\\_updated\\_august\\_2023.pdf](https://www.northhampton-nh.gov/sites/g/files/vyhlf996/f/pages/winter-road-maintenance-plan-northhampton_updated_august_2023.pdf)

## 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: N/A
- The Nitrogen Source Identification Report was **updated during this reporting period** and can be found in submission. 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

- North Hampton 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.** North Hampton plans to install a structural BMP(s) on N/A.
- North Hampton 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 in 2024. The type of structural BMP(s)

that was installed was an Infiltration Trench. 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 North Hampton 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. The total estimated nitrogen removed from the installed BMP(s) has not yet been calculated.

North Hampton 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 North Hampton 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 North Hampton 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 **North Hampton's Tracking Program** in submission **and/or** at ##website link. The total estimated nitrogen removed from the installed BMP(s) is N/A.
- 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:

A structural BMP was installed in 2024 at the Town of North Hampton Public Safety Complex, located at 235 Atlantic Avenue. BMP specifications have been entered into the PTAP database. However, the information was entered after the deadline for UNH nutrient reduction calculations. Nutrient reductions associated with this BMP will be calculated and reported in Year 8.

## 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.**
  - 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.**

### 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 in submission **and/or** at the following website; N/A.
- The Phosphorus Source Identification Report was **updated during this reporting period** and can be found in submission **and/or** at the following website: N/A. 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.
- North Hampton 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.** North Hampton plans to install a structural BMP(S) on N/A
- North Hampton 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 N/A. The type of structural BMP(s)

that was installed was N/A. 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.

- North Hampton 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 N/A. The type of structural BMP(s) that was installed was N/A. 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 North Hampton 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** in submission. The total estimated phosphorus removed from the installed BMP(s) is 0 lbs/year.

North Hampton 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 North Hampton 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 North Hampton 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 **North Hampton's Tracking Program** in submission. The total estimated phosphorus removed from the installed BMP(s) is 0 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:

North Hampton does not have a phosphorous impairment. This section is not applicable to the Town.

## 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.*** North Hampton’s street sweeping schedule can be found in submission.

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

North Hampton does not have a solids, oil and grease, or metals impairment. This section is not applicable to the Town.

## 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.

North Hampton is utilizing **some or all** of the Voluntary Municipal Green SnowPro Certification Program resources and trainings as outlined in North Hampton'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.

North Hampton 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, submitting it to NHDES, and can be found in submission **and/or** at the following website N/A. 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:

North Hampton does not have a chloride TMDL. This section is not applicable to the Town.

# 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 N/A.

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

North Hampton does not have a lake and pond phosphorous TMDL. This section is not applicable to the Town.

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

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

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

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

North Hampton is utilizing a scaled back approach to Pbase recalculations with assistance from the UNH Stormwater Center. Due to limited funding and available mapping resources, North Hampton 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]: 0

Current phosphorus export rate from the LPCP Area in lbs/year [=A-(B+C)+D from above]: 0

## Non-Structural Controls

- North Hampton 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 North Hampton's written Lake Phosphorus Control Plan which can be found in submission **and/or** at the following website: N/A.
- North Hampton 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 North Hampton written Lake Phosphorus Control Plan which can be found in submission **and/or** at the following website N/A.

North Hampton 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 North Hampton 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

- North Hampton 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 North Hampton 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.
- North Hampton has installed **structural control measure(s)** within the Lake Phosphorus Control Plan area **during this reporting period or during previous reporting periods**. North Hampton 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 N/A.

North Hampton 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 North Hampton 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:

North Hampton does not have a lake and pond phosphorous TMDL. This section is not applicable to the Town.

# 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 included with this submission.

:

Wet Weather screening was performed for North Hampton's outfalls during Year 7. The Wet Weather sampling report is included with this submission.

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

North Hampton 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

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