

Phase II Questionnaire Results

Introduction

Four questionnaires were sent to New Hampshire communities regarding Phase II. The first went to Town Managers/Administrators and/or Mayor's offices and asked questions related to budgeting and assignment of responsibility. Since most questionnaires by direct mail typically receive only a 1-3% response rate, the response rate was fairly high at 10%.

The second went to Directors of Public Works and/or Town Engineers or Highway Superintendents depending on the community. This questionnaire asked about physical facilities, such as the number and cleaning methods for catch basins, and information about needs and budgeting. CEI received a 6% response rate to this questionnaire.

The third questionnaire went to Town Planners or Planning Board Chairmen, depending on the community. This questionnaire asked about existing bylaws and regulatory issues related to Phase II. The response rate was excellent at 12%.

The final questionnaire went to Boards of Health, typically to the agent/officer, and requested information on illicit discharge handling and on impacts the BOH's had seen on water quality at beaches from storm drain discharges. A very high response rate of 20% was received.

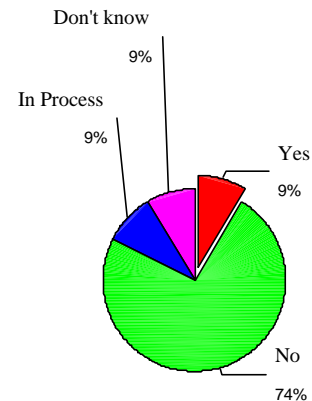
Together, the answers to the questionnaires from each department give a fairly comprehensive picture of the level of understanding and some of the issues related to Phase II implementation. The results are described and shown pictorially below by question.

Questionnaire 1: Town Administrators/Managers/Mayors' Offices

Question #1: Town Administrators, has a Phase II coordinator been appointed?

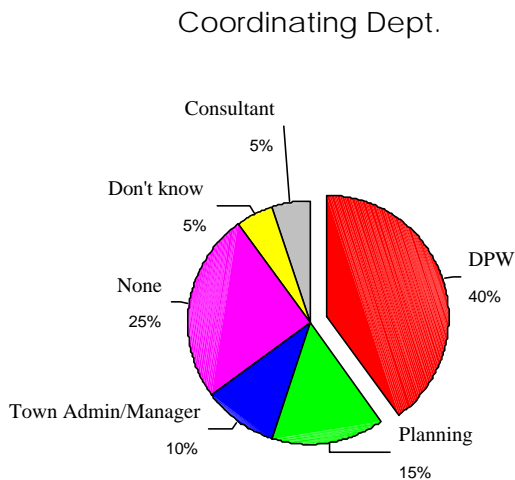
This question was posed to identify whether communities were preparing for Phase II. EPA requested that a Phase II contact be designated in a letter sent out in late 2000, but only 9% of the respondents to CEI's questionnaire said they had appointed a coordinator. Another 9% were in the process of appointing someone. The coordinator is an important position because of the interdepartmental issues with Phase II. At a minimum, public works, conservation, health and planning are all involved in some way, and coordinating between departments may be the biggest challenge in some communities.

Phase II Coordinator?



*Due to software constraints, figures may not add up to 100%

Question #2: Town Administrators, who is the coordinating department?



Most responding communities have appointed the Department of Public Works/Engineering to be the coordinator, although several had appointed either the Town Manager, the Town Planner or an outside consultant to be the coordinator. There is no specific requirement from EPA or DES that one or the other department be the coordinator, although DPW's often wish to have the role because of their responsibilities for maintaining the stormwater "conveyances," as referred to in the Phase II rule.

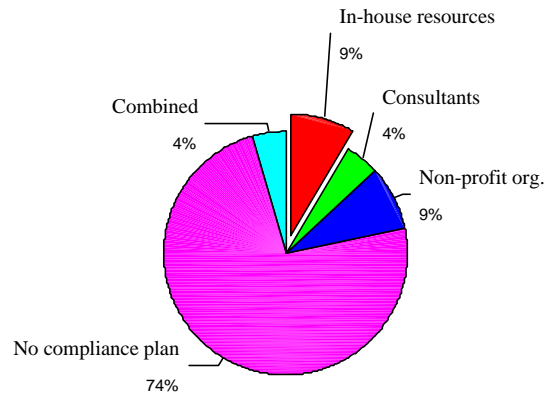
Question #3: Town administrators, how will you handle compliance?

The most significant compliance work under Phase II includes:

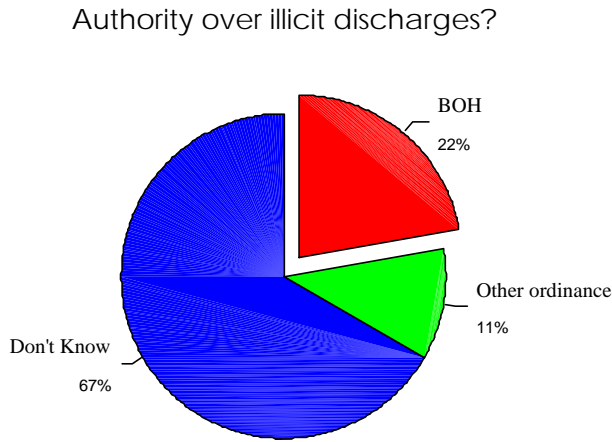
- the development of a stormwater management program
- delineation of storm drain discharges
- sampling of dry weather flows to identify “illicit discharges”
- correction of illicit discharges
- extensive public education and outreach
- several regulatory changes, mostly at the planning board level
- oversight of erosion/sedimentation controls on construction sites over one acre
- drainage controls on municipal facilities such as DPW yards
- employee training

9% of the respondents who have a plan for compliance said that they planned to use in-house resources, while an equal amount planned to have compliance handled through a non-profit organization. 4% planned to use a combination of in-house resources and outside consultants, and an additional 4% planned to have the whole issue handled by a consultant. 74% had no plan or didn't know how they would handle the situation as of yet.

Plans for compliance



Question #4: Town Administrators, does your community have the authority to force private property owners to correct illegal connections? If so, what type of authority is it?

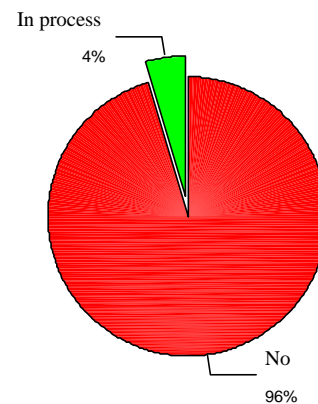


22% of respondents stated that the Board of Health has the authority to force owners of illegal connections to correct the problem. 11% stated that the authority falls under another community ordinance. The remaining 67% of respondents stated they do not know if the community has this authority. If the authority is not clear in the town's bylaws, then it is supposed to be added under Phase II. While many communities may not believe they have any illegal connections, CEI's experience has been that there are almost always a few in urbanized areas, although they may not have been detected yet.

Question #5: Town Administrators, have you budgeted for compliance yet?

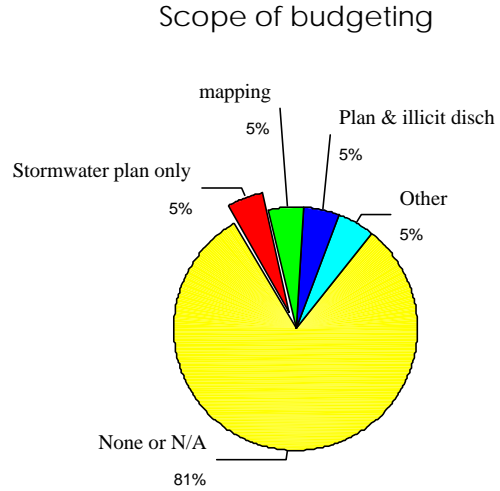
Considering the deadline of February 2003 for the Storm Water Management Program and Notice of Intent, a surprising 96% of communities have not yet begun to deal with the issue. Considering the coordination required between departments, considerable time may be required to decide exactly how to comply and what to put in the Storm Water Management Program. However, because of the cross-department requirements, it is likely that many communities are awaiting further guidance and understanding before going forward. The technical components of Phase II are likely daunting to many, and we believe the low number of communities proceeding is a reflection of this problem.

Have you budgeted for compliance?



Question #6: Town Administrators, if you budgeted for Phase II, what did you include in the scope?

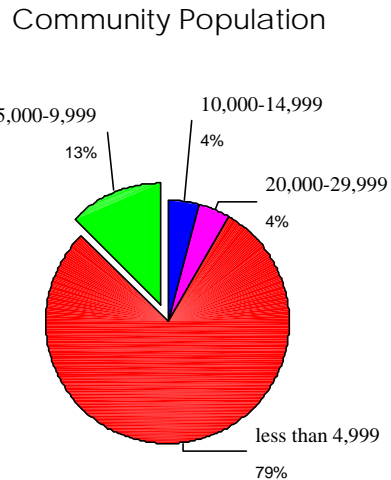
Only 20% of the respondents have planned a scope for Phase II compliance including the elements of mapping, stormwater planning, illicit discharge detection, or some combination thereof. Although the Storm Water Management Program is not due until February 2003, the coordination required between departments suggests that beginning now, as these communities are, will allow a better program to be developed. Since the program must outline compliance actions for a 5-year period and cover a range of issues, communities that don't begin work until July of 2002 may find this to be a tight timeframe.



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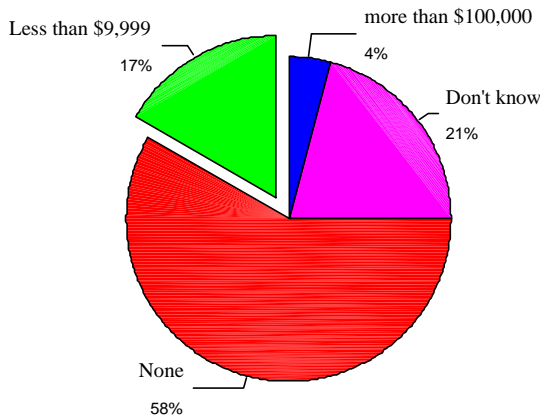
Question 7: Town Administrators, what is your community's population?

The bulk of the respondents (79%) have a population of less than 5,000. 13% were from communities of 5,000-9,999. An equal number (4%) of communities reported populations of 10,000-14,999 and 20,000-29,999.



Question #8a: Town Administrators, what are your expected expenditures for Fiscal Year 2002?

Expected expenditures for 2002

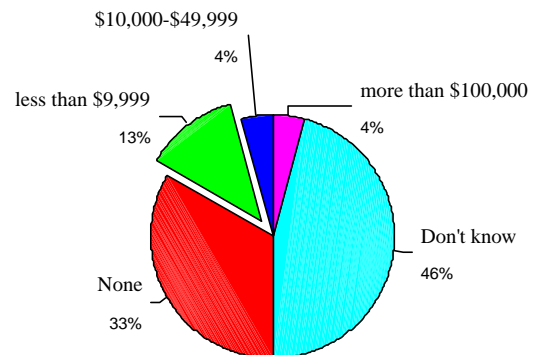


About 4% of the respondents said they plan to spend more than \$100,000 on Phase II compliance in FY 2002. These are most likely the larger CSO communities, or small communities that may have consent orders that require storm water management expenditures or early compliance with Phase II. About 17% of the respondents plan to spend less than \$10,000. These communities may be doing early, phased compliance activities to allow the development of a better program. The remainder of the communities who filled out questionnaires either do not plan to spend anything or did not know what was budgeted for this purpose.

Question #8b: Town Administrators, what are your expected expenditures for FY 2003?

Not surprisingly, nearly 46% of the respondents have not planned their budgets for FY 2003, while another 33% do not expect to spend any money for Phase II compliance in 2003. This may reflect a lack of understanding of what will have to be done. Roughly 21%, however, do expect to spend some money for compliance in the fiscal year that the program is due. Most of these expect to spend less than \$10,000 for compliance. CEI's estimates show that most communities with populations of 5,000 to 35,000 will spend between \$10,000 and \$50,000 for a reasonably responsive Storm Water Management Program that sets out cost-effective "measurable goals" for the compliance period of 2003-2008, not including costs of any mapping, illicit discharge detection or other actual compliance actions. Less developed communities will spend less, while more urbanized communities may spend much more as some already have. Some communities under Consent Orders have spent several hundred thousand dollars already.

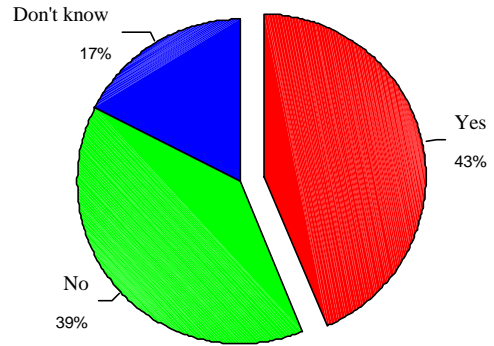
Expected expenditures in 2003



Question 9: Town Administrators, would/did you consider cooperating with neighboring communities to do some components of Phase II, such as the public education/outreach components, if there were cost savings but potentially more coordination required?

Most responding town administrators (43%) said they would cooperate with neighboring communities in complying with Phase II. 39% said cooperation was not a consideration. Cooperation could occur in almost any form, for example, by joining together to do portions of the work or to share regulatory language or public education information and mailing costs.

Cooperation with neighboring communities?

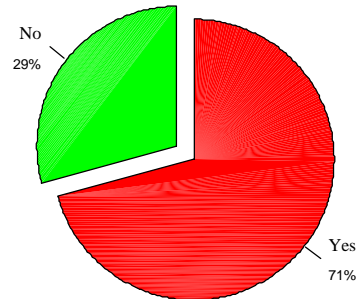


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Question #10: Town Administrators, what type of assistance would be helpful?

The large majority of the responding Town Administrators (71%) would like more assistance with compliance, and based on the questions, more technical information on implementation in particular is needed.

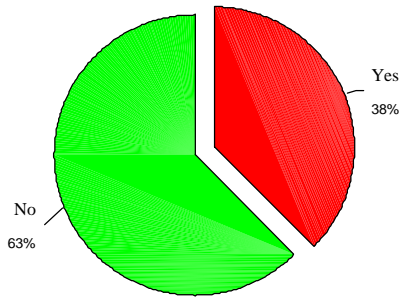
Would assistance be helpful?



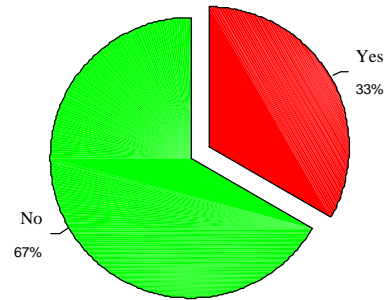
Town administrators were asked what types of technical assistance they would like. While no respondents expressed interest in one-on-one technical training, there was some interest in general workshops (21%), but more Town Administrators believed that implementation workshops (38%) and examples of stormwater management programs (33%) were needed.

Phase II knowledge amongst Town Administrators responding to the questionnaire seems to have reached a point where specific implementation workshops for staff is desired.

Workshops with specific Phase II info?

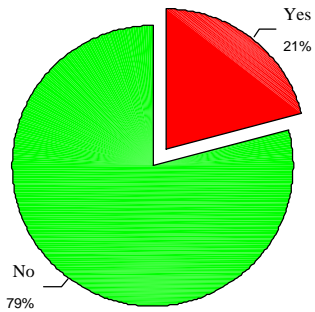


Examples of stormwater management programs?



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Need general workshops?



Need other assistance?

