Municipality/Organization: **Town of Hollis, New Hampshire**

EPA NPDES Permit Number: **NHR041011**

Annual Report Number & Reporting Period: **No. 2: March 05-March 06**

PV
Received 5-4-06

NPDES PII Small MS4 General Permit Annual Report

Part I. General Information

Contact Person: Cath Hallsworth

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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 gather and evaluate 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.

Signature: Catharine W. Hallsworth

Printed Name: Catharine Hallsworth

Title: Administrator for the Board of Selectmen

Date: March 27, 2006

Part II. Self-Assessment

The Town of Hollis, New Hampshire has completed the required self assessment and has determined that the community is in general compliance with the MS4 permit requirements. During Permit Year Three, the Town of Hollis was able to sustain and expand the local stormwater management initiative. The following is a general summary of our progress.

Public Education: The Town of Hollis continues to provide a variety of written resource materials to educate and inform the public of the need to improve local stormwater management. In addition, a section of the municipal website has been designed and dedicated to the distribution of information describing local stormwater management activities. This resource also provides tips and suggestions outlining how local residents can support these efforts. The town continues to provide municipal staff with periodic training and updates as new employees are hired and as new issues are identified. The community has approached the Nashua Regional Planning Commission to propose that the member communities work together to identify or develop a single curriculum that all twelve communities could use. We believe this approach will enable the collaborative to develop a more comprehensive educational program while also conserving limited municipal resources.

Public Participation: The Town of Hollis Stormwater Committee sponsored a series of public meetings to discuss local storm water management activities during permit year three. Each of these meetings was announced and posted in accordance to the New Hampshire open meeting requirements. The public is invited to attend these meetings. The meeting notices and minutes are also posted on the municipal website as a means to enhance public access to this information. The Town of Hollis is continuing to explore ways to make the local website more user friendly while also posting informational notices at public facilities as a means to keep the general public informed of local storm water activities and where interested parties can make inquiries.

Illicit Discharge Detection & Elimination: During permit year three, the Town of Hollis continued inspecting the shore line of each of the streams located in permit area. The purpose of this effort was to locate and identify any outfalls or illicit discharges draining into these waterbodies. All the streams located in the permit area have now been surveyed as part of this effort. No illicit discharges or outfalls have been detected to date. In the event that an illicit discharge is discovered, the Town of Hollis will attempt to visually trace the illicit discharge to its source. If this is not possible, then the Town would consider local land uses and use visual and olfactory observations in order to establish a sampling protocol to characterize the discharge. The information gained from this effort would be used to better identify potential sources and focus the municipal investigation. In cases, where it was not possible to

visually trace a pipe or discharge back to the source, the Town would introduce non-toxic dye into the suspected source of the illicit discharge as a means to confirm the source of the discharge. A second option would be to initiate a smoke test as a means to identify the source of the discharge. Another option would be to block the illicit discharge and monitor the area for a backup. Once the source had been identified, the Town would order the elimination of the illicit discharge. Dry weather sampling and analysis will commence upon discovery of an illicit discharge.

During permit year three, the Town of Hollis drafted a local regulation to enhance its ability to investigate and eliminate any illicit discharges found in the community. This regulation is currently being reviewed by a variety of local officials including members of the Hollis Planning Board, Conservation Commission, Department of Public Works and Building Inspector. Pending the adoption of a local regulation the Town of Hollis will utilize the authority granted by the State of New Hampshire health regulations governing the installation and use of septic systems to investigate illicit discharges detected in town. Based on the rural nature of the community, it is anticipated that any illicit discharge detected in town is most likely to be related to improper septic discharges, floor drains, sump pumps or the re-direction of springs and surface water. The Town of Hollis will continue to investigate and resolve all illicit discharges discovered during this effort.

The Hollis Storm Water Committee also reviewed the water quality status of the local rivers, streams and ponds to identify waterbodies that have been designated by the New Hampshire Department of Environmental Services or the U.S. Environmental Protection Agency as impaired. Five local waterbodies were found to have diminished water quality. Local impaired waterbodies include: the Nashua River, Silver Lake, Flint Pond, Pennichuck Brook and Muddy Brook. Only the Nashua River and Flint Pond are located within the Hollis permit area. A review of the existing state and federal databases determined that a Total Maximum Daily Limit (TMDL's) has not been established for the contaminants of concern noted in any of these waterbodies in Hollis. The Town of Hollis has informed local land use review officials of the status of these waterbodies and advised local officials to promote measures that will aid in the maintenance or improvement of local water quality. The community is also exploring options for using this information to support local outreach efforts and seek greater resident participation in local environmental management.

Construction Site Runoff Control: Historically, the Town of Hollis has used the site plan review process and several municipal zoning ordinances to require the implementation of enhanced land use planning provisions that promoted environmental stewardship and aquifer protection. The Town routinely requires developers to initiate engineering controls and construction management practices to treat storm water and protect the quality of the local aquifer. The Town of Hollis uses municipal

regulations in conjunction with the State of New Hampshire Site Specific Permit and Erosion Control permitting requirements to promote effective erosion control and storm water management at local construction sites.

The Town of Hollis drafted a storm water management ordinance during permit year two. This document is currently undergoing review and revision. One goal of this regulation is to create a single standard that outlined local storm water management design specifications and construction requirements. The proposed regulation lists a variety of construction site runoff control measures to be adopted by the community. The draft bylaw has been formally presented to the Hollis Board of Selectmen and Planning Board. The regulation is currently undergoing revision to address the comments raised by local land use officials. In the interim, pending the adoption of the proposed regulation, the Town of Hollis will continue to adopt a variety of storm water treatment requirements during the local site plan review process as authorized by the existing regulations. This has been the past practice of the town and will continue. The following are examples of storm water management practices that the Town of Hollis has routinely adopted during the site plan review process:

- The existing zoning regulations have established limits on the amount of impervious surface that may be constructed in the various planning districts based on potential site use and the environmental sensitivity of the general area.
- The Town often seeks to maximize the infiltration of clean surface run-off as a means to recharge the local aquifer.
- All applicants are required to prepare Erosion Control and Drainage Management plans for their projects. These plans must specify preventive measures to be implemented to protect local resource areas and to prevent re-location of sediment.
- The Town periodically inspects local construction sites to ensure that the Erosion Control and Drainage Management plans are being effectively implemented. Where necessary, the Town initiates enforcement action to ensure that all deficiencies are corrected.
- The Town now requires all sites covered by Phase II of the National Pollutant Discharge Elimination System requirements to submit a copy of their federal Notice of Intent, Storm Water Pollution Prevention Plan, and weekly site inspection reports to the Town. This practice enhances the ability of the community to more effectively monitor local compliance with these requirements.

These practices will continue.

When the Town of Hollis originally developed its storm water implementation schedule it had proposed to develop a fee schedule

to support the inspection and maintenance of drainage systems located within the MS4 permit coverage area. This task was scheduled to be completed during Permit Year 3. This task has been postponed for completion until Permit Year 4 because the Town of Hollis is in the process of conducting a comprehensive review and revision the entire municipal fee schedule at this time. The development and adoption of drainage inspection and maintenance fee schedule will be included as part of this all encompassing review.

Post Construction Runoff Control: Since 2001, the Town of Hollis utilized the municipal zoning ordinance to incorporate a series of enhanced land use planning provisions that promoted environmental stewardship and aquifer protection into local site design. These standards established a number of local standards which required developers to design all construction projects with enhanced storm water treatment which provided pollutant attenuation, mitigated peak volumes and promoted infiltration of treated surface run-off. The Town of Hollis has used these regulations in conjunction with the State of New Hampshire Site Specific Permit and Erosion Control permitting requirements to promote effective long-term erosion control and storm water management at local construction sites.

The Town of Hollis drafted a storm water management regulation during permit year two. One goal of this regulation was to create a single standard that outlined local storm water management design specifications and construction requirements. The proposed regulation lists a variety of construction site runoff control measures to be adopted by the community. The draft bylaw has been presented to the Hollis Board of Selectmen and Planning Board for review. The regulation is currently undergoing revision to address the comments raised by local land use officials. Pending the adoption of the proposed regulation, the Town of Hollis will continue to adopt a variety of storm water treatment requirements during the local site plan review process as authorized by the existing regulations. This has been the historic practice of the town and will continue. The following are examples of storm water management practices that the Town of Hollis has consistently adopted during the site plan review process:

- The existing zoning regulations have established limits on the amount of impervious surface that may be constructed in the various planning districts based on the potential site use and environmental sensitivity of the general area.
- The Town often seeks to maximize the infiltration of clean surface run-off as a means to recharge the local aquifer.
- The Town routinely requires the development of drainage designs that provide pollutant attenuation, volume and flow mitigation.
- All applicants are required to prepare Erosion Control and Drainage Management plans for their projects. These plans must

specify preventive measures to be implemented to protect local resource areas and to prevent re-location of sediment.

- The Town often requires the submittal of a drainage maintenance plan for commercial sites.
- The Town periodically inspects local construction sites to ensure that the drainage system is installed as originally proposed. Where necessary, the Town initiates enforcement action to ensure that all deficiencies are corrected.

These practices will continue.

Municipal Good Housekeeping: The Town of Hollis has historically sponsored a routine drainage maintenance and street sweeping program. This program continued during permit year three. The Town has worked with the University of New Hampshire to inspect and catalog the drainage structures located in the permit area. This information has been incorporated into the municipal computer database. The community has also examined storm water treatment practices at the Highway Garage, Transfer Station, Stump Dump, and the Fire and Police stations. Significant operational and drainage improvements were constructed and implemented at each of these facilities during permit year three. A new salt barn has been constructed at the Highway Garage. Holding tanks and enhanced storm drainage have been installed at both the Fire and Police Stations. These improvements will improve local water quality at each of these facilities. The Town of Hollis has also initiated operational improvements and site modifications at the municipal Stump Dump and Transfer Station as a means to prevent pollution and improve the treatment of storm water. These activities have reduced the environmental impact of municipal operations while also serving to protect local water quality.

In addition, the Town of Hollis also provides a number of disposal programs for local residents. Historically, the Town of Hollis has participated in the Nashua Regional Household Hazardous Waste Collection program. This program sponsors seven collection events where local residents can safely dispose of a range of chemical waste commonly found in the home. Residents can also bring waste oil, antifreeze, automotive batteries, and ashes to the Hollis Transfer Station for safe disposal. These efforts help to safeguard local water quality by providing residents with several options to safely disposal of hazardous materials. This approach helps to alleviate the risk that these materials will be discarded in such a manner that could threaten local water quality.

Additional information: The Town of Hollis continues to collaborate with the Nashua Regional Planning Commission and the New Hampshire Department of Transportation on regional stormwater management concerns. This group meets on a quarterly basis to share information and to investigate opportunities to where the communities can work together to support regional storm

water management efforts.

These efforts will continue during permit year four.

Part III. Summary of Minimum Control Measures

1. Public Education and Outreach

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
2.1.A	Continue availability of brochures & pamphlets at Town Hall	Board of Selectmen	Provide pamphlets at Town Hall relating to Storm Water	Provided storm water pamphlets at Town Hall. Modified municipal storm water website to provide additional information to the public. Municipal staff researched a number of storm water surveys utilized by other communities. After much discussion the Town has opted to not initiate a survey at this time. The Town has chosen to instead expand its outreach efforts to include displays at a variety of public events and festivals.	The Town will continue to expand and modify its outreach effort. News releases and public service announcements are planned for this year. Additional information will be added to the municipal website.
Revised	*The Town of Hollis decided to not survey local residents regarding storm water management at this time. The Town will instead focus on expanding the existing outreach program with an informative mailer.*				
2.1.B	Training on storm water for all Town of Hollis Municipal Employees	Department of Public Works	Train Police and Fire Personnel on NPDES	Provided Fire and Police personnel with additional training in effective storm water management.	Continuing providing storm water management training to municipal staff as a means to re-enforcement storm water awareness and promote the implementation of good housekeeping practices
Revised					
2.1.C	Develop educational material for Hollis School District	Board of Selectmen	Prepare educational material for local schools describing effective storm water management.	Hollis continues to research and explore different methods for introducing storm water management into the local school curriculum.	Hollis will continue efforts to develop educational material to be used by local school districts. Continue to provide updated brochures on storm water to the public.
Revised					
Revised					

2. Public Involvement and Participation

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
2.1.A	Using current methods notify the Town of Storm Water Pollution Prevention Plan Implementation	Board of Selectmen	Public notification • Cable • Newspaper • Municipal Website	Hollis sponsored four public meetings to discuss local storm water management goals and practices. The Town has also extended an invitation for local residents to join the Storm Water Committee on the municipal website.	The Town proposes to continue sponsoring a series of advertised public meetings to keep the community informed of local storm water management activities. The Town is also exploring the option of working with local environmental groups to augment the existing educational program.
Revised					
2.2.B	Hold public forum to discuss the implementation of the Phase II permit and compliance	Board of Selectmen	Public Hearing • Conservation • Planning Bd • Selectmen • Storm Water Committee	Hollis sponsored four public meetings to discuss local storm water management goals and practices.	The Town of Hollis will conduct a series of public meetings with Hollis Conservation Commission, Planning Board and Board of Selectmen to review the development and implementation of the proposed storm water regulations.
Revised					
2.2.C	Hold NPDES Phase II Committee Public Meeting	Board of Selectmen	Convene public meetings to discuss local storm water management efforts	The Hollis Storm Water Committee held four public meetings to discuss local storm water management activities.	The Hollis Storm Water Committee will continue to sponsor a series of public meetings to review and discuss local storm water management activities.
Revised					

2.2.D	Develop storm water pollution hotline	Board of Selectmen	Establish means for community to file storm water complaints or pose inquiries	A Storm Water website has been installed on the municipal website. This page lists the name and email address for the local Storm Water Committee members. This approach offers the community multiple contacts to seek information regarding the local program or to report a problem.	The municipal website will be periodically updated to provide new and expanded information to the general public describing local storm water management activities while also offering tips and suggestions for the home owner.
Revised	*A dedicated hotline will not be established. Instead the town will utilize the municipal website, email and public postings to advise the public to contact various members of the local Storm Water Committee for more information.*				
2.2.D					
Revised					
2.2.D					
Revised					

3. Illicit Discharge Detection and Elimination

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
2.1.A	Begin implementation of mapping system for outfalls and discharges in permit coverage area	Department of Public Works	The drainage system located in permit area has been mapped.	The Town has continued efforts to locate and map additional drainage structures and outfalls located in the community. The Town has begun to request additional utility mapping data from developers during site construction as a means to expand and maintain the current drainage database.	The town will continue efforts to locate and map additional drainage structures and outfalls located in the community.
Revised					
2.1.B	Locate and map additional illicit discharges in permit coverage area	Department of Public Works	Survey for outfalls in permit coverage area	Surveyed two streams located in permit area for illicit discharges. No illicit discharges were detected.	Continue surveying streams located in the permit area for illicit discharges.
Revised					
2.1.C	Begin dry weather testing at outfalls and discharges located in permit coverage area	Department of Public Works	Conduct dry weather sampling of illicit discharges or suspected outfalls	No illicit discharges were detected during the survey of two streams located in the permit area.	Continue surveying streams located in the permit area to monitor for illicit discharges. All illicit discharges located during this effort will be subjected to dry weather testing to determine their potential impact on local water quality.
Revised					
Revised					
Revised					
Revised					

4. Construction Site Stormwater Runoff Control

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
2.1.A	Draft new bylaw to address permitting and enforcement for storm water outfalls in the permit coverage area	Planning Board	Draft ordinance for review and approval by community.	A Storm Water Management Bylaw has been drafted. Based on local comments, this document will be revised and developed into three separate regulations that relate to storm water management. These documents are currrently undergoing local review.	Complete the review and revision of the proposed regulations. Educate and inform the public of the need for the regulations. Seek adoption of the regulations by the Board of Selectmen.
Revised					
2.1.B	Hold public forum to discuss Phase II compliance and the adoption of the local regulations.	Board of Selectmen	Convene public meeting to discuss local storm water effort and the proposed bylaw.	The Hollis Storm Water Committee met four times during permit year 3. The status of the storm water regulations was discussed at each of these meetings.	Present revised regulations to the Hollis Board of Selectmen, Planning Board and Conservation Commission for review and approval.
Revised					
Revised					
Revised					
Revised					
Revised					

5. Post-Construction Storm water Management in New Development and Redevelopment

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
2.1.A	Draft new bylaw to address permitting and enforcement for storm water outfalls in the permit coverage area	Planning Board	Draft ordinance for review and approval by community.	Drafted Stormwater Management Bylaw. The draft is currently undergoing local review.	Complete the review and revision of the proposed regulation. Educate and inform the public of the need for the regulation. Seek adoption of the regulation by the Hollis Board of Selectmen. Develop a fee schedule for use with the bylaw.
Revised					
2.1.B	Hold public forum to discuss Phase II compliance and the adoption of the local bylaw	Board of Selectmen	Convene public meeting to discuss local storm water effort and the proposed bylaw.	The Hollis Storm Water Committee met four times during permit year 3. The status of the storm water regulations was discussed at each of these meetings.	Convene public meeting with the Board of Selectmen and representatives of the Hollis land use review committees to discuss the proposed regulations.
Revised					
Revised					
Revised					
Revised					
Revised					

6. Pollution Prevention and Good Housekeeping in Municipal Operations

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
2.1.A	Continue catch basin cleaning program in permit coverage area.	Department of Public Works	Continue routine inspection and cleaning program of catch basins located in permit area.	DPW sponsored a routine inspection and maintenance program for the drainage structures located in the permit area.	Continue routine maintenance program and expand maintenance efforts to include the entire town.
Revised					
2.1.B	Continue street sweeping program in the permit coverage area.	Department of Public Works	Continue street sweeping program in the permit area.	Conduct annual street sweeping program.	Continue municipal street sweeping program.
Revised					
2.1.C	Develop informational packets to be distributed to neighborhoods for adoption of storm water structure	Board of Selectmen	Produce packet for delivery to town residents	New Resident packet completed. The town is continuing to distribute this information.	Continue and expand local educational efforts to promote the adoption of local storm water structures.
Revised					
2.1.D	Begin inspecting and cataloging of storm water structures located in the permit coverage area	Department of Public Works	Survey and document drainage structures located in permit area.	Students from UNH have prepared a GPS survey of the drainage structures and outfalls located in the permit area. Municipal staff maintained and expanded this database as new drainage structures were constructed or identified.	All future drainage structures constructed in the permit area will be added to this database. Municipal staff will continue to maintain and expand this database.
Revised					
Revised					

7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA) *<<if applicable>>*

BMP ID #	BMP Description	Responsible Dept./Person Name	Measurable Goal(s)	Progress on Goal(s) – Permit Year 3 (Reliance on non-municipal partners indicated, if any)	Planned Activities – Permit Year 4
Revised					
Revised					
Revised					
Revised					
Revised					
Revised					

7a. Additions

7b. WLA Assessment

Part IV. Summary of Information Collected and Analyzed

- Hollis continues to participate in a regional storm water roundtable sponsored by the Nashua Regional Planning Commission. This group has been working on collecting and developing educational materials to raise awareness among the local population. This group has discussed collaborating on the development of a storm water educational curriculum for use in local schools.
- The Hollis Storm Water Committee has reviewed the water quality databases maintained by the New Hampshire Department of Environmental Services and the U.S. Environmental Protection Agency. During this review, we determined that there are no prime wetlands present in Hollis as defined by the DES. Five local waterbodies appear on the 303(d) list of impaired waterbodies prepared by DES. The impaired waterbodies include: the Nashua River, Flint Pond, Silver Lake, Muddy and Pennichuck Brooks. The committee hopes to use the information to develop outreach materials to better inform local residents how their actions can influence local water quality while also describing preventive measures that can be initiated.
- Site modifications have been implemented at the Hollis Stump Dump and Transfer Station to enhance materials management and improve the treatment of storm water at each of these sites.
- A holding tank has been installed at the Hollis Police station to collect industrial waste water generated during the washing of police vehicles. In addition, the storm drainage system has been re-constructed to provide enhanced pollutant attenuation.
- A holding tank has been installed at the Hollis Fire station to collect industrial waste water generated during the washing of bunker gear. In addition the storm drainage system has been re-constructed to provide enhanced pollutant attenuation.
- A new salt barn has been constructed at the Hollis Highway Garage. This structure will reduce the amount of salt entering the environment at this location. The Town of Hollis has also developed a comprehensive concept plan to expand and re-configure the Highway Garage facility. The modified design incorporates a variety of pollution prevention techniques.
- Additional information, agendas and Public Meeting Minutes can be supplied upon request.

Part V. Program Outputs & Accomplishments (OPTIONAL)

Programmatic

Storm water management position created/staffed	No Position Created	
Annual program budget/expenditures	Approx $35,000 Consulting Fees	

Education, Involvement, and Training

Estimated number of residents reached by education program(s)	10%	
Storm water management committee established	Committee Established	
Stream teams established or supported	Committee Existed	
Shoreline clean-up participation or quantity of shoreline miles cleaned	None	
Household Hazardous Waste Collection Days	5 days scheduled this permit year	
▪ days sponsored	5 days	
▪ community participation	unknown	
▪ material collected waste oil, antifreeze, car batteries.	All year	
School curricula implemented	No	

Legal/Regulatory

In Place

	Prior to Phase II	Under Review	Drafted	Adopted
Regulatory Mechanism Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control	X	X	X	
▪ Post-Development Storm water Management		X	X	
Accompanying Regulation Status (indicate with "X")				
▪ Illicit Discharge Detection & Elimination		X		
▪ Erosion & Sediment Control	X	X		
▪ Post-Development Storm water Management		X		

Mapping and Illicit Discharges

Outfall mapping complete	40%	
Estimated or actual number of outfalls	1	
System-Wide mapping complete	40%	
Mapping method(s)		
▪ Paper/Mylar	75%	
▪ CADD	10%	
▪ GIS	50%	
Outfalls inspected/screened	0	
Illicit discharges identified	0	
Illicit connections removed	N/A	
% of population on sewer – Hollis is a town of well water and septic systems	(0%)	
% of population on septic systems	(100%)	

Construction

Number of construction starts (>1-acre)	4	
Estimated percentage of construction starts adequately regulated for erosion and sediment control	75%	
Site inspections completed	75%	

Vacuum street sweepers purchased/leased	NONE	
Vacuum street sweepers specified in contracts	1 sweeper; 1 dump truck contracted	

Reduction in application on public land of: ("N/A" = never used; "100%" = elimination)		
▪ Fertilizers	N/A	
▪ Herbicides	N/A	
▪ Pesticides	N/A	

Anti-/De-Icing products and ratios	% NaCl % $CaCl_2$ % $MgCl_2$ % CMA % Kac % KCl % Sand	
Pre-wetting techniques utilized	NO	
Manual control spreaders used	NO	
Automatic or Zero-velocity spreaders used	YES	
Estimated net reduction in typical year salt application	N/A	
Salt pile(s) covered in storage shed(s) – New salt shed for 2005-2006	YES	
Storage shed(s) in design or under construction	IN DESIGN	