

MEMORANDUM

TO: Carter Terenzini, Town Administrator

FROM: Stefan Bengtson, MS, MESM; William Guenther, MS

DATE: February 20, 2020

RE: Town of Templeton MS4 Program Support - Outfall/Catchment Priority Ranking

This memo summarizes the methods and results of the Town of Templeton's stormwater outfall inventory and priority ranking. This work supports the Town's compliance with Section 2.3.4.7.a.iii of the 2016 Massachusetts Small MS4 General Permit ("the permit"), which requires such assessment as part of a defined illicit discharge detection and elimination (IDDE) program.

Ranking Process

The permit requires all outfall catchments within the Town's regulated area be ranked into one of four distinct categories (Table 1). These initial rankings must reflect screening factors that indicate illicit discharge potential or where potential illicit discharges could impair a waterbody's designated use. The permit lists nine screening factors to be used in the ranking process and allows for the consideration of other local conditions, as applicable. The rankings should be used to prioritize dry-weather screening of all regulated outfalls.

Based on these dry-weather screenings, the permit requires the initial rankings to be updated with new information to re-prioritize catchment investigations. Outfall catchments with higher priority have an accelerated investigation schedule that requires them to be screened ahead of lower priority catchments. Catchments with known or suspected contributions of illicit discharges based on existing information or previously collected data must be placed at the top of the priority list, based on criteria defined in the permit. Rankings of other outfalls may be modified at the Town's discretion.

Table 1: Catchment rank definitions in the 2016 MS4 permit

Rank	Permit Description
Problem	Outfalls/interconnections with known or suspected contributions of illicit discharges based on
	existing information shall be designated as Problem Outfalls. This shall include any
	outfalls/interconnections where previous screening indicates likely sewer input
High	Outfalls/interconnections that have not been classified as Problem Outfalls and that are:
	 discharging to an area of concern to public health due to proximity of public beaches, recreational areas, drinking water supplies or shellfish beds;
	 determined by the permittee as high priority based on the characteristics listed below or other available information
Low	Outfalls/interconnections determined by the permittee as low priority based on the characteristics
	listed below or other available information



Mr. Carter Terenzini February 20, 2020 Page 2 of 7

Rank	Permit Description								
Excluded	Outfalls/interconnections with no potential for illicit discharges may be excluded from the IDDE								
	program. This category is limited to roadway drainage in undeveloped areas with no dwellings and								
	no sanitary sewers; drainage for athletic fields, parks or undeveloped green space and associated								
	parking without services; cross-country drainage alignments (that neither cross nor are in								
	proximity to sanitary sewer alignments) through undeveloped land								

Ranking Factors

The MS4 permit requires the following factors be considered when developing the initial catchment priority rankings. Where these factors are present in a catchment, they indicate an increased likelihood that an illicit discharge will be detected.

1. Past Discharge Screening Reports and Complaints

Past outfall screening results conducted by EarthTech in 2006 or 2007 were available and incorporated into the ranking matrix. We assigned each outfall a likelihood of containing an illicit discharge based on the available evidence. Dry-weather flow with the presence of stains, sheens, and/or floatables were noted at six outfalls. Given the time since inspection, however, along with the quality of available photographic evidence, we are unable to support the conclusion that any of the outfalls where visual evidence was noted, in addition to dry-weather flow, rise to the level of Problem Outfall. Those outfalls where EarthTech inferred visual evidence of illicit discharge were given the highest score for this factor and automatically given High Priority, irrespective of other factors.

2. Receiving Water Quality

This category is an amalgamation of the permit factors 'poor receiving water quality' and 'water quality limited water bodies'. Including both would double count these outfalls. Factor scores were based on the 2016 Massachusetts Integrated List of Waters. Four ponds in Templeton, including two in the Regulated Area (Depot Pond, MA32018; Greenwood Pond MA32026) are subject to the Millers Basin Lakes Phosphorus TMDL. The 2016 List changed the status for these two ponds from "TMDL Developed" to "Non-Pollutant Impairment". Outfalls directly discharging to these two TMDL ponds were given higher scores than those directly discharging to waters listed as unassessed.

It is worth noting that the 2016 Integrated List of Waters removed or altered many impairment designations for waterbodies in Templeton's MS4 Regulated Area (Table 2), that may substantially reduce the level of effort required to comply with the permit. Specifically, the segment of the Otter River from the Gardner Wastewater Treatment Plant to the Seaman Paper Company had its bacteria and nutrient impairments delisted. The segment from Seaman Paper Company to the confluence with Millers River had all impairments except for PCBs in Fish Tissue delisted. The given reason for delisting included changes in water quality standards or an unspecified reason for water quality improvement. PCB in Fish Tissue does not require any special treatment during IDDE investigations, per Appendix G of the permit.



Mr. Carter Terenzini February 20, 2020 Page 3 of 7

Based on this new information, Fuss & O'Neill interprets the language in Appendix H.II.2 of the permit to relieve the Town of Templeton from requirements of Appendix H.II, until such time as a subsequent Integrated List of Waters may change the impairments or the pollutants impairing the Otter River.

The impairments to the four TMDL ponds were also modified in the 2016 Integrated List of Waters, from TMDL Developed (4A) to Non-Pollutant Impairment (4C). This change indicates the impairment in the Ponds is not caused by phosphorus (a pollutant), and because the change was approved by EPA, should result in reduced regulatory requirements of the Town. The MS4 Permit specifies, however, that the Town is not relieved of its additional requirements relating to TMDL-impaired waterbodies, until:

"[t]he applicable TMDL has been modified, revised or withdrawn and EPA has approved a new TMDL applicable for the receiving water that indicates that no additional stormwater controls for the control of phosphorus are necessary for the permittee's discharge based on wasteload allocations in the newly approved TMDL".

Based on this new information and the permit language above, we recommend that the Town continues to comply with the requirements specified in Appendix F.II of the permit, until such time as a new TMDL is approved.

Table 2: Changes to Waterbody Impairment Status in Templeton as indicated in the 2016 Integrated List of Waters

	Cate	gory								
	2014	2016	Impairment	Explanation						
Otter River	5 2		Benthic Macroinverts	Applicable WQS attained; reason for recovery unspecified						
(MA35-07)			Fish Bioassessments	Applicable WQS attained; reason for recovery unspecified						
			Nutrient/Eutrophication	Applicable WQS attained; reason for recovery unspecified						
			Turbidity	Applicable WQS attained; reason for recovery unspecified						
Otter River	5	5	TDS	Applicable WQS attained; reason for recovery unspecified						
(MA35-08)			Benthic Macroinverts	Applicable WQS attained; reason for recovery unspecified						
			Fecal coliform	Applicable WQS attained; due to change in WQS						
			Fish Bioassessments	Applicable WQS attained; reason for recovery unspecified						
			Nutrient/Eutrophication	Applicable WQS attained; reason for recovery unspecified						
			PCBs in Fish Tissue	No listing change. Appendix G: No monitoring required						
			Taste and Odor	Applicable WQS attained; reason for recovery unspecified						
			Turbidity	Applicable WQS attained; reason for recovery unspecified						
Depot Pond	4A	4C	Aquatic Plants	Not caused by a pollutant, impairment still exists						
(MA35018)			(macrophytes)							
Greenwood Pond	4A	4C	Aquatic Plants	Not caused by a pollutant, impairment still exists						
(MA35026)			(macrophytes)							

3. <u>Density of Generating Sites/Land Use</u>

Density of Generating Sites was quantitatively estimated for each catchment using available land use data. This estimate was supplemented by a qualitative analysis of aerial imagery, and Google



Mr. Carter Terenzini February 20, 2020 Page 4 of 7

maps/streetview to identify potential locations of generating sites listed in the permit. Templeton has variable levels of land use development intensity within its regulated area, ranging from undeveloped woodland and low density residential to industrial facilities. Fuss & O'Neill therefore assigned land uses an illicit discharge risk, based on factors specified in the permit, and calculated the percent of each catchment within each risk category. Catchments were assigned to a risk category based on the majority land use risk within each catchment.

To account for limitations associated with this automated method, the catchments were then reviewed against aerial imagery and Google maps/streetview to verify the category assignments and changed manually where appropriate. For example, the dominant land use to outfall catchment ID 81 was calculated as low-risk, comprised mainly of single family residential, and would have been listed as medium risk. The Seaman Paper Company, an older industrial site, is 9% of the catchment and adjacent to the Otter River and Outfall ID 81. Based on the proximity of that "generating site", the catchment was manually changed to high density.

4. Age of Development and Infrastructure

Development age was determined from the Massachusetts Level 3 parcels database, which included a Year Built attribute. Based on this Year Built attribute, developed parcels within each catchment were sorted into one of three categories: 1990s to present, 1970 to 1990, and pre-1970. An area-weighted average year built was calculated for each catchment. Catchments were manually assigned to a category based on this weighted average value, with additional weight placed on pre-1970 parcels. Many of Templeton's roads likely date from this time, because parcels on these roads would not have been built without roads. Any infill development (which would advance the average year built) would have occurred on roads that predate that later construction. Accordingly, only subdivisions with a relatively narrow range of construction dates fell into the later categories. Catchments that fell into the "pre-1970" category were given the highest score.

5. <u>Density of Aging Septic Systems</u>

The entirety of the regulated area was assumed to be serviced by sanitary sewer. As a result, this factor was excluded from the ranking exercise.

6. Sewer Conversion

No sanitary sewer coverage was available for review from the Town, but two treatment plants were identified within the regulated area via aerial imagery. It was therefore assumed that the entire regulated area was serviced by sanitary sewers. Because this assumption resulted in a uniform score across catchments, it effectively did not impact the overall ranking. The Town may wish to update sewer coverage mapping prior to assessing individual catchments for System Vulnerability Factors, a step of an IDDE investigation required by the permit.

7. Public Health Area of Concern



Mr. Carter Terenzini February 20, 2020 Page 5 of 7

Illicit discharges to outfalls discharging to bathing beaches, recreational facilities, drinking water supplies, or shellfish beds could have an outsized effect on public health. The MS4 permit requires those outfall catchments to be given a High Priority rank. In the Town of Templeton, no public or private bathing beaches receive stormwater discharges from a regulated outfall. The wellhead protection area for one community groundwater source (Otter River GPW) was identified through MassGIS data. The six outfall catchments overlapping with the wellhead protection area were designated as a public health concern area. These outfall catchments were given the highest score for Public Health Area and automatically ranked as High Priority, irrespective of other factors, as required by the MS4 permit.

8. Culverted Streams

Culverted streams did not apply in Templeton, as there are no rivers or streams that are culverted for more than a simple roadway crossing, therefore this factor was removed from the ranking matrix.

9. Historic Combined Sewer Systems

Combined sewers did not apply in Templeton, therefore this screening factor was removed from the matrix.

Scoring ranking factors

To facilitate ranking of catchments into priority categories, Fuss & O'Neill developed a ranking matrix where scores were assigned to reflect catchment-specific information. Further detail on the assignment of scores is available in Table 3. Assigned scores were summed and then scaled to fall between 0 and 10, where a score of zero indicates the lowest relative likelihood of the presence of illicit discharge. Rankings were assigned manually and reflect the assigned scores, as well as drainage to impaired waters, specifically those in Table 2.



Mr. Carter Terenzini February 20, 2020 Page 6 of 7

Table 3: Outfall catchment screening factors required for consideration by the 2016 MS4 permit

Ranking Factor	Permit Description	Scoring Method	Data source
Past discharge	Results of past IDDE outfall screening	Screened, No flow: 0	Town of Templeton
screening reports	conducted by Town and Reports to Town	Unscreened: 1	
and/or complaints	of odors or discharge from outfalls.	Flow, no IDDE evidence: 2	
		IDDE evidence: 3	
Receiving Water	Water quality limited waterbodies that	Receiving Water Quality	MassDEP Integrated
Quality	receive a discharge from the MS4 or waters	Unassessed: 0	List of Waters 2016
	with approved TMDLs applicable to the	Non-TMDL impairment (e.g.	TMDL for Nutrients in
	permittee, where illicit discharges have the	non-native plants): 1	the Millers Basin Lakes
	potential to contain the pollutant identified	Impaired: 2	
	as the cause of the water quality impairment	TMDL: 3	
Land Use /	Generating sites are those places, including	Generator Density	MassGIS Land Use
Generator Density	institutional, municipal, commercial, or	Excluded: -3	(2016), Aerial imagery;
	industrial sites, with a potential to generate	Low: 1	Google Maps and
	pollutants that could contribute to illicit	Medium: 2	Streetview
	discharges.	High: 3	
Development Age	Industrial areas greater than 40 years old and	Development age:	MassGIS Level 3 Parcel
	areas where the sanitary sewer system is	1990 - present: 1	Data
	more than 40 years old will probably have a	1970 – 1990: 2	
	high illicit discharge potential.	Pre-1970: 3	
	Developments 20 years or younger will		
	probably have a low illicit discharge		
	potential		
Septic Age	Septic systems thirty years or older in	Septic age:	Not applicable to
	residential land use areas are prone to have	< 20 years: 0	Templeton
	failures and may have a high illicit discharge	20-40 years: 1	
	potential	40+ years: 3	
		Sewered: 0	
Public Health Area	Outfall discharges to waterbody containing	Public Health Area	MassGIS
	a public bathing area or drinking water	No: 0	
	source	Yes: 3	
Sewer Conversion	Contributing catchment areas that were	Sewer Conversion	Town of Templeton
	once serviced by septic systems, but have	No: 0	
	been converted to sewer connections may	Yes: 3	
	have a high illicit discharge potential		
Culverted Stream	Any river or stream that is culverted for	Stream Crossings	Not applicable to
	distances greater than a simple roadway	Road crossings only: 0	Templeton
	crossing may have a high illicit discharge	Limited Potential: 1	
	potential	High Potential: 3	
Historic combined	Contributing areas that were once serviced	Past CSO separation	Not applicable to
sewer systems	by a combined sewer system, but have been	No: 0	Templeton
	separated may have a high illicit discharge	Yes: 3	
	potential		



Mr. Carter Terenzini February 20, 2020 Page 7 of 7

Results

In the Town of Templeton, Development Age, Land Use, Receiving Water Quality, and Past IDDE Screening Results emerged as the primary drivers of IDDE potential and therefore of priority ranking. Most screening factors were uniform and varied little across the MS4-regulated area. As previously mentioned, several required ranking factors did not apply in Templeton's regulated area.

Seventy-five (75) town-owned outfalls are located in Templeton's regulated area according to the Town's outfall mapping and were included in the outfall ranking. Of these 75 ranked catchments, 29 were ranked as High Priority catchments (Attachment A). Many of these 29 outfalls are in public health areas or have older infrastructure. The high priority outfall catchments are also characterized by older residential and industrial/commercial areas. The remaining 46 catchments were designated Low Priority. These mostly residential catchments fall under this category due in part to more recent construction or discharge to unimpaired tributaries or waterbodies without TMDLs. No Problem catchments or Excluded catchments were identified.

Attachment 1 Initial Outfall Catchment Ranking

Outfall ID	Past Discharge Reports	Receiving Water Quality	Density of Generating Sites	Age of Development and Infrastructure	Past Sewer Conversion	Historic CSOs	Septic Age	Culverted Streams	Public Health Area	Illicit Connection TMDL	Score (0-10)	Priority
26	Flow, no IDDE evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	Yes	No	10.0	High
58	Screened, No IDDE Evidence	NonTMDL	High	Pre-1970	Yes	No	Sewered	No	Yes	No	10.0	High
81	Screened, No IDDE Evidence	NonTMDL	High	Pre-1970	Yes	No	Sewered	No	Yes	No	10.0	High
57	Flow, no IDDE evidence	NonTMDL	High	Pre-1970	Yes	No	Sewered	No	No	No	8.8	High
24	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	Yes	No	7.5	High
82	Unscreened	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	Yes	No	7.5	High
37	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	6.3	High
39	Unscreened	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	6.3	High
41	Screened, No IDDE Evidence	NonTMDL	Low	1970-1990	Yes	No	Sewered	No	No	No	6.3	High
44	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	6.3	High
45	Screened, No IDDE Evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	6.3	High
52	Flow, no IDDE evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	6.3	High
149	Unscreened	Good or unassessed	High	Pre-1970	Yes	No	Sewered	No	No	No	6.3	High
25	Unscreened	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	5.0	Low
29	Flow, no IDDE evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	5.0	Low
36	Unscreened	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	Yes	No	5.0	High
49	Unscreened	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	5.0	Low
109	Flow, no IDDE evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	5.0	High
118	Unscreened	Good or unassessed	High	1970-1990	Yes	No	Sewered	No	No	No	5.0	Low
148	Screened, No IDDE Evidence	Good or unassessed	High	Pre-1970	Yes	No	Sewered	No	No	No	5.0	Low
156	Flow, no IDDE evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	5.0	Low
22	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
27	Unscreened	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
28	Flow, no IDDE evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	3.8	Low
35	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	Yes	No	3.8	High
53	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
55	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
56	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
61	Flow, no IDDE evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	3.8	Low
62	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
75	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
77	Unscreened	NonTMDL	Low	1970-1990	Yes	No	Sewered	No	No	No	3.8	Low
78	Unscreened	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
79	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
80	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
99	Flow, no IDDE evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	3.8	Low
154	Unscreened	Good or unassessed	High	Post-1990	Yes	No	Sewered	No	No	No	3.8	Low
287	Screened, No IDDE Evidence	NonTMDL	Low	Pre-1970	Yes	No	Sewered	No	No	No	3.8	Low
331	Flow, no IDDE evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	3.8	High
30	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
68	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
71	Unscreened	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	2.5	Low
72	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
76	Screened, No IDDE Evidence	NonTMDL	Low	1970-1990	Yes	No	Sewered	No	No	No	2.5	Low
83	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
89	Unscreened	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	2.5	Low
90	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
92	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low

Attachment 1 Initial Outfall Catchment Ranking

Outfall ID	Past Discharge Reports	Receiving Water Quality	Density of Generating Sites	Age of Development and Infrastructure	Past Sewer Conversion	Historic CSOs	Septic Age	Culverted Streams	Public Health Area	Illicit Connection TMDL	Score (0-10)	Priority
100	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
111	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
120	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
132	Unscreened	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	2.5	Low
157	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
158	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
160	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
161	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
162	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
164	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
166	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
185	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
328	Screened, No IDDE Evidence	Good or unassessed	Low	Pre-1970	Yes	No	Sewered	No	No	No	2.5	Low
330	Flow, no IDDE evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	2.5	High
332	Unscreened	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	2.5	High
333	Flow, no IDDE evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	2.5	Low
334	Flow, no IDDE evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	2.5	High
423	Screened, No IDDE Evidence	NonTMDL	Low	1970-1990	Yes	No	Sewered	No	No	No	2.5	Low
66	Flow, no IDDE evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	2.5	High
50	Screened, No IDDE Evidence	NonTMDL	Low	Post-1990	Yes	No	Sewered	No	No	No	1.3	Low
60	Unscreened	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	1.3	Low
95	Screened, No IDDE Evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	1.3	Low
151	Screened, No IDDE Evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	1.3	Low
163	Screened, No IDDE Evidence	Good or unassessed	Low	1970-1990	Yes	No	Sewered	No	No	No	1.3	Low
47	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
64	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
67	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
85	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
94	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
131	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
167	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low
329	Screened, No IDDE Evidence	Good or unassessed	Low	Post-1990	Yes	No	Sewered	No	No	No	0.0	Low