



1 Overocker Road
Poughkeepsie, NY 12603

Town of Poughkeepsie

Planning & Zoning

845-485-3657 Phone
845-486-7885/790-4772 Fax

TOWN OF POUGHKEEPSIE

STORMWATER MANAGEMENT PROGRAM

2011-2012 ANNUAL REPORT

SPDES PERMIT NUMBER: NYR20A198

Prepared for:
Town of Poughkeepsie Town Board



FINAL REPORT
Dated May 25, 2012

MS4 Annual Report Cover Page

MCC form for period ending March 9,

Provide SPDES ID of each permitted MS4 included in this report.

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MS4 Municipal Compliance Certification(MCC) Form

MCC form for period ending March 9, 2 0 1 2

Name of MS4 TOWN OF POUGHKEEPSIE

SPDES ID

N Y R 2 0 A 1 9 8

Section 4 - Certification Statement

"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, 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."

This form must be signed by either a principal executive officer or ranking elected official, or duly authorized representative of that person as described in GP-0-08-002 Part VI.J.

First Name T O D D MI N Last Name T A N C R E D I

Title (Clearly print title of individual signing report) S U P E R V I S O R

Signature 

Date 0 5 / 2 5 / 2 0 1 2

Send completed form and any attachments to the DEC Central Office at:

MS4 Permit Coordinator
Division of Water
4th Floor
625 Broadway
Albany, New York 12233-3505

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

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SPDES ID

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3. What strategies did your MS4/Coalition use to achieve education and outreach goals during this reporting period? Check all that apply:

- | | | | | | | | |
|--|---------------------|--|---|---|---|---|---|
| <input checked="" type="radio"/> Construction Site Operators Trained | # Trained | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td>2</td><td>7</td><td>1</td></tr></table> | | | 2 | 7 | 1 |
| | | 2 | 7 | 1 | | | |
| <input checked="" type="radio"/> Direct Mailings | # Mailings | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td> </td><td>3</td><td>4</td></tr></table> | | | | 3 | 4 |
| | | | 3 | 4 | | | |
| <input checked="" type="radio"/> Kiosks or Other Displays | # Locations | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td> </td><td> </td><td>6</td></tr></table> | | | | | 6 |
| | | | | 6 | | | |
| <input checked="" type="radio"/> List-Serves | # In List | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td>1</td><td>6</td><td>7</td></tr></table> | | | 1 | 6 | 7 |
| | | 1 | 6 | 7 | | | |
| <input checked="" type="radio"/> Mailing List | # In List | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td>7</td><td>0</td><td>1</td></tr></table> | | | 7 | 0 | 1 |
| | | 7 | 0 | 1 | | | |
| <input checked="" type="radio"/> Newspaper Ads or Articles | # Days Run | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td> </td><td> </td><td>6</td></tr></table> | | | | | 6 |
| | | | | 6 | | | |
| <input checked="" type="radio"/> Public Events/Presentations | # Attendees | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td>4</td><td>6</td><td>7</td></tr></table> | | | 4 | 6 | 7 |
| | | 4 | 6 | 7 | | | |
| <input type="radio"/> School Program | # Attendees | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr></table> | | | | | |
| | | | | | | | |
| <input type="radio"/> TV Spot/Program | # Days Run | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr></table> | | | | | |
| | | | | | | | |
| <input checked="" type="radio"/> Printed Materials: | Total # Distributed | <table border="1" style="display: inline-table;"><tr><td> </td><td> </td><td>5</td><td>1</td><td>1</td></tr></table> | | | 5 | 1 | 1 |
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Locations (e.g. libraries, town offices, kiosks)

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D	U	T	C	H	E	S	S		C	O		F	A	I	R				

Other:

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Web Page: Provide specific web addresses - not home page. Continue on next page if additional space is needed.

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MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

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3. Web Page con't.: Provide specific web addresses - not home page.

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MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

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4. Evaluating Progress Toward Measurable Goals MCM 1

Use this page to report on your progress and project plans toward achieving measurable goals identified in your Stormwater Management Program Plan (SWMPP), including requirements in Part III.C.1. Submit additional pages as needed.

A. Briefly summarize the Measurable Goal identified in the SWMPP in this reporting period.

- MS4 education and training of developers, consultants, contractor, professionals and department employees on erosion control, BMP's and pollution prevention and IDDE
- Distribution of brochures to target audience and stakeholders
- Maintain Town website for public awareness

B. Briefly summarize the observations that indicated the overall effectiveness of this Measurable Goal.

- Pollution prevention and IDDE training (1)
- Brochures distributed to all commercial users of the Town's POTW on procedures on preventing stormwater pollution. Stormwater/event notices (32) to stakeholders
- Website contains access to annual stormwater reports, informative educational publications and additional links to organizations and events (9)

C. How many times was this observation measured or evaluated in this reporting period?

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(ex.: samples/participants/events)

D. Has your MS4 made progress toward this Measurable Goal during this reporting period?
 Yes No
E. Is your MS4 on schedule to meet the deadline set forth in the SWMPP?
 Yes No
F. Briefly summarize the stormwater activities planned to meet the goals of this MCM during the next reporting cycle (including an implementation schedule).

- Brochure distribution to residents and commercial owners within the Town during the MS4 outfall inspections
- Continued involvement with the Dutchess County MS4 Committee on billboards, educational functions and brochure development
- Maintain use of list-serve, stormwater webpage & trainings for education/outreach

-Ensure that the 2011-2012 SWMPP is available for public review on the Town's website

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

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4.a. If this report was made available on the internet, what date was it posted?

Leave blank if this report was not posted on the internet.

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4.b. For how many days was/will this report be posted?

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If submitting a report for single MS4, answer 5.a.. If submitting a joint report, answer 5.b..

5.a. Was an Annual Report public meeting held in this reporting period?

Yes No

If Yes, what was the date of the meeting?

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If No, is one planned?

***Meeting was for last year's report**

Yes No

5.b. Was an Annual Report public meeting held for all MS4s contributing to this report during this reporting period?

Yes No

If No, is one planned for each?

Yes No

N/A

6. Were comments received during this reporting period?

Yes No

If Yes, attach comments, responses and changes made to SWMP in response to comments to this report.

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

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7. Evaluating Progress Toward Measurable Goals MCM 2

Use this page to report on your progress and project plans toward achieving measurable goals identified in your Stormwater Management Program Plan (SWMPP), including requirements in Part III.C.1. Submit additional pages as needed.

A. Briefly summarize the Measurable Goal identified in the SWMPP in this reporting period.

-Maintain use of Town website and list serve for distribution of notices and educational information.
 -Continue to participate in public events via Watershed Awareness Month and Cornell University Cooperative Extension of Dutchess County, and local watershed associations.

B. Briefly summarize the observations that indicated the overall effectiveness of this Measurable Goal.

-Approximately 244 persons attended 10 WAM public outreach events.
 -Approximately 426 persons attended the (33) stakeholder meetings.
 -Electronic and direct stormwater info mailings (34)
 -Public hearing on Annual report held on 5/18/2011
 -Outreach links expanded on Town's website

C. How many times was this observation measured or evaluated in this reporting period?

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(ex.: samples/participants/events)

D. Has your MS4 made progress toward this measurable goal during this reporting period?

Yes No

E. Is your MS4 on schedule to meet the deadline set forth in the SWMPP?

Yes No

F. Briefly summarize the stormwater activities planned to meet the goals of this MCM during the next reporting cycle (including an implementation schedule).

-Continue to support Dutchess WAM , MS4 committee and other watershed groups in the community.
 -Continue to enhance content and accessibility of the Town's stormwater page.
 -Continue electronic and direct stormwater informational mailings.

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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TOWN OF POUGHKEEPSIE

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12. Evaluating Progress Toward Measurable Goals MCM 3

Use this page to report on your progress and project plans toward achieving measurable goals identified in your Stormwater Management Program Plan (SWMPP), including requirements in Part III.C.1. Submit additional pages as needed.

A. Briefly summarize the Measurable Goal identified in the SWMPP in this reporting period.

- Conduct a minimum of 20% of outfall inspections in dry weather conditions
- Continue to update outfall mapping
- Establish a public hotline for illicit discharge reporting
- Continue to attend IDDE training events for department and municipal staff

B. Briefly summarize the observations that indicated the overall effectiveness of this Measurable Goal.

- The Town Engineering department conducted 140 inspections (23%) this last reporting period; outfalls were photographed and conditions documented and locations updated. Outfalls needing attention were reported to the Town Highway Department
- A hotline has been established
- Approximately 22 department and municipal staff was trained in IDDE

C. How many times was this observation measured or evaluated in this reporting period?

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*(ex.: samples/participants/events)***D. Has your MS4 made progress toward this measurable goal during this reporting period?**

Yes No

E. Is your MS4 on schedule to meet the deadline set forth in the SWMPP?

Yes No

F. Briefly summarize the stormwater activities planned to meet the goals of this MCM during the next reporting cycle (including an implementation schedule).

- Inspector will continue to update MS4 records
- Departments will continue to record IDDE occurrences and maintenance actions
- Trainings will continue for department staff for IDDE and Pollution Prevention

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

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Name of MS4/Coalition

TOWN OF POUGHKEEPSIE									
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Minimum Control Measures 4 and 5.
Construction Site and Post-Construction Control

The information in this section is being reported (check one):

- On behalf of an individual MS4
- On behalf of a coalition

How many MS4s contributed to this report?

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1a. Has each MS4 contributing to this report adopted a law, ordinance or other regulatory mechanism that provides equivalent protection to the NYS SPDES General Permit for Stormwater Discharges from Construction Activities? Yes No

1b. Has each Town, City and/or Village contributing to this report documented that the law is equivalent to a NYSDEC Sample Local Law for Stormwater Management and Erosion and Sediment Control through either an attorney certification or using the NYSDEC Gap Analysis Workbook? Yes No NT

If Yes, Towns, Cities and Villages provide date of equivalent NYS Sample Local Law. 09/2004 03/2006 NT

2. Does your MS4/Coalition have a SWPPP review procedure in place? Yes No

3. How many Construction Stormwater Pollution Prevention Plans (SWPPPs) have been reviewed in this reporting period?

	1	2
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4. Does your MS4/Coalition have a mechanism for receipt and consideration of public comments related to construction SWPPPs? Yes No NT

If Yes, how many public comments were received during this reporting period?

	2	5
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5. Does your MS4/Coalition provide education and training for contractors about the local SWPPP process? Yes No

* Comments are generally received during the public hearings, complaints during construction and are verbal rather than written; therefore total is an estimate

6. Identify which of the following types of enforcement actions you used during the reporting period for construction activities, indicate the number of actions, or note those for which you do not have authority:

- Notices of Violation #

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 No Authority
- Stop Work Orders #

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 No Authority
- Criminal Actions #

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 No Authority
- Termination of Contracts #

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 No Authority
- Administrative Fines #

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 No Authority
- Civil Penalties #

--	--	--	--	--

 No Authority
- Administrative Orders #

--	--	--	--	--

 No Authority
- Enforcement Actions or Sanctions #

--	--	--	--	--
- Other #

			2	0
--	--	--	---	---

 No Authority

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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Minimum Control Measure 4. Construction Site Stormwater Runoff Control

The information in this section is being reported (check one):

- On behalf of an individual MS4
 On behalf of a coalition

How many MS4s contributed to this report?

--	--	--

1. How many construction projects have been authorized for disturbances of one acre or more during this reporting period?

		3
--	--	---

2. How many construction projects disturbing at least one acre were active in your jurisdiction during this reporting period?

	1	2
--	---	---

3. What percent of active construction sites were inspected during this reporting period? NT

1	0	0
---	---	---

 %

4. What percent of active construction sites were inspected more than once? NT

1	0	0
---	---	---

 %

5. Do all inspectors working on behalf of the MS4s contributing to this report use the NYS Construction Stormwater Inspection Manual? Yes No NT

6. Does your MS4/Coalition provide public access to Stormwater Pollution Prevention Plans (SWPPPs) of construction projects that are subject to MS4 review and approval? Yes No NT

If your MS4 is Non-Traditional, are SWPPPs of construction projects made available for public review? Yes No

If Yes, use the following page to identify location(s) where SWPPPs can be accessed.

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9, 2012

If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition TOWN OF POUGHKEEPSIE

SPDES ID
N Y R 2 0 A 1 9 8

6. con't.:

Submit additional pages as needed.

● MS4/Coalition Office

Department

T O W N P L A N N I N G D E P A R T M E N T

Address

O N E O V E R O C K E R R D

City

P O U G H K E E P S I E

N Y

Zip

1 2 6 0 3 -

Phone

(8 4 5) 4 8 5 - 3 6 5 7

○ Library

Address

City

Zip

-

Phone

() -

○ Other

Address

City

Zip

-

Phone

() -

○ Web Page URL(s): Please provide specific address where SWPPPs can be accessed - not home page.

URL

URL

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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7. Evaluating Progress Toward Measurable Goals MCM 4

Use this page to report on your progress and project plans toward achieving measurable goals identified in your Stormwater Management Program Plan (SWMPP), including requirements in Part III.C.1. Submit additional pages as needed.

A. Briefly summarize the Measurable Goal identified in the SWMPP in this reporting period.

- Track number of employees that have had training
- Continue to inspect construction sites disturbing one acre or greater
- Continue to update MS4 inventory of active construction sites.
- Institute required monthly site conditions certifications by applicant's licensed professional.

B. Briefly summarize the observations that indicated the overall effectiveness of this Measurable Goal.

- 209 contractors were trained for certifications through Dutchess County Soil and Water
- 100% of active construction sites were inspected for compliance by the Town; notices or violations were enforced as needed.
- Ms4 inventory of active construction sites are completed.
- Monthly site conditions certifications by applicant's licensed professional have been obtained.

C. How many times was this observation measured or evaluated in this reporting period?

		2	4
--	--	---	---

(ex.: samples/participants/events)

D. Has your MS4 made progress toward this measurable goal during this reporting period?
 Yes No
E. Is your MS4 on schedule to meet the deadline set forth in the SWMPP?
 Yes No
F. Briefly summarize the stormwater activities planned to meet the goals of this MCM during the next reporting cycle (including an implementation schedule).

- Continue to train and document the certification of contractors/staff throughout the year.
- Continue to inspect and enforce erosion control measures

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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4a. Are the MS4s contributing to this report involved in a regional/watershed wide planning effort?

Yes No

4b. Does the MS4 have a banking and credit system for stormwater management practices?

Yes No

4c. Do the SWMP Plans for each MS4 contributing to this report include a protocol for evaluation and approval of banking and credit of alternative siting of a stormwater management practice?

Yes No

4d. How many stormwater management practices have been implemented as part of this system in this reporting period?

	1	6
--	---	---

5. What percent of municipal officials/MS4 staff responsible for program implementation attended training on Low Impace Development (LID), Better Site Design (BSD) and other Green Infrastructure principles in this reporting period?

	7	5
--	---	---

 %

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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6. Evaluating Progress Toward Measurable Goals MCM 5

Use this page to report on your progress and project plans toward achieving measurable goals identified in your Stormwater Management Program Plan (SWMPP), including requirements in Part III.C.1. Submit additional pages as needed.

A. Briefly summarize the Measurable Goal identified in the SWMPP in this reporting period.

-Continue to update database of current public and private practices as new facilities are implemented.
 -Continue to review all SWPPPs for proposed projects by the Town Engineering Department
 -Notify holders of stormwater maintenance agreements of operation and maintenance responsibilities (12)

B. Briefly summarize the observations that indicated the overall effectiveness of this Measurable Goal.

-(12) All private stormwater practices that discharge in the Town's MS4 have had documented maintenance activities or an engineered inspection.
 - 16) Inspections of currently active project construction are continuing and inventoried

C. How many times was this observation measured or evaluated in this reporting period?

		2	8
--	--	---	---

(ex.: samples/participants/events)

D. Has your MS4 made progress toward this measurable goal during this reporting period?

Yes No

E. Is your MS4 on schedule to meet the deadline set forth in the SWMPP?

Yes No

F. Briefly summarize the stormwater activities planned to meet the goals of this MCM during the next reporting cycle (including an implementation schedule).

-Continue to update database of public and private practices as new as new facilities are implemented
 -Continue to inventory construction inspections
 -Private post-construction practices are monitored for the five year threshold before an engineering inspection is warranted.

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

SPDES ID

N	Y	R	2	0	A	1	9	8
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Minimum Control Measure 6. Stormwater Management for Municipal Operations

The information in this section is being reported (check one):

- On behalf of an individual MS4
- On behalf of a coalition

How many MS4s contributed to this report?

--	--	--

1. Choose/list each municipal operation/facility that contributes or may potentially contribute Pollutants of Concern to the MS4 system. For each operation/facility indicate whether the operation/facility has been addressed in the MS4's/Coalition's Stormwater Management Program(SWMP) Plan and whether a self-assessment has been performed during the reporting period. A self-assessment is performed to: 1) determine the sources of pollutants potentially generated by the permittee's operations and facilities; 2) evaluate the effectiveness of existing programs and 3) identify the municipal operations and facilities that will be addressed by the pollution prevention and good housekeeping program, if it's not done already.

<u>Operation/Activity/Facility</u>	<u>Addressed in SWMP?</u>		<u>Self-Assessment Operation/Activity/Facility performed within the past 3 years?</u>	
	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Yes	<input type="radio"/> No
Street Maintenance.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Bridge Maintenance.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Winter Road Maintenance.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Salt Storage.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Solid Waste Management.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
New Municipal Construction and Land Disturbance..	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Right of Way Maintenance.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Marine Operations.....	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Hydrologic Habitat Modification.....	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Parks and Open Space.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Municipal Building.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Stormwater System Maintenance.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Vehicle and Fleet Maintenance.....	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other.....	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

SPDES ID

N	Y	R	2	0					
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2. Provide the following information about municipal operations good housekeeping programs:

- Parking Lots Swept (Number of acres X Number of times swept) # Acres

--	--	--	--	--
- Streets Swept (Number of miles X Number of times swept) # Miles

		1	4	5
--	--	---	---	---
- Catch Basins Inspected and Cleaned Where Necessary #

		6	3	5
--	--	---	---	---
- Post Construction Control Stormwater Management Practices Inspected and Cleaned Where Necessary #

			1	0
--	--	--	---	---
- Phosphorus Applied In Chemical Fertilizer # Lbs.

--	--	--	--	--
- Nitrogen Applied In Chemical Fertilizer # Lbs.

--	--	--	--	--
- Pesticide/Herbicide Applied (Number of acres to which pesticide/herbicide was applied X Number of times applied to the nearest tenth.) # Acres

					.	
--	--	--	--	--	---	--

3. How many stormwater management trainings have been provided to municipal employees during this reporting period?

				1
--	--	--	--	---

4. What was the date of the last training?

0	2	/	0	9	/	2	0	1	2
---	---	---	---	---	---	---	---	---	---

5. How many municipal employees have been trained in this reporting period?

	5	5
--	---	---

6. What percent of municipal employees in relevant positions and departments receive stormwater management training?

	9	1	%
--	---	---	---

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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7. Evaluating Progress Toward Measurable Goals MCM 6

Use this page to report on your progress and project plans toward achieving measurable goals identified in your Stormwater Management Program Plan (SWMPP), including requirements in Part III.C.1. Submit additional pages as needed.

A. Briefly summarize the Measurable Goal identified in the SWMPP in this reporting period.

- Departments should be made aware of Pollution prevention and measures and applicability to their facility.
- A Department self-assessment should be made every three years.

B. Briefly summarize the observations that indicated the overall effectiveness of this Measurable Goal.

- 55 Department staff received training on Pollution Prevention/Good Housekeeping.
- Department facilities are continued to be monitored for pollution prevention for municipal operations.

C. How many times was this observation measured or evaluated in this reporting period?

Town MS4 meetings, annual report interviews, data

			9
--	--	--	---

(ex.: samples/participants/events)

D. Has your MS4 made progress toward this measurable goal during this reporting period?

Yes No

E. Is your MS4 on schedule to meet the deadline set forth in the SWMPP?

Yes No

F. Briefly summarize the stormwater activities planned to meet the goals of this MCM during the next reporting cycle (including an implementation schedule).

- Continue facility audits for good housekeeping
- Continue to encourage departments to maintain a log of catch basin inspections, cleaning, road sweeping, repairs, etc.
- Obtain additional training for Municipal Pollution Prevention and Good Housekeeping as opportunity and budget permit

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9, 2 0 1 2

If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition TOWN OF POUGHKEEPSIE

SPDES ID
N Y R 2 0 A 1 9 8

Additional Watershed Improvement Strategy Best Management Practices

The information in this section is being reported (check one):

- On behalf of an individual MS4
- On behalf of a coalition

How many MS4s contributed to this report?

MS4s must answer the questions or check NA as indicated in the table below.

MS4 Description	Answer	Check NA	(POC)
NYC EOH Watershed			
Traditional Land Use	1,2,3,4,5,6,7a-d,8a,8b,9	10,11,12	Phosphorus
Traditional Non-Land Use	1,2,3,4,7a-d,8a,8b,9	5,10,11,12	Phosphorus
Non-Traditional	1,2,77a-d,8a,8b,9	3,4,5,10,11,12	Phosphorus
Onondaga Lake Watershed			
Traditional Land Use	1,6,7a-d,8a,9	2,3,4,5,8b,10,11,12	Phosphorus
Traditional Non-Land Use	1,6,7a-d,8a,9	2,3,4,5,8b,10,11,12	Phosphorus
Non-Traditional	1,6,7a-d,8a,9	2,3,4,5,8b,10,11,12	Phosphorus
Greenwood Lake Watershed			
Traditional Land Use	1,4,6,7a-d,8a,9	2,3,5,8b,10,11,12	Phosphorus
Traditional Non-Land Use	1,4,6,7a-d,8a,9	2,3,5,8b,10,11,12	Phosphorus
Non-Traditional	1,4,6,7a-d,8a,9	2,3,5,8b,10,11,12	Phosphorus
Oyster Bay			
Traditional Land Use	1,4,7a-d,9,10,11,12	2,3,5,6,8a,8b	Pathogens
Traditional Non-Land Use	1,4,7a-d,9,10,11,12	2,3,5,6,8a,8b	Pathogens
Non-Traditional	1,4,7a-d,9	2,3,4,5,8a,8b,10,11,12	Pathogens
Peconic Estuary			
Traditional Land Use	1,4,7a-d,8a,9,10,11,12	2,3,5,6,8b	Pathogens and Nitrogen
Traditional Non-Land Use	1,4,7a-d,8a,9,10,11,12	2,3,5,6,8b	Pathogens and Nitrogen
Non-Traditional	1,4,7a-d,8a,9	2,3,4,5,8b,10,11,12	Pathogens and Nitrogen
Oscawana Lake Watershed			
Traditional Land Use	1,4,6,7a-d,8a,9	2,3,5,8b,10,11,12	Phosphorus
Traditional Non-Land Use	1,4,6,7a-d,8a,9	2,3,5,8b,10,11,12	Phosphorus
Non-Traditional	1,4,6,7a-d,8a,9	2,3,5,8b,10,11,12	Phosphorus
LI 27 Embayments			
Traditional Land Use	1,2,3,4,7a-d,9,10,11,12	5,6,8a,8b	Pathogens
Traditional Non-Land Use	1,2,3,4,7a-d,9,10,11,12	5,6,8a,8b	Pathogens
Non-Traditional	1,2,3,4,7a-d,9	5,6,8a,8b,10,11,12	Pathogens

1. Does your MS4/Coalition have an education program addressing impacts of phosphorus/nitrogen/pathogens on waterbodies? Yes No N/A

2. Has 100% of the MS4/Coalition conveyance system been mapped in GIS? Yes No N/A

If N/A, go to question 3.

If No, estimate what percentage of the conveyance system has been mapped so far. N/A %

Estimate what percentage was mapped in this reporting period. N/A %

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOWN OF POUGHKEEPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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3. Does your MS4/Coalition have a Stormwater Conveyance System (infrastructure) Inspection and Maintenance Plan Program? Yes No N/A

4. Estimate the percentage of on-site wastewater treatment systems that have been inspected and maintained or rehabilitated as necessary in this reporting period?

N/A

 %

5. Has your MS4/Coalition developed a program that provides protection equivalent to the NYSDEC SPDES General Permit for Stormwater Discharges from Construction Activities (GP-0-08-001) to reduce pollutants in stormwater runoff from construction activities that disturb five thousand square feet or more? Yes No N/A

6. Has your MS4/Coalition developed a program to address post-construction stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre that provides equivalent protection to the NYS DEC SPDES General Permit for Stormwater Discharges from Construction Activities (GP-0-08-001), including the New York State Stormwater Design Manual Enhanced Phosphorus Removal Standards? Yes No N/A

7a. Does your MS4/Coalition have a retrofitting program to reduce erosion or phosphorus/nitrogen/pathogen loading? Yes No N/A

7b. How many projects have been sited in this reporting period?

N/A

7c. What percent of the projects included in 7b have been completed in this reporting period?

N/A

 %

7d. What percent of projects planned in previous years have been completed?

N/A

 %

No Projects Planned

8a. Has your MS4/Coalition developed and implemented a turf management practices and procedures policy that addresses proper fertilizer application on municipally owned lands? Yes No N/A

8b. Has your MS4/Coalition developed and implemented a turf management practices and procedures policy that addresses proper disposal of grass clippings and leaves from municipally owned lands? Yes No N/A

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9,

2	0	1	2
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If submitting this form as part of a joint report on behalf of a coalition leave SPDES ID blank.

Name of MS4/Coalition

TOEN OF POUGHKPSIE

SPDES ID

N	Y	R	2	0	A	1	9	8
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9. Has your MS4/Coalition developed and implemented a program of native planting?
 Yes No N/A

10. Has your MS4/Coalition enacted a local law prohibiting pet waste on municipal properties and prohibiting goose feeding?
 Yes No N/A

11. Does your MS4/Coalition have a pet waste bag program?
 Yes No N/A

12. Does your MS4/Coalition have a program to manage goose populations?
 Yes No N/A

ENGINEERING DEPARTMENT
Town of Poughkeepsie

PETER D. SETARO, P. E.
Town Engineer

ONE OVEROCKER ROAD
POUGHKEEPSIE, NY 12603

DONALD A. BEER
Associate Town Engineer

TEL # (845) 790-4736

SEAN CRIMMINS
Assistant Town Engineer

TEL # (845) 790-4767

MEMORANDUM

DATE: 5/31/12

To: Todd Tancredi, Town Supervisor
From: Sean Crimmins, Assistant Town Engineer
Subject: Response to public comments on the 2011-2012 MS4 Draft Annual Report;
Town of Poughkeepsie SPDES permit #NYR20A198

=====

A draft Annual Report on the Town of Poughkeepsie's compliance with the MS4 storm water management program was made available for public comment between the dates of May 9th to May 18th, 2012 as per a Town Board decision on April 25th, 2012. The report was made available to the public on the Town's website on May 5th, 2012.

A comment was received on May 18th, 2012 from Sean Eagleton, Town Board member. The comment is reprinted below, followed by a response from the Town Engineering Department:

1) **COMMENT:** *For MCM 4 and 5 the report needs to make clear who is performing the required inspections and training and who, for the purpose of the MS4 report, is evaluating the effectiveness of the required inspections and training. I'm not sure if staff from Morris Associates is fulfilling both functions.*

If staff from Morris Associates is fulfilling both functions for this reporting period, I strongly recommend that for future MS4 reports that the evaluations, or auditing, be performed by an independent entity.

RESPONSE: Comment noted. The Town Board may, if it so chooses, hire a qualified third party engineer or engineering firm to prepare the annual MS4 Report or to perform audit work in regard to the construction inspections performed by Morris Associates. By way of background the Town of Poughkeepsie has contracted with Morris Associates Engineering Consultants, PLLC, to provide Town Engineering services inclusive of construction site SWPPP inspections on behalf of the Town as a regulated MS4. MS4 regulations require licensed professionals or trained individuals to conduct construction

site SWPPP inspections, both for the owner/developer and for the Town. The NYS DEC certifies trainers and courses for those purposes such as those provided the last two years by the Dutchess County Soil & Water Conservation District. The Town's inspector, Morris Associates, has licensed professionals and trained staff, and the Town has trained staff (such as enforcement personnel) who are also involved in construction and post-construction review of project compliance with the General Permit standards.

Inspection and training activities are quantified but not detailed in the 2011-12 Annual Stormwater Report, due to the report format required by the NYS DEC. The Town's Engineering Department compiled the 2011-12 Annual Stormwater Report based upon data reported by Town departments, consultants to the Town, and consultants to the various private parties undertaking construction activities in the Town. The NYS Department of Environmental Conservation evaluates the effectiveness of the Town's Stormwater Management Program by conducting a municipal audit on a periodic basis. NYS DEC's last audit of the Town of Poughkeepsie in May 2010 documented the Town's stormwater program activities and provided an overall rating of "Satisfactory", the best of three rankings available.

A set of written comments were received on May 17th, 2012 from Doreen Tignanelli. Each comment is reprinted below in its entirety and is followed by a response from the Town Engineering Department:

1) COMMENT: *At the October 19, 2011 Town Board Meeting, town resident James Tuttle of 1218 Dutchess Turnpike made a presentation to the Town Board showing damage to his property due to drainage problems he attributed to Stratford Farms development project. Several feet of dirty water was rushing through his house and garage. Town Board member Stephan Krakower asked Mr. Tuttle if he had runoff that way prior to the development and Mr. Tuttle responded "No, I have lived here since 1984 and I never had this kind of problem". Later on in the meeting, Councilman Krakower noted the increase in such incidents throughout the town as parcels are being developed stating "we have to be more vigilant in the review of these projects". He also noted that eventually these projects "seem to have problems and none of them seem to work as perfectly as they were originally engineered for". Referring to Mr. Tuttle, Councilman Krakower stated "this poor guy shouldn't have to take his Wednesday night to show us pictures of how a new development flooded him out". Councilman Krakower stated that "the Town bears some responsibility in making sure that these things don't happen", noting the responsibility of the Town Board, Planning Board, Zoning Board and Town Engineer and that "this should never have gotten this far". In its monthly inspection of construction sites on behalf of the town, consultant Morris Associates noted in its November 14, 2011 inspection report that the town's engineering department - also comprised of Morris Associates employees- "requested an engineering solution to incomplete drainage facilities that seem to effect nearby property". As noted by Councilman Krakower, residents throughout the Town are being affected by such issues. The Town should conduct a thorough review of procedures currently in place to determine failings so that improvements can be made and future incidents avoided.*

RESPONSE:

With regard to the Stratford Farms development, the SWPPP for that project was prepared and reviewed under an earlier NYS DEC General Permit for Stormwater Discharges with requirements that are substantially different than the 2010 General Permit requirements. For example, under the General Permit in effect at the time of project approval there was no provision specifically restricting the clearing of land to no more than 5 acres of land at any one time. The owner of the Stratford Farms project cleared the land in its entirety, which it was permitted to do under the old General Permit, but never completed the site improvements such as the road and drainage system which would have controlled storm water runoff and prevented the flooding that was reported by neighboring property owners. The complete clearing of land and halt to completion of site improvements would not be permitted under the current storm water regulations without the installation of interim storm water control measures. In this particular case, and in response to the flooding experienced by neighboring owners, the Town negotiated with the project owner the installation of a temporary sediment basin to mitigate the flooding condition. An approximate 600 foot long x 4 foot high basin was constructed to direct stormwater away from the affected off-site properties and into the storm water system. Upon completion of the basin the Town has not received any additional complaints of flooding.

A comprehensive, multi-department review process is already in place for any development project within the Town. This review process ensures compliance with current MS4 regulations. Every project disturbing over one acre of land requires a Stormwater Pollution Prevent Plan (SWPPP) that is reviewed by the Town Engineering Department as well as the Building and Planning departments. All erosion control devices and plans are also reviewed by the Town Engineering Department and discussed during all pre-construction meetings. The owner is responsible for regular site inspections (usually weekly depending on the pace and phasing of construction activities) by a licensed professional engineer or other qualified individual, and the Town Engineering Department undertakes periodic and monthly inspections during construction. Additionally, trained personnel from the Town Building Department and Planning Department conduct periodic spot checks of construction activities to ensure continued compliance with the Town MS4 regulations.

2) COMMENT: *Minimum Control Measure 4, Construction Site Stormwater Runoff Control:* *It is not clear if required weekly SWPPP reports are being supplied on a timely basis and, if they are, whether they are being reviewed in a timely manner so that violations can be promptly corrected. According to the prior 2010-2011 Annual Stormwater Report, "The Town's consulting engineer conducts inspections on behalf of the Town, and reviews inspection reporting by owners/applicants. Such reports are maintained on file by the Town". The town's consulting engineer is Morris Associates. A January 9, 2012 Morris Associates inspection report for The Park at Inwood Lake notes that Inwood Lake's "weekly SWPPP reports for November and December continue to show the need for maintenance or reconstruction of erosion and sediment control items". The fact that weekly reports over a two-month period showed a "continued" need for maintenance calls into question who in the town - or on behalf of the town -was reviewing these reports for compliance and why the situation was allowed to continue for several months.*

RESPONSE: MS4 regulations require regular construction site SWPPP inspections by a licensed professional engineer or other qualified individual. The owner/developer's qualified person is required to inspect construction site conditions and provide a written report to the owner/developer (usually weekly depending on the pace and phasing of construction activities) detailing compliance, or lack of compliance with the Town's MS4 requirements. A copy of that report is also required to be filed with the Town Engineering Department. The Town Engineering Department also conducts monthly inspections of construction activities and provides a written report to the Town. These reports cover numerous projects and are on file and are quantified in the 2011-12 Annual Report. The great majority of the reports indicate "satisfactory" conditions at most of the active and inactive construction sites.

During the 2011-12 reporting year, the Town has reviewed and revised its internal procedures to more quickly resolve construction site deficiencies when they are identified by developer and Town inspections: Employees of the Town Planning, Building, and Engineering departments began regular review of inspection reports to determine if new or continued violations exist, established a communication system to better coordinate with the Town's consulting professional engineers, developer representatives, and enforcement personnel to initiate enforcement action where required. Anecdotal experience suggests that these measures have resulted in expedited site compliance, usually by voluntary action of the owner/developer. The Town continues to monitor the effectiveness of its compliance assessment and enforcement procedures to ensure construction and post-construction site compliance.

The nature of the discrepancies observed at the Inwood Lake site consisted of the lack of vegetation maintenance to the quality control ponds and other small issues. Because it was not an immediate threat to surrounding property owners or water quality, Planning staff did not feel that enforcement action was warranted and a verbal warning was given to the owners. As per a site visit by the Town's consultant and the Planning Department in May, 2012, all issues have been satisfactorily resolved.

3) COMMENT: *Minimum Control Measure 4, Construction Site Stormwater Runoff Control, Evaluating Progress Toward Measurable Goals MCM 4, #7F, states that the town will "Continue to inspect and enforce erosion control measures". Yet, as noted in the above comment, weekly reports over a two-month period showed "continued" problems with erosion and sediment control measures.*

RESPONSE: As noted above, the primary responsibility for inspection and enforcement is the owner/developer, who is responsible for regular construction site inspections in accordance with MS4 regulations and for providing maintenance or other action to address identified deficiencies. The Town's consulting engineer conducts monthly inspections and communicates deficiencies to the owner's site manager or contractor, and to the Town. Based on an assessment of the severity of a reported violation, and consideration as to the timing of when compliance will be achieved, the Town may or may not commence formal as opposed to informal enforcement proceedings. The Town does not perform construction site maintenance but looks to the owner/developer to voluntarily

comply with the MS4 regulations subject to Town enforcement. The Town issued 33 Notices of Violation and 20 Orders to Remedy in 2011-12. These appear to have been generally sufficient to resolve non-compliant conditions without the need for a Stop Work Order or the issuance of tickets. As noted in Response to Comment #2, the Town has reviewed and revised its internal review and assessment procedures during the 2011-12 reporting year, to improve its response to reported construction site deficiencies and resolve non-compliance through communication and enforcement action as required.

4) COMMENT: *Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, includes Stormwater Pollution Prevent Plan (SWPPP) reviews and inspections. On behalf of the town, Morris Associates reviews and comments on SWPPPs, inspects construction sites for SWPPP compliance, issues monthly inspection reports on SWPPP compliance and prepares the town's Stormwater Management Program Annual Report. As the Stormwater Management Program Annual Report is basically a report card on how well the above-mentioned tasks are being performed, Morris Associates is performing a self-evaluation. The lack of checks and balances is cause for concern.*

RESPONSE: As discussed above the Town of Poughkeepsie has retained the services of Morris Associates to perform general engineering inspection services inclusive of SWPPP reviews and the preparation of the 2011-12 Annual Report. The Annual Report is a **tally** of all of the stormwater activities during the reporting year as reported by numerous sources. The information compiled for Minimum Control Measures 4 and 5 was gathered from various persons and departments in the Town including the Planning Department, Building Department, Zoning Department, Engineering Department, Highway Department, Water Department, and Sewer Department, as well as various consultants retained by the Town. Measurable goals and observations were prepared and reviewed with relevant Town staff. The Draft and Final reports were finalized in consultation with the Town's Stormwater Contact person and the Director of Municipal Development.

The NYS Department of Environmental Conservation evaluates the effectiveness of the Town's Stormwater Management Program by conducting a municipal audit on a periodic basis. NYS DEC's last audit of the Town of Poughkeepsie in May 2010 documented the Town's stormwater program activities and provided an overall rating of "Satisfactory", the best of three rankings available.

5) COMMENT: *Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, #6, identification of enforcement actions against construction sites during the reporting period shows no Stop Work Orders were issued. This is in spite of the fact that some monthly construction site inspections conducted by Morris Associates noted repeated marginal compliance and violations on several projects and recommended issuance of Stop Work Orders. The town should be more diligent in issuing Stop Work Orders in order to ensure timely compliance with town stormwater laws that, according to town code, were enacted to "provide for the health, safety, and general welfare of the citizens of the Town of Poughkeepsie". For example, marginal compliance and concerns about winter shutdown were noted for The Gables IV starting in October 2011 with*

concerns through March 2012, culminating in a March 7, 2012 report from Morris Associates recommending that the town issue a Stop Work Order. Another example is The Park at Inwood Lake which also had marginal compliance noted by Morris Associates inspections starting in October 2011. Concerns resulting from a January 9, 2012 report from Morris Associates discussed the need for a Stop Work Order. Note: The need for a Stop Work Order was still being discussed months later in May 2012. I realize this is out of the date range for the report period but is given for perspective and need not be addressed until I comment on it as part of next year's annual report.

RESPONSE:

Construction site inspections by owners' qualified personnel (usually weekly depending on the pace and phasing of construction activities) and by the Town's qualified inspectors (Morris Associates and other review consultants, usually monthly) on numerous projects are on file and are quantified in the 2011-12 Annual Report.

The comment relating to selected reports is noted. During the 2011-12 reporting year, the Town revised its internal procedures to more quickly resolve construction site deficiencies when they are identified by developer and Town inspections: This procedure includes a regular review of inspection reports to determine if violations exist, and coordination with Morris Associates staff in on-site meetings with developer representatives and referral to enforcement personnel for action as required. Recent empirical experience suggests that these measures have resulted in expedited site compliance, usually by voluntary action of the owner/developer. The Town will continue to monitor the effectiveness of these procedures to ensure construction site compliance.

6) COMMENT: *Minimum Control Measure 3, Illicit Discharge Detection and Elimination, #11, states 63% of staff in relevant positions received IDDE training, decreasing from the 66% stated in the prior 2010-2011 Stormwater Annual Report. The prior year's response to my comment on this stated that the town had a goal of "obtaining professional IDDE training in 2011-2012 for 5 employees". It is not clear if this specific goal was met since the percentage decreased. If the prior goal was not met, the goal stated for next reporting cycle, #12F, should be more aggressive than "trainings will continue".*

RESPONSE: IDDE training was offered on February 9th, 2012 by the Dutchess County Soil and Water Conservation District. Approximately 22 staff members of an estimated 35 in relevant positions and departments were trained, exceeding the 2010-2011 Annual Report goal of 5 employees and resulting in the 63% for the 2011-2012 reporting year. If the number of staff with valid, prior training had been counted, the percentage would have been higher.

7) COMMENT: *Minimum Control Measure 6, Stormwater Management for Municipal Operations, #7C", states number of observations as "9" "Town MS4 meetings, annual report interviews, and data". I was not afforded the opportunity to comment on the "9" observations associated with this measure. The Town Board passed a resolution on May*

9th, 2012 to accept the draft Stormwater Annual Report with a public comment period to end at 4 pm on May 18th. On May 9th, I filed a Freedom of Information Law request to inspect records associated with the "9" observations noted in #7C. However, the response from the Town's Stormwater Public Contact was that the requested records would be made available to me by June 8, 2012 which is past the public comment end date of May 18, 2012. According to the Committee on Open Government, *Explanation of Time Limits for Response*, "when records are clearly available to the public under FOIL, or if they are readily retrievable, there may be no basis for a delay in disclosure". <http://www.dos.ny.gov/coog/explanation.html> If these records requested under FOIL on May 9th were, in fact, used to prepare the draft Annual Stormwater Report accepted by the board on May 9th, it would seem that the records should be "readily retrievable" and available. I also received the same response to another FOIL request for the "self inspection" reports associated with the 13 Construction Stormwater Pollution Prevention Plans (SWPPPs) referenced in "**Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, #3**" of the draft 2011-2012 Stormwater Annual Report. The 30-day delay in disclosure of these records intentionally or unintentionally limits the ability for the public to comment on these portions of the draft 2011-2012 report.

RESPONSE: The nine observations consist of the data collected from the nine departments within the Town of Poughkeepsie. Those departments are the Engineering Department, the Recreation Department, the Highway Department, the Building Department, the Auto Maintenance Department, the Planning Department, the Sewer Department, the Water Department and the Zoning Department. These documents and the SWMPP are available for review within the Town's Engineering Department.

As noted above, the requested records are presented in the Annual Report as summary data reported from various sources. The commenter was advised that the referenced enforcement actions and self-inspection reports associated with SWPPPs--which relate to specific projects at various stages of review and implementation--will take up to a maximum of 30 days from the May 9, 2012 FOIL request (i.e. by June 8, 2012) to gather and present. The suggestion that there is an intentional delay on the part of the Town in producing these records is erroneous and completely overlooks the difficulty in producing records for one request amongst the many FOIL requests received on any given day in addition to the regular work duties of Town staff.

8) COMMENT: *Minimum Control Measure 1, Public Education and Outreach, Evaluating Progress Toward Measurable Goals MCM 1, #4F:* Measurable goal for the next reporting cycle should include updating the online Stormwater Management Program Plan (SWMPP). The SWMPP dated April 2010 that is available to the public online on the Town's website is not current. According to the Town's Stormwater Contact, the April 2010 SWMPP has been modified and/or supplemented since that date and the updated version SWMPP is not available in electronic format. While the updated SWMPP is available for inspection, in person, by appointment, at Town Hall, having the updated SWMPP available online would increase "**Minimum Control Measure 2, Public Involvement/Participation**" by allowing town residents who cannot get to Town Hall during weekday hours of 8 am to 4 pm to access the SWMPP online at their convenience.

RESPONSE: Comment noted. MM1, Item 4F, “Goals during the next reporting cycle” has been revised to add, “Ensure that the 2011-2012 SWMPP is available for public review on the Town’s website.” It is further noted that the SWMPP is a continually changing document with maps and data that are not readily scannable with equipment available within the Town. Revisions later than the online posted document are available by calling the Town Engineering Department between 8am and 4pm.