



1 Overocker Road
Poughkeepsie, NY 12603

Town of Poughkeepsie

Planning & Zoning

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

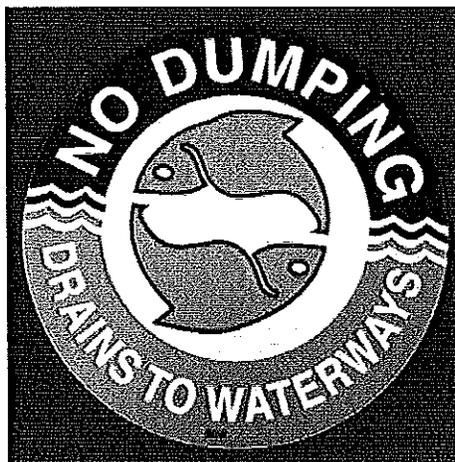
TOWN OF POUGHKEEPSIE

STORMWATER MANAGEMENT PROGRAM

2014-2015 ANNUAL REPORT

SPDES PERMIT NUMBER: NYR20A198

Prepared for:
Town of Poughkeepsie Town Board



FINAL REPORT

Dated May 28, 2015

MS4 Annual Report Cover Page

MCC form for period ending March 9, 2015

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

SPDES ID
N Y R 2 0 A

MS4 Municipal Compliance Certification(MCC) Form

MCC form for period ending March 9, 2015

Name of MS4 TOWN OF POUGHKEEPSIE

SPDES ID
N Y R 2 0 A 1 9 8

Section 2 - Contact Information

Important Instructions - Please Read

Contact information must be provided for each of the following positions as indicated below:

1. Principal Executive Officer, Chief Elected Official or other qualified individual (per GP-0-08-002 Part VI.J).
2. Duly Authorized Representative (Information for this contact must only be submitted if a Duly Authorized Representative is signing this form)
3. The Local Stormwater Public Contact (required per GP-0-08-002 Part VII.A.2.c & Part VIII.A.2.c).
4. The Stormwater Management Program (SWMP) Coordinator (Individual responsible for coordination/implementation of SWMP).
5. Report Preparer (Consultants may provide company name in the space provided).

A separate sheet must be submitted for each position listed above unless more than one position is filled by the same individual. If one individual fills multiple roles, provide the contact information once and check all positions that apply to that individual.

If a new Duly Authorized Representative is signing this report, their contact information must be provided and a signature authorization form, signed by the Principal Executive Officer or Chief Elected Official must be attached.

For each contact, select all that apply:

- Principal Executive Officer/Chief Elected Official
- Duly Authorized Representative
- Local Stormwater Public Contact
- Stormwater Management Program (SWMP) Coordinator
- Report Preparer

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

Title
S U P E R V I S O R

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

City State Zip
P O U G H K E E P S I E N Y 1 2 6 0 3 -

eMail
T T A N C R E D I @ T O W N O F P O U G H K E E P S I E - N Y . G OV

Phone County
(8 4 5) 4 8 5 - 3 6 0 3 D U T C H E S S

MS4 Municipal Compliance Certification(MCC) Form

MCC form for period ending March 9, 2015

Name of MS4 TOWN OF POUGHKEEPSIE

SPDES ID
N Y R 2 0 A 1 9 8

Section 2 - Contact Information

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Contact information must be provided for *each* of the following positions as indicated below:

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2. Duly Authorized Representative (Information for this contact must only be submitted if a Duly Authorized Representative is signing this form)
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4. The Stormwater Management Program (SWMP) Coordinator (Individual responsible for coordination/implementation of SWMP).
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A separate sheet must be submitted for each position listed above unless more than one position is filled by the same individual. If one individual fills multiple roles, provide the contact information once and check all positions that apply to that individual.

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For each contact, select all that apply:

- Principal Executive Officer/Chief Elected Official
- Duly Authorized Representative
- Local Stormwater Public Contact
- Stormwater Management Program (SWMP) Coordinator
- Report Preparer

First Name SEAN MI F Last Name CRIMMINS

Title ASSISTANT ENGINEER

Address ONE OVEROCKER ROAD

City POUGHKEEPSIE State NY Zip 12603

eMail SCRIMMINS@TOWNOFPOUGHKEEPSIE-NY.GOV

Phone (845) 790-4748 County DUTCHESS

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9, 2015

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

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

- Construction Site Operators Trained # Trained 5 1
- Direct Mailings # Mailings 0
- Kiosks or Other Displays # Locations 6
- List-Serves # In List 3 0 4
- Mailing List # In List 0
- Newspaper Ads or Articles # Days Run 2 1
- Public Events/Presentations # Attendees 1 9 6 1
- School Program # Attendees 0
- TV Spot/Program # Days Run 0
- Printed Materials: Total # Distributed 1 9 8 0

Locations (e.g. libraries, town offices, kiosks)

T O W N H A L L - M U L T I P L E
D C S O I L / W A T E R D I S T
A D A M S F A I R P O K
D U T C H E S S C O F A I R

Other:

F A C E B O O K C A M P A I G N

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

URL
h t t p : / / w w w . t o w n o f p o u g h k e e p s i e . c o
m / p l a n n i n g / s t o r m w a t e r / s t o r m w a t e r
_ i n f o r m a t i o n . h t m l

URL
h t t p : / / d u t c h e s s s w c d . o r g / ? P A G E _ i d
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h t t p : / / w w w . d e c . n y . g o v / c h e m i c a l / 8468.html

MS4 Annual Report Form

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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

3. Web Page cont.: Provide specific web addresses - not home page.

URL

URL

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MS4 Annual Report Form

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

2	0	1	5
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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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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.

-Continued involvement with the Dutchess County MS4 Committee* on educational functions and trainings for the 2014-2015 year.
 *-Complete billboard campaign
 *-Continue to sponsor public involvement campaigns (ex. Trout Unlimited)

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

-Via MS4 committee, continued stormwater educational programs and printed material throughout Dutchess County, e.g, Adams Spring Landscaping Event in Poughkeepsie (1), Dutchess County Fair (1), (2) Contractor training sessions, Envirothon in Fishkill (1) 2014 Southeast NY Stormwater Conference in Beacon, NY (1) and the Arlington Street Fair (1). Attendance at presentations and quantity of distributed educational materials are generally consistent with previous reporting periods.

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

			7
--	--	--	---

(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).

-The following are the goals for the DC Soil and Water Committee for the 2015-2016 year: MS4 Training (4 regional events, Post-Construction, SMO and Reviewer including Green Infrastructure), Develop new brochures, Stormwater training for local judges, reprint pollution prevention manual, create fillable forms in pollution prevention manuals, increased attendance.

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9, 2 0 1 5

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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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.

0 5 / 0 1 / 2 0 1 5

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

3 6 5

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?

0 5 / 0 7 / 2 0 1 4 *

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 N/A No

If No, is one planned for each?

Yes N/A No

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,

2	0	1	5
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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 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.

-Continue to support Dutchess County MS4 Committee and other watershed groups in the community.
-Continue to enhance content and accessibility of the Town's stormwater page.

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

-Approximately (279) persons attended the stakeholder meetings
-(1) Public hearing on Annual report held on 5/7/2014
-The Town's website continued to include updated information pertaining to the MS4 (1)

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

2	8	1
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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 County MS4 Committee and other watershed groups in the community.
-Continue to enhance content and accessibility of the Town's stormwater page.

MS4 Annual Report Form

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

2	0	1	5
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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

T	O	W	N	O	F	P	O	U	G	H	K	E	E	P	S	I	E
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SPDES ID

N	Y	R	2	0	A	1	9	8
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Minimum Control Measure 3. Illicit Discharge Detection and Elimination

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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1. Enter the number and approx. percent of outfalls mapped:

		5	9	2
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 #

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

 %

2. How many of these outfalls have been screened for dry weather discharges during this reporting period (outfall reconnaissance inventory)?

1	4	1
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3.a. What types of generating sites/sewersheds were targeted for inspection during this reporting period?

- Auto Recyclers
- Building Maintenance
- Churches
- Commercial Carwashes
- Commercial Laundry/Dry Cleaners
- Construction Vehicle Washouts
- Cross-Connections
- Distribution Centers
- Food Processing Facilities
- Garbage Truck Washouts
- Hospitals
- Improper RV Waste Disposal
- Industrial Process Water
- Landscaping (Irrigation)
- Marinas
- Metal Plateing Operations
- Outdoor Fluid Storage
- Parking Lot Maintenance
- Printing
- Residential Carwashing
- Restaurants
- Schools and Universities
- Septic Maintenance
- Swimming Pools
- Vehicle Fueling
- Vehicle Maint./Repair Shops
- Other:
- None

S	I	T	E	S		T	A	R	G	E	T	E	D		B	Y		W	A	T	E	R	S	H	E	D	S				
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Sewersheds:

H	U	D	S	O	N	,		F	A	L	L	K	I	L	L	,		W	A	P	P	I	N	G	E	R				
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MS4 Annual Report Form

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

2	0	1	5
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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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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.

-100% of all staff in relevant positions and departments will receive training (training is valid for a three year period).
-Departments will continue to record IDDE occurrences and maintenance actions

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

-The Town Engineering department conducted (141) inspections (24%) this last reporting period; Outfalls needing attention were reported to the Town Highway Department
-Town Departments continue to observe and report IDDE events (16)
-Department and municipal staff were trained in IDDE (9 out of 42 staff in relevant positions)

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

	1	6	6
--	---	---	---

(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).

-Departments will continue to record IDDE occurrences and maintenance actions
-Department and municipal staff were trained in IDDE (33 out of 42 staff in relevant positions) after the reporting period ended

MS4 Annual Report Form

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

2	0	1	5
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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 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?

--	--	--

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
--	---	---

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	0
--	---	---

*

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 #

--	--	--	--	--	--

 No Authority
- Stop Work Orders #

--	--	--	--	--	--

 No Authority
- Criminal Actions #

--	--	--	--	--	--

 No Authority
- Termination of Contracts #

--	--	--	--	--	--

 No Authority
- Administrative Fines #

--	--	--	--	--	--

 No Authority
- Civil Penalties #

--	--	--	--	--	--

 No Authority
- Administrative Orders #

--	--	--	--	--	--

 No Authority
- Enforcement Actions or Sanctions #

--	--	--	--	--	--

 No Authority
- Other #

					8
--	--	--	--	--	---

 No Authority

* VERBAL NOTICES:
5 - Notices of Violation
3 - Stop Work Orders

MS4 Annual Report Form

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

2	0	1	5
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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?

		4
--	--	---

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

N/A

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, 2015

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

6. con't.:

Submit additional pages as needed.

● MS4/Coalition Office

Department

Address

City

Zip

-

Phone

() -

○ 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	5
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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.

- | |
|---|
| -Continue to train and document the certification of contractors/staff throughout the year.
-Continue to inspect and enforce erosion control measures
-Continue to update MS4 inventory of active construction sites. |
|---|

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

- | |
|---|
| -(51)-contractors were trained for certifications through Dutchess County Soil and Water
-100% (12) of active construction sites were inspected for compliance by the Town; notices or violations were enforced as needed.
-MS4 inventory of active construction sites were continually updated (4)
-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?

		6	7
--	--	---	---

(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
-Continue to update MS4 inventory of active construction sites. |
|---|

MS4 Annual Report Form

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Name of MS4/Coalition

SPDES ID

Minimum Control Measure 5. Post-Construction Stormwater Management

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 and what type of post-construction stormwater management practices has your MS4/Coalition inventoried, inspected and maintained in this reporting period?

	# Inventoried	# Inspections	# Times Maintained
<input checked="" type="radio"/> Alternative Practices	<input type="text" value=""/> <input type="text" value=""/> 5	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> <input type="text" value=""/> 5
<input checked="" type="radio"/> Filter Systems	<input type="text" value=""/> 1 <input type="text" value=""/> 0	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> 1 <input type="text" value=""/> 0
<input checked="" type="radio"/> Infiltration Basins	<input type="text" value=""/> <input type="text" value=""/> 9	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> <input type="text" value=""/> 9
<input checked="" type="radio"/> Open Channels	<input type="text" value=""/> <input type="text" value=""/> 5	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> <input type="text" value=""/> 5
<input checked="" type="radio"/> Ponds	<input type="text" value=""/> 1 <input type="text" value=""/> 6	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> 1 <input type="text" value=""/> 6
<input type="radio"/> Wetlands	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>
<input checked="" type="radio"/> Other	<input type="text" value=""/> <input type="text" value=""/> 5	<input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/>	<input type="text" value=""/> <input type="text" value=""/> 5

* Three completed projects added three infiltration systems and one roadside open channel.

2. Do you use an electronic tool (e.g. GIS, database, spreadsheet) to track post-construction BMPs, inspections and maintenance? Yes No

3. What types of non-structural practices have been used to implement Low Impact Development/Better Site Design/Green Infrastructure principles?

- Building Codes Municipal Comprehensive Plans
- Overlay Districts Open Space Preservation Program
- Zoning Local Law or Ordinance
- None Land Use Regulation/Zoning
- Watershed Plans Other Comprehensive Plan

Other:

MS4 Annual Report Form

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

2	0	1	5
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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?

		4
--	--	---

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?

	6	0
--	---	---

 %

MS4 Annual Report Form

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

2	0	1	5
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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 public and private practices 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.

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

-(17) All private stormwater agreements that have BMP's that discharge in the Town's MS4 have had documented maintenance activities or an engineered inspection.
-(11) All Town owned BMP's have been inspected or maintained this reporting period.
-(4) Inspections of currently active project construction are continuing and inventoried
-(3) projects entered the post-maintenance period with a signed NOT from the Supervisor

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

		3	5
--	--	---	---

(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 private practices as new facilities are implemented.
-Continue to update database of public practices 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 from the time of the NOT signature.

MS4 Annual Report Form

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

2	0	1	5
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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 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?

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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"/> No	<input type="radio"/>	<input checked="" type="radio"/> No
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"/> No	<input type="radio"/>	<input checked="" type="radio"/> No
Hydrologic Habitat Modification.....	<input type="radio"/>	<input checked="" type="radio"/> No	<input type="radio"/>	<input checked="" type="radio"/> No
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"/> No	<input type="radio"/>	<input checked="" type="radio"/> No

MS4 Annual Report Form

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

2	0	1	5
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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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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	8
--	--	---	---	---
- Catch Basins Inspected and Cleaned Where Necessary #

		6	0	0
--	--	---	---	---
- 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.

				3
--	--	--	--	---
- Pesticide/Herbicide Applied # Acres

		1	4	.	2
--	--	---	---	---	---

(Number of acres to which pesticide/herbicide was applied X Number of times applied to the nearest tenth.)

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

				4
--	--	--	--	---

4. What was the date of the last training?

1	2	/	1	2	/	2	0	1	4
---	---	---	---	---	---	---	---	---	---

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?

1	0	0	%
---	---	---	---

MS4 Annual Report Form

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

2	0	1	5
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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 will continue to review the Pollution Prevention for Municipal Operations manual
 -Departments will keep more specific records on the trainings that are conducted for their employees (IDDE trainings, Municipal Operations and Good Housekeeping trainings, etc.)

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

-(2) Applicable Departments underwent a facility self-assessment in regards to stormwater pollution prevention
 - (42 staff has IDDE training, 7 had pollution prevention for municipal operation training and 6 had soil and erosion control training)

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

		5	7
--	--	---	---

(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).

- Departments will continue to review the Pollution Prevention for Municipal Operations manual
 -Departments will keep more specific records on the trainings that are conducted for their employees (IDDE trainings, Municipal Operations and Good Housekeeping trainings, etc.)

MS4 Annual Report Form

This report is being submitted for the reporting period ending March 9, 2 0 1 5

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	5
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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	5
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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 POUGHKEEPSIE

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

May 15, 2015

Supervisor Todd Tancredi
One Overocker Road
Poughkeepsie NY 12603

Subject: Public Comment Draft Stormwater Management Program Annual
Report for period ending March 9, 2015

I offer the following public comment on the Town's draft Stormwater
Management Program Annual Report for the period ending March 9, 2015.

As required by NYSDEC SPDES General Permit for Stormwater
Discharges from MS4s, a summary of comments and intended responses
must be included in the annual report and the final report must be made
available for public inspection.

1) **Minimum Control Measure 1, Public Education and Outreach, #3, Public Events/Presentations**, lists #Attendees as 1,961 which is eight times more than the 237 attendees listed in the prior year's Annual Report. The amount of the increase seems questionable particularly since it is stated in # **4B** that attendance at presentations is "generally consistent with previous reporting periods."

2) **Minimum Control Measure 1, Public Education and Outreach, #3, Web Page**, states that specific web addresses must be provided.

Web Page URL <http://www.dec.ny.gov/chemical/8468.htm> produces an error message stating "**NYS Department of Environmental Conservation Missing Page**"

Web Page URL http://dutchessswcd.org/?page_id=202 provides outdated Town of Poughkeepsie information as the link on this Dutchess County Soil and Water Conservation District page points to the 2012-2013 Annual Report for the Town and, furthermore, it is only the Draft Annual Report and not even the final 2012-2013 Annual Report.

3) Minimum Control Measure 1, Public Education and Outreach, Evaluating Progress Toward Measurable Goals MCM 1, #4A, summary of Measurable Goal identified in the SWMPP in this reporting period states "*-Complete billboard campaign" for 2014-2015 year.

Town of Poughkeepsie Zoning Code 210-122 specifically prohibits billboard signs so it is not clear how this is considered progress toward measurable goals for the Town of Poughkeepsie.

4) Minimum Control Measure 1, Public Education and Outreach, Evaluating Progress Toward Measurable Goals MCM 1, #4F, summary of stormwater activities planned to meet the goals of this MCM during the next reporting cycle states that an "implementation schedule" must be included yet, year after year, this requirement is ignored.

However, no specific schedule was included.

The required implementation schedule must be provided.

5) Minimum Control Measure 2, Public Involvement/Participation, opportunities for public participation, #1, Community Meetings" quantifies #Attendees as 260, up from only 10 Attendees in the prior year.

Again, the amount of the increase seems questionable particularly since it is stated in the report that public attendance has been "generally consistent with previous reporting periods."

6) Minimum Control Measure 2, Public Involvement/Participation, opportunities for public participation, #1, Stakeholder Meetings" quantifies #Attendees as 279, up from only 17 Attendees in the prior year.

Again, this huge increase seems questionable particularly since it is stated in the report that public attendance has been "generally consistent with previous reporting periods."

7) Minimum Control Measure 2, Public Involvement/Participation #2,

regarding public notice of availability of annual report, it is stated that report availability was publicized via "List-Serve" numbering "116".

The Town's Stormwater Public Contact is either inadvertently or intentionally misrepresenting this Minimum Control Measure which calls into question the integrity of data in the rest of the report.

While I received list-serve notices regarding education during the report period ending March 2015, **yet again**, I did not receive notification of the availability of the draft Annual Report through the list-serve run by the Town's Stormwater Public Contact Eric Hollman.

This same situation occurred for the report periods ending March 2013 and March 2014 and the town's response to my comment then was "as noted".

The fact that the Stormwater Contact has not taken corrective action is of concern.

8) Minimum Control Measure 2, Public Involvement/Participation, #3, contact info "Other" indicates Annual Report is available from the Town Clerk.

However, contact info contains an inaccurate telephone number for the Town Clerk as (845) 485-3720 is a fax number for the former St. Francis Hospital in Poughkeepsie.

9) Minimum Control Measure 2, Public Involvement/Participation, #7F, summary of activities planned to meet the goals of this MCM during the next reporting cycle states that an "implementation schedule" must be included yet, year after year, this requirement is ignored.

Yet again, as in prior years, no specific implementation schedule was included. The required schedule must be provided.

10) Minimum Control Measure 3, Illicit Discharge Detection and Elimination, #12A, summary of measurable goal in the reporting period does not state that a town-wide training session for all staff occurred even

though there was a Measurable Goal in #12A of the prior year's Annual Report that such a session would be held before February 2015.

So, a goal for Illicit Discharge Detection and Elimination that was to be met for the 2014-2015 report period was not met.

11) Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, #2 and #3 are in regard to SWPPP procedures and SWPPP reviews. It is stated there is a procedure and that SWPPP reviews take place. However, the Town does not always ensure that the approved SWPPP is followed.

Just one example is the Poughkeepsie Day School Field Expansion project that had a SWPPP addendum entitled "Infiltration Trench Site Plan" revised by Chazen Engineering in order to remediate ponding of surface runoff due to excavation and vegetation removal that took place outside the project's approved area of disturbance.

The SWPPP addendum included planting notes. However, in spite of my repeated requests to the Town Board, Planning and Engineering Departments that the SWPPP be adhered to, plantings were never done and a Notice of Termination was issued during the 2014-2015 report period.

A FOIL request filed by me with the Town for records relating to the decision of town employee or consultant that the SWPPP did not have to be followed was met with the official response of "*a diligent review of Planning and Engineering records failed to turn up the requested document(s).*"

While the Town, as an MS4, may have a SWPPP review plan in place, that does not mean that SWPPPs are being adhered to.

12) Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, #6, is in regard to identification of enforcement actions against construction sites during the reporting period.

For the category of "Stop Work Orders", the number of actions is stated as "3" with an "*" noting these were "***Verbal Notices**".

Town Code 68-19 entitled "*Stop-work orders*" states that Stop-work orders shall "Be in writing".

Therefore, the fact that notices were verbal only, in effect, means that no "Stop Work Orders" were issued during the report period.

For the category of "Notices of Violations", the number of actions is stated as "5" with an "*" noting these were "*Verbal Notices:".

Town Code 133 "*Stormwater Management, Enforcement; penalties for offenses*" references compliance by "written notice of violation to the responsible person".

What the Town is reporting as Stop Work Orders and Notices of Violations are nothing more than unenforceable notifications that limit the town's ability to ensure compliance with Stormwater Management regulations.

13) Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control

Monthly inspection reports prepared by Town Engineering consultant Morris Associates and the Town Engineering Department often documented issues that went uncorrected from one report to the next.

The Town should be taking action and resolving issues in a timely manner in order to ensure compliance with regulations.

For one example, during the reporting period, the Boardman Road Branch Library engineering firm, Chazen Engineering, repeatedly did not submit monthly reports to the Town as required. The Town Engineering Department noted in December 2014 that the project's October and November reports had just been received from Chazen and that Chazen "continues to fail to meet that obligation". In February, it was noted that Chazen had not submitted the January report. However, no enforcement action was taken.

Another example in the reporting period was the Stieffel Tree Removal project where, month after month, the Town Engineering Department report stated that Town officials should require the the owner to "remove the erosion controls".

Again, the Town should be taking action and resolving issues in a timely manner in order to ensure compliance with Federal, State and local regulations.

14) Minimum Control Measure 4, Construction Site Stormwater Runoff Control, #3 and #4, state that 100% of active construction sites were inspected and 100% of active construction sites were inspected more than once during the reporting period.

The Town is lax on enforcement of such controls even though monthly inspections are done on active sites by the Town.

An example for just one project, during the reporting period, I had to request that the NYSDEC monitor conditions at the Wegmans/Emeritus site on Boardman/Spackenkill Roads due to uncorrected violations such as lack of adherence to "Stabilized Construction Entrance" and "Erosion and Sediment Control Notes" on the final approved site plan.

In response, the NYSDEC inspected on at least two occasions I am aware of and noted deficiencies and corrections including, but not limited to, the following:

Swale, check dams and sediment traps must be installed per SWPPP; Silt fence in need of repair; Construction entrance/tracking pad needing maintenance; Catch Basins Inlet Protection needed to be provided; Sediment traps/basins needing proper maintenance as trap on main road was clogged.

The Town, as the responsible MS4, should be insuring compliance especially since they are listing a Measurable Goal as "Continue to inspect and enforce erosion control measures".

15) Minimum Control Measure 4, Construction Site Stormwater Runoff Control, #7F, states a Measurable Goal as "Continue to inspect and enforce erosion control measures".

This was also a Measurable Goal in the prior year's Annual Report.

So, a goal to be met for this MCM for the 2014-2015 report period was not

met based on examples given in above comments.

16) Minimum Control Measure 5, Post-Construction Stormwater Management, #3, notes implementation of Low Impact Development/Better Site Design/Green Infrastructure principles.

As noted in prior years, these techniques are only effective if properly implemented yet lack of implementation continues.

For example, planting of rain gardens to provide on-site treatment of stormwater runoff is a critical function of these bio-retention areas yet it appears that a number of projects in the Town never completed the required rain garden plantings.

In addition, lack of required plantings as outlined in Comment #12 above also shows lack of implementation.

17) Minimum Control Measure 6, Stormwater Management for Municipal Operations, #7F, summary of stormwater activities planned to meet goals during the next reporting cycle states that an "implementation schedule" must be included yet, year after year, this requirement is ignored.

However, no specific implementation schedule was included. The required schedule must be provided.

Doreen A. Tignanelli
29 Colburn Drive
Poughkeepsie NY 12603

cc: Eric Hollman, Town Stormwater Contact
Poughkeepsie Town Board Members
Poughkeepsie Town Clerk Felicia Salvatore

(sent electronically)

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) 790-4748

MEMORANDUM

DATE: 5/28/15

To: Todd Tancredi, Town Supervisor
From: Sean Crimmins, Assistant Town Engineer
Subject: Response to public comments on the 2014-2015 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 6th to May 15th, 2015 as per a Town Board decision on April 15th, 2015. The report was made available to the public on the Town's website on May 1st, 2015.

A set of written comments were received on May 15th, 2015 from Doreen Tignanelli. Each comment is reprinted below in its entirety and is followed by a response from the Town Engineering Department:

1) COMMENT: Minimum Control Measure 1, Public Education and Outreach, #3, Public Events/Presentations, lists #Attendees as 1,961 which is eight times more than the 237 attendees listed in the prior year's Annual Report. The amount of the increase seems questionable particularly since it is stated in #4B that attendance at presentations is "generally consistent with previous reporting periods."

RESPONSE: This amount was summarized by number of the attendance to the Southeast NY Stormwater Conference, distributions at the Adams Fairacre Farm Spring Fair, distributions at the Dutchess County Fair, the number of attendance to the Green Infrastructure Conference and number in attendance to Casperkill Watershed Alliance table at the Arlington Street Fair. The increase is attributable to large events that were not quantified in the prior year.

The statement "generally consistent with previous reporting periods" was intended to indicate that the observations of the goals were equal to or better than the previous reporting periods.

2) COMMENT: *2) Minimum Control Measure 1, Public Education and Outreach, #3, "Web Page", states that specific web addresses must be provided.*

Web Page URL <http://www.dec.ny.gov/chemical/8468.htm> produces an error message stating "NYS Department of Environmental Conservation Missing Page"

Web Page URL http://dutchessswcd.org/?page_id=202 provides outdated Town of Poughkeepsie information as the link on this Dutchess County Soil and Water Conservation District page points to the 2012-2013 Annual Report for the Town and, furthermore, it is only the Draft Annual Report and not even the final 2012-2013 Annual Report.

RESPONSE: The first URL address omitted the final "l" and has been corrected to read <http://www.dec.ny.gov/chemical/8468.html>.

The URL address http://dutchessswcd.org/?page_id=202 is the link to the Dutchess County Soil and Water Conservation District webpage on "Stormwater/MS4" with links to municipal reports. The Town does not maintain that website, but a note will be sent to their technical support to request an updated link for the Town of Poughkeepsie.

3) COMMENT: *Minimum Control Measure 1, Public Education and Outreach, Evaluating Progress Toward Measurable Goals MCM 1, #4A, summary of Measurable Goal identified in the SWMPP in this reporting period states "-Complete billboard campaign" for 2014-2015 year.*

Town of Poughkeepsie Zoning Code 210-122 specifically prohibits billboard signs so it is not clear how this is considered progress toward measurable goals for the Town of Poughkeepsie.

RESPONSE: The Dutchess County MS4 committee, in which the Town of Poughkeepsie is an active participant, did not erect new billboard signs. The Committee utilized an existing legal billboard on a State Highway as an effective platform to display stormwater pollution prevention educational advertisements to the general public.

4) COMMENT: *Minimum Control Measure 1, Public Education and Outreach, Evaluating Progress Toward Measurable Goals MCM 1, #4F, summary of stormwater activities planned to meet the goals of this MCM during the next reporting cycle states that an "implementation schedule" must be included yet, year after year, this requirement is ignored.*

However, no specific schedule was included.

The required implementation schedule must be provided.

RESPONSE: The Town of Poughkeepsie achieves the majority of the MCM 1 goals by its active participation in the Dutchess County MS4 Committee. The specific goals for the

2015-2016 reporting year of the MS4 committee have been added to the summary for #4F. These action items are addressed at each monthly meeting therefore the implementation schedule is ongoing and evolving.

5) COMMENT: *Minimum Control Measure 2, Public Involvement/Participation, opportunities for public participation, #1, Community Meetings" quantifies #Attendees as 260, up from only 10 Attendees in the prior year. Again, the amount of the increase seems questionable particularly since it is stated in the report that public attendance has been "generally consistent with previous reporting periods."*

RESPONSE: This amount was summarized by number in the attendance at the MS4 Annual Report Public Hearing and at Planning Board public hearings on SWPPPs and Stormwater BMP's during site plan reviews.

The statement "generally consistent with previous reporting periods" was intended to indicate that the observations of the goals were equal to or better than the previous reporting periods.

6) COMMENT: *Minimum Control Measure 2, Public Involvement/Participation, opportunities for public participation, #1, Stakeholder Meetings" quantifies #Attendees as 279, up from only 17 Attendees in the prior year. Again, this huge increase seems questionable particularly since it is stated in the report that public attendance has been "generally consistent with previous reporting periods."*

RESPONSE: This amount was summarized by number in the attendance to the monthly DC MS4 committee meetings, the Casperkill Watershed Alliance meetings and the Wappinger Creek Intermunicipal Council meetings. The increase is attributable to meeting attendance not quantified in the prior year.

As noted before, the statement "generally consistent with previous reporting periods" was intended to indicate that the observations of the goals were equal to or better than the previous reporting periods.

7) COMMENT: *Minimum Control Measure 2, Public Involvement/Participation #2, regarding public notice of availability of annual report, it is stated that report availability was publicized via "List-Serve" numbering "116".*

The Town's Stormwater Public Contact is either inadvertently or intentionally misrepresenting this Minimum Control Measure which calls into question the integrity of data in the rest of the report.

While I received list-serve notices regarding education during the report period ending March 2015, yet again, I did not receive notification of the availability of the draft Annual Report through the list-serve run by the Town's Stormwater Public Contact Eric Hollman.

This same situation occurred for the report periods ending March 2013 and March 2014 and the town's response to my comment then was "as noted".

The fact that the Stormwater Contact has not taken corrective action is of concern.

RESPONSE: There are 116 persons within the "List-Serve" that are sent public announcements and information pertaining to stormwater related items.

Availability of the Annual Report was identified in the Town Board Agenda, Decision Agenda and "What's New" links on the Town Website. The Annual Report document was posted on the Town's website commencing on the first Friday of May in 2013, 2014 and 2015. The annual report for next year's period is expected to be posted on the same date.

8) COMMENT: *Minimum Control Measure 2, Public Involvement/Participation, #3, contact info "Other" indicates Annual Report is available from the Town Clerk.*

However, contact info contains an inaccurate telephone number for the Town Clerk as (845) 485-3720 is a fax number for the former St. Francis Hospital in Poughkeepsie.

RESPONSE: The contact number has been revised to the correct one.

9) COMMENT: *Minimum Control Measure 2, Public Involvement/Participation, #7F, summary of activities planned to meet the goals of this MCM during the next reporting cycle states that an "implementation schedule" must be included yet, year after year, this requirement is ignored.*

Yet again, as in prior years, no specific implementation schedule was included. The required schedule must be provided.

RESPONSE: As in the previous response pertaining to an implementation schedule, the goals of the Dutchess County MS4 committee are action items that are addressed at each monthly meeting therefore the implementation schedule is ongoing and evolving. Information to be updated on the Town's website pertaining to the MS4 is also ongoing and is posted as the information becomes available, therefore no foreseeable implementation schedule is possible.

10) COMMENT: *Minimum Control Measure 3, Illicit Discharge Detection and Elimination, #12A, summary of measurable goal in the reporting period does not state that a town-wide training session for all staff occurred even though there was a Measurable Goal in #12A of the prior year's Annual Report that such a session would be held before February 2015.*

So, a goal for Illicit Discharge Detection and Elimination that was to be met for the 2014-2015 report period was not met.

RESPONSE: Scheduling conflicts and inclement weather conditions hindered a Town wide training session before February 2015. All staff in relevant positions were therefore trained per department, but the last session occurred after the reporting period ended. The

remainder of the staff trained after the period ended will be indicated on the Annual Report for next year's summary.

11) COMMENT: *Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, #2 and #3 are in regard to SWPPP procedures and SWPPP reviews. It is stated there is a procedure and that SWPPP reviews take place. However, the Town does not always ensure that the approved SWPPP is followed.*

Just one example is the Poughkeepsie Day School Field Expansion project that had a SWPPP addendum entitled "Infiltration Trench Site Plan" revised by Chazen Engineering in order to remediate ponding of surface runoff due to excavation and vegetation removal that took place outside the project's approved area of disturbance.

The SWPPP addendum included planting notes. However, in spite of my repeated requests to the Town Board, Planning and Engineering Departments that the SWPPP be adhered to, plantings were never done and a Notice of Termination was issued during the 2014-2015 report period.

A FOIL request filed by me with the Town for records relating to the decision of town employee or consultant that the SWPPP did not have to be followed was met with the official response of "a diligent review of Planning and Engineering records failed to turn up the requested document (s). "

While the Town, as an MS4, may have a SWPPP review plan in place, that does not mean that SWPPPs are being adhered to.

RESPONSE: The overall mechanism for SWPPP review and implementation is in place and has been effective for many projects, inclusive of requirements for regular inspections, interim and final reporting by qualified persons or licensed professionals.

12) COMMENT: *Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control, #6, is in regard to identification of enforcement actions against construction sites during the reporting period.*

For the category of "Stop Work Orders", the number of actions is stated as "3" with an "" noting these were "*Verbal Notices:".*

Town Code 68-19 entitled "Stop-work orders" states that Stop-work orders shall "Be in writing".

Therefore, the fact that notices were verbal only, in effect, means that no "Stop Work Orders" were issued during the report period.

For the category of "Notices of Violations", the number of actions is stated as "5" with an "" noting these were "*Verbal Notices:".*

Town Code 133 "Stormwater Management", Enforcement; penalties for offenses" references compliance by "written notice of violation to the responsible person".

What the Town is reporting as Stop Work Orders and Notices of Violations are nothing more than unenforceable notifications that limit the town's ability to ensure compliance with Stormwater Management regulations.

RESPONSE: The eight verbal notices have been moved to the "Other" enforcement action category with an asterisks indicating the nature of the notice. Follow up actions and/or monitoring resulted in compliance, therefore written notices were unnecessary.

13) COMMENT: Minimum Control Measures 4 and 5, Construction Site and Post-Construction Control

Monthly inspection reports prepared by Town Engineering consultant Morris Associates and the Town Engineering Department often documented issues that went uncorrected from one report to the next.

The Town should be taking action and resolving issues in a timely manner in order to ensure compliance with regulations.

For one example, during the reporting period, the Boardman Road Branch Library engineering firm, Chazen Engineering, repeatedly did not submit monthly reports to the Town as required. The Town Engineering Department noted in December 2014 that the project's October and November reports had just been received from Chazen and that Chazen "continues to fail to meet that obligation". In February, it was noted that Chazen had not submitted the January report. However, no enforcement action was taken.

Another example in the reporting period was the Stieffel Tree Removal project where, month after month, the Town Engineering Department report stated that Town officials should require the the owner to "remove the erosion controls".

Again, the Town should be taking action and resolving issues in a timely manner in order to ensure compliance with Federal, State and local regulations.

RESPONSE: The vast majority of documented issues are corrected. Uncorrected issues are typically administrative and/or do not involve substantial risk to off site impact.

14) COMMENT: Minimum Control Measure 4, Construction Site Stormwater Runoff Control, #3 and #4, state that 100% of active construction sites were inspected and 100% of active construction sites were inspected more than once during the reporting period.

The Town is lax on enforcement of such controls even though monthly inspections are done on active sites by the Town.

An example for just one project, during the reporting period, I had to request that the NYSDEC monitor conditions at the Wegmans/Emeritus site on Boardman/Spackenkill

Roads due to uncorrected violations such as lack of adherence to "Stabilized Construction Entrance" and "Erosion and Sediment Control Notes" on the final approved site plan.

In response, the NYSDEC inspected on at least two occasions I am aware of and noted deficiencies and corrections including, but not limited to, the following:

Swale, check dams and sediment traps must be installed per SWPPP; Silt fence in need of repair; Construction entrance/tracking pad needing maintenance; Catch Basins Inlet Protection needed to be provided; Sediment traps/basins needing proper maintenance as trap on main road was clogged.

The Town, as the responsible MS4, should be insuring compliance especially since they are listing a Measurable Goal as "Continue to inspect and enforce erosion control measures".

RESPONSE: The issues with Wegmans/Emeritus site were remedied. Items requiring corrective action per field inspections are expedited by the cooperation of the contractors. In instances where cooperation is abrasive, enforcement actions are required. Verbal notices sufficient in this reporting year.

15) COMMENT: *Minimum Control Measure 4, Construction Site Stormwater Runoff Control, #7F, states a Measurable Goal as "Continue to inspect and enforce erosion control measures".*

This was also a Measurable Goal in the prior year's Annual Report.

So, a goal to be met for this MCM for the 2014-2015 report period was not met based on examples given in above comments.

RESPONSE: The vast majority of erosion control measures on construction sites in this reporting period were implemented or corrected as required. Considering the number of projects requiring SWPPPs that are inspected and reviewed within the Town of Poughkeepsie and the compliance of most of the contractors when revisions or repairs are requested, we believe that this overall goal has been met.

16) COMMENT: *Minimum Control Measure 5, Post-Construction Stormwater Management, #3, notes implementation of Low Impact Development/Better Site Design/Green Infrastructure principles.*

As noted in prior years, these techniques are only effective if properly implemented yet lack of implementation continues.

For example, planting of rain gardens to provide on-site treatment of stormwater runoff is a critical function of these bio-retention areas yet it appears that a number of projects in the Town never completed the required rain garden plantings.

In addition, lack of required plantings as outlined in Comment #12 above also shows lack of implementation.

RESPONSE: Many rain garden BMP's that are included in subdivision infrastructure plans are constructed at later times and during different phases of the project. In some instances, the development of the individual lots would trigger the construction of the rain garden. We are unaware of any rain gardens that were not completed to full design per plan.

17) COMMENT: Minimum Control Measure 6, Stormwater Management for Municipal Operations, #7F, summary of stormwater activities planned to meet goals during the next reporting cycle states that an "implementation schedule" must be included yet, year after year, this requirement is ignored.

However, no specific implementation schedule was included. The required schedule must be provided.

RESPONSE: IDDE training is required every three years of all staff in relevant positions according to the Town's SWMP and that training has already taken place. The individual Town departments require their staff to review the Municipal Operations and Good Housekeeping materials and undergo erosion control training on an annual basis, therefore the implementation schedule is an annual basis as indicated by the response for #7F.