


**MEMORANDUM**

TO: Lewisboro Town Board

FROM: Joseph M. Cermele, P.E., CFM   
Kellard Sessions Consulting, P.C.  
Consulting Town Engineers

DATE: May 5, 2016

RE: NYSDEC MS4 Annual Report – 2016  
NYSDEC SPDES ID NYR2OA227  
Reporting Period Ending March 9, 2016

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At the request of the Town Board and as required by the New York State Department of Environmental Conservation (NYSDEC), Kellard Sessions Consulting, P.C. has prepared the “MS4 Annual Report” for the reporting year of March 10, 2015 through March 9, 2016. The Report is necessary to maintain continued coverage under the Town’s Notice of Intent (NOI) with the State for discharge of stormwater runoff to waters of the State and for compliance with the NYSDEC SPDES General Permit, GP-0-15-003, for Stormwater Discharge from MS4’s (Municipal Separate Storm Sewer Systems). The Report must be filed with the State no later than June 1, 2016 of the reporting year. It is the purpose of this memo to provide an aid in summarizing the findings presented in the Town’s MS4 Annual Report.

Pursuant to Section 402 of the Clean Water Act (CWA), operators of small municipal separate storm sewer systems (MS4s), located in urbanized areas (UA) and those additionally designated by New York State are unlawful unless they are authorized by a National Pollutant Discharge Elimination System (NPDES) Permit or by a State Permit Program. New York’s State Pollutant Discharge Elimination System (SPDES) is an NPDES-approved program with permits issued in accordance with the Environmental Conservation Law (ECL). Only those small MS4 operators, such as the Town of Lewisboro, who develop and implement a stormwater management program (SWMP) and obtain permit coverage in accordance with Part II of the SPDES General Permit are authorized to discharge stormwater from their small MS4 under the SPDES General Permit. The Town of Lewisboro is currently authorized under GP-0-15-003 and shall be permitted to continue to discharge in accordance with the Permit, which expires April 30, 2017, upon the submission of the Annual Report.

The MS4 Annual Report has been prepared for the 2015-2016 reporting year (March 10, 2015 through March 9, 2016). The Annual Report must be filed with the NYSDEC no later than June 1, 2016. Part VII, A, 2, d of the General Permit requires that the draft Annual Report be presented to the public with an opportunity to provide comment prior to the June 1 filing deadline in one of two ways:

- At a meeting, open to the public, where the public is able to ask questions or make comments on the draft Report; or
- On the internet by providing access to the draft Report via the Town website and providing the public the opportunity to provide comment by sending them via email to [townclerk@lewisborogov.com](mailto:townclerk@lewisborogov.com); and providing the opportunity for a public meeting if requested by 2 or more people.

This requirement is being satisfied by the Town by announcing the availability of the draft Report at the public meeting of the Town Board held on May 9, 2016 at 7:30 p.m.

The draft report is available for viewing on the Town website at the following link:

<http://www.lewisborogov.com/smc>

Any comments on the draft Report may be sent via email to [townclerk@lewisborogov.com](mailto:townclerk@lewisborogov.com). A summary of any comments received and intended responses will be filed with the Annual Report. If no requests for a public meeting are received, the draft Report will be finalized and signed by the Town Supervisor, Mr. Peter Parsons, and filed with the State no later than June 1, 2016.

As noted previously, the Annual Report is required to maintain continued coverage under the Town's NOI and for compliance with NYSDEC SPDES GP-0-15-003, which expires on April 30, 2017.

The Town of Lewisboro is located within seven (7) sub-watershed basins. Five (5) basins are within the NYC Watershed, a phosphorous restricted watershed, with heightened stormwater requirements and account for approximately 75% of the land within the municipal bounds. These are:

- Croton River East Basin
- Titicus River Basin
- Waccabuc River Basin
- Cross River Basin
- Cross River East Basin

Two (2) basins are located outside of the NYC Watershed and include:

- Mill River Basin
- Silvermine River Basin

The division of the Watershed Areas is illustrated on the attached figure entitled “Watershed Area Map – Town of Lewisboro”.

The General Permit requires that a covered entity develop and implement a stormwater management plan that satisfies the requirements for each of six required program components, known as Minimum Control Measures (MCMs). The six MCMs are listed below with brief summaries of methods of compliance and planned activities which are further detailed in the Annual Report.

MCM 1 - Public Education & Outreach

- ▶ Information is targeted to specific audiences based on Town's make-up and various uses.
- ▶ Outlines methods used by the Town to achieve education and outreach to the public with stormwater related issues (e.g., direct mailings, printed materials, kiosks, website, newspaper ads/articles, public events, TV programs, Town meetings and Stormwater Committee newsletters).

MCM 2 - Public Involvement/Participation

- ▶ The Town provides opportunity for public involvement such as at public meetings, community meetings and clean-up events.
- ▶ The Town presents this annual report and makes it available to the public.
- ▶ The Town's continued partnership with the East of Hudson Watershed Corporation (EOHWC) in its efforts to provide regional stormwater watershed improvements.
- ▶ The Town continues to conduct semi-monthly Stormwater Committee meetings.

MCM 3 - Illicit Discharge Detection & Elimination (IDDE)

- ▶ The Town's Storm System Mapping is 100% complete (outfalls and conveyances) Town-wide with 20% of outfalls re-inspected annually and reported on standardized Outfall Reconnaissance Inspection Forms.
- ▶ GIS Mapping is used to help track IDDE and find its source for elimination.
- ▶ Town continues to require septic inspections at a minimum frequency of once every years for all residents with the first 5-year period ending May 2016.
- ▶ Town continues to train employees regarding IDDE and stormwater management.

MCM 4 - Construction Site Stormwater Runoff Control

- ▶ Town continues to enforce a local ordinance requiring the preparation of SWPPPs for proposed developments for review by the Town Consulting Engineer in accordance with the NYS Stormwater Management Design Manual.
- ▶ Town continues to conduct site inspections for all projects under construction.
- ▶ The Town has the ability to issue violations (total of 3) or stop work orders (total of 3) as deemed necessary and require corrective action.

MCM 5 - Post-Construction Stormwater Management

- ▶ Provides a method to track Town progress with installation, inspection and maintenance of their stormwater best management practices (BMPs).
- ▶ The Town has a continued partnership with EOHWC to pursue regional watershed stormwater retrofit projects.
- ▶ Town has completed construction of the Mead Street Stormwater Retrofit Project.
- ▶ Town will begin to inventory local stormwater BMPs.

MCM 6 - Stormwater Management for Municipal Operations

- ▶ Identifies municipal operations that could potentially contribute to polluting watershed (i.e., street sweeping, salt storage, vehicle maintenance, parks).
- ▶ Quantifies housekeeping efforts such as street sweeping, catch basin cleaning/inspection, etc.
- ▶ Town continues to train municipal employees.
- ▶ Update the Town Stormwater Management Plan as necessary.
- ▶ Town performs annual inspections of all Town facilities (Town Park, Town House Complex, Salt Dome, Onatru Farm).
- ▶ Town has purchased a vacuum truck to facilitate routine maintenance of stormwater conveyances and management practices.

Upon acceptance of the MS4 Annual Report, it will be signed by Supervisor Peter Parsons and filed with the State no later than June 1, 2016.

JMC/dc