

The Storm Water Management Program (SWMP) and Best Management Practices (BMP) Report Some Explanatory Notes

***Prepared by N. Heinzen, Coalition Stormwater Program Coordinator
December 19, 2014***

1. The City of Albany SWMP Plan, as well as the Town of Colonie SWMP Plan is a product of MS4Web Permit Manager, a software package developed by CBI, Ltd and purchased by the Coalition in 2010. Data entry format is prescribed by the software, but the content itself can be variable. Each of these individual SWMP Plans is a subset of the larger, Joint Coalition SWMP Plan.

2. The MS4Web software splits the Storm Water Management Program document into two "Reports". The first report titled Storm Water Management Program (SWMP) states what the MS4 intends to do by a certain date. It includes all the Tasks, Measurable Goals, and Implementation Dates associated with the program plan organized by minimum control measures (MCMs) and best management practices (BMPs). It does not describe accomplishments, just what is intended. The second Report is the BMP Report, which describes which of the named Tasks and Goals have been accomplished; shows where supporting documentation is available, and includes written commentary about what may or may not have happened and why.

These two documents, the Storm Water Management Program and BMP Report together represent the SWMP Plan (SWMP) and the SWMP Update (BMP Report). The BMP Report submitted as part of the City of Albany EPA Audit, by agreement with Coalition members, notes not only Tasks and Goals implemented by the City of Albany, but also Tasks and Goals implemented by all the Coalition members. There are various reasons for this, largely related to time, staffing and some unanticipated software realities.

Typically, a careful analysis of Tasks/Goals accomplished results in a revision to the planning documents. While revisions are easy to execute using the software, the process of updating a SWMP Plan requires some care and attention, therefore, before hastily fiddling with the software, the intent of Coalition members is to instead mention these changes in the text of the BMP Report and use the next Annual Reporting cycle to delete BMPS or drop and change Goals, etc. The timing of these changes also fits with the named end date of many SWMP Goals, 3/9/2015, also the expiration date of the current MS4 Permit.

3. Confusing for readers is the difference between Implementation Tasks and Measurable Goals. Implementation Tasks are generic descriptions intended to make explicit specific requirements named in the MS4 Permit. While they may repeat year-to-year, each yearly set is matched to a particular Implementation Date, which is typically the end of the Reporting Year, March 9. They are not specific to a particular MS4/Coalition member; instead they are tasks which apply to all MS4s.

Measurable Goals are intended to summarize what would result if all of the named annual tasks were completed on schedule. They tend to be cumulative goals representing the total number of events

occurring over a particular time frame, generally from 2012/2013 to 2015. They are either specific to the Coalition or specific to a particular MS4/Coalition member.

4. All Measurable Goals reflect individual decisions made by an MS4/Coalition member dating back to 2012/2013 when the SWMP Plan document was developed by the Coalition. Creation of the SWMP took place over 7 months and involved multiple meetings. They are typically conservative and thought to be attainable to the maximum extent practicable. In some cases, they try to capture how municipalities function and while conceptually similar to data requested in the MS4 Permit Annual Report, may be different. Reconciling the two data points, can be confusing and is explained in the BMP Report, as needed.

5. Data entered for the BMP Report, comes from a variety of sources, such as MS4 Permit Annual Reports; municipal records, spreadsheets, presence/absence observations.

6. While there is no Minimum Control Measure 7 in the MS4 Permit, Coalition members decided to add a minimum measure which intentionally called out key administrative tasks necessary to develop and sustain a Stormwater Management Program.

7. AR2010 refers to the Annual Reporting year from 3/10/2009 to 3/9/2010. A similar reporting year time frame applies to AR2011, reporting year ending 3/9/2011; AR2012, reporting year ending 3/9/2012, etc.

8. For those repeating Implementation Tasks grouped by year, if the Task was clearly implemented within a certain reporting year, it is checked off as implemented. In some cases, given the wording of the Task or the fact that some MS4/municipalities may or may not have completed the Task, it is not checked off. Explanations regarding why the Task may or may not have been implemented are included in the last set of Tasks associated with this current reporting year, often with an implementation date of 3/9/2015.