



CITY OF MOUNT VERNON, N.Y.

DEPARTMENT of PUBLIC WORKS

SHAWYN PATTERSON-HOWARD
Mayor

City Hall, One Roosevelt Square
Mount Vernon, NY. 10550
(914) 914-665-2343
email:dpwconcerns@mountvernonny.gov

DAMANI L. BUSH
Commissioner

JOHN NUCULOVIC
Deputy Commissioner

01 April 2025

Honorable City Council Members
The City of Mount Vernon
Mount Vernon, New York
(Through the Office of the Mayor)

Re: Request for Internal Training of Qualified/Proven Staff Regarding a Spread Spectrum of Stormwater/Sewer State Mandates and Federal Consent Decree Actions

Dear Honorable City Council Members,

1. **ISSUE.** Esteemed Council Members, I hope this correspondence finds you well. Stormwater management, pollution prevention, MS-4 [Municipal Separate Storm Sewer Systems] mandates, and the requisite actions under the Federal Consent Degree all have taxing responsibilities and requirements which require formulation, documentation and implementation of plans. I am writing to propose sending three senior members of our team to New York State Certified training, rather than outsourcing the required expertise for needs. Given the current challenges we are facing in hiring a qualified stormwater coordinator and/or civil engineer to fulfill these roles, I believe investing in the training of our existing staff is the most viable and cost-effective solution.

I firmly and wholeheartedly recommend this course of action upon five foundations: (1) hiring challenges; (2) cost savings; (3) internal expertise and knowledge retention; (4) task distribution and efficiency; (5) long-term benefits for the department.

As you may be aware, it has been disheartening and difficult to locate and interview a civil engineer with the necessary expertise in MS-4 regulations, as well, outsourcing the work to external consultants or contractors would prove both costly and inefficient, particularly when we can build internal capacity through training our current team members. By training our senior personnel, we can avoid these recurring fees and reduce our reliance on external consultants. This investment in professional development not only provides us with a relatively low-cost expense for training but also empowers our team to manage the stormwater program independently moving forward, leading to long-term cost savings.

In addition, the proposed course of action ensures that the knowledge gained stays within the organization. This training will equip our Engineering Division and Management Division with the necessary skills to manage stormwater compliance, plan maintenance, and implement best practices, which are all essential.

Furthermore, it will allow us to have a team that is directly aligned with our organization's specific needs and goals, state mandates, and federal consent decrees. By building internal expertise, we are ensuring that we can continue to meet regulatory requirements without the need for constant external intervention, while fostering a more resilient and responsive department, better prepared for future challenges and changes in regulations.

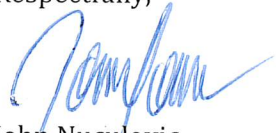
2. **SOLUTION.** We propose that the Commissioner of Public Works [D. Bush], the Deputy Commissioner [J. Nuculovic], and our lead operational sewer staff [A. Montero], be afforded the opportunity to serve Mount Vernon with the certification of **New York QPSWPPP+ Program** [*Qualified Preparer of Stormwater Pollution Prevention Plans - Advanced*]. In addition, Mr. Montero would take the **Minor Courses Bundle** encompassing: (1) Public Education and Outreach; (2) Public Participation/Involvement; (3) Illicit Discharge Detection and Elimination; (4) Construction Site Runoff Control; (5) Post-Construction Runoff Control (6) Pollution Prevention/Good Housekeeping.

3. **COST.** The StormwaterOne CP2000B QPSWPPP cost would total 3,672.00USD (1,224.00 per certification) and the MS299 Bundle is 624.00USD (only one purchase).

The total cost for this course of action is **4,296.00USD** and the budget code that would be employed is **Education/Training [A1490.417]**.

Thank you for your consideration in this important matter.

Respectfully,



John Nuculovic
Deputy Commissioner of Public Works

Cc: (1) File
Enclosures: (1) StormwaterOne CP2000B QPSWPPP Synopsis
(2) StormwaterOne MS299 Bundle Synopsis