City of Westwood Hills, Kansas

Stormwater Management Plan

Submitted in Compliance with Kansas Permit No.: M-MO39-SU01

Date: September 14, 2015
# TABLE OF CONTENTS

## Section 1 Introduction/Background

1.1 Introduction ................................................................. 1-1
1.2 Overview of Stormwater Permit Requirements for MS4s .......... 1-1

## Section 2 Parties Responsible for Compliance with this Plan

## Section 3 Six Minimum Controls

3.1 Public Education and Outreach ........................................ 3-1
3.2 Public Involvement and Participation ............................... 3-4
3.3 Illicit Discharge Detection and Elimination ...................... 3-6
3.4 Construction Site Stormwater Runoff Control ................. 3-8
3.5 Post-Construction Stormwater Management in New Development and Redevelopment ........................................... 3-10
3.6 Pollution Prevention/Good Housekeeping for Municipal Operations .......... 3-12

## Section 4 Total Maximum Daily Load (TMDL) Regulated Pollutants

## Section 5 Monitoring

## Section 6 Permit Compliance Schedule and Annual Reporting

## Section 7 Modifications to BMPs or this Plan

### Attachments

- Map Attachment 1 – Westwood Hills Storm Sewer Network
- Map Attachment 2 – Stream Map
1.1 INTRODUCTION

This document is a Stormwater Management Plan (SMP, or the “Plan”) created to help reduce the discharge of pollutants in stormwater runoff within regulated areas of Westwood Hills, Kansas. It outlines stormwater program activities, monitoring requirements, reporting requirements, and responsible parties for implementing this work.

This plan was prepared in compliance with Kansas Permit Number: M-MO39-SU01

  Effective Date of Permit: January 1, 2015
  Expiration Date: December 31, 2019

Section 1.2 summarizes the basic requirements of the stormwater permitting program for the benefit of users of this document. Subsequent sections provide the details of the SMP itself.

1.2 OVERVIEW OF STORMWATER PERMIT REQUIREMENTS FOR MS4s

The Federal Water Pollution Control Act (also referred to as the Clean Water Act) requires permits of both municipal and industrial stormwater dischargers, developed under a program called the National Pollutant Discharge Elimination System (NPDES). Permits for stormwater discharges from municipal urbanized areas are regulated under the MS4 permitting program. The term MS4 is short for Municipal Separate Storm Sewer Systems. (These are urbanized areas that have stormwater drainage systems that are separate from sanitary sewer systems.)

The Kansas Department of Health and Environment (KDHE) has developed two general MS4 permits for small municipalities with separate storm sewer systems. One was written for entities receiving an MS4 permit for the first time and another written for entities receiving a re-issued permit.

The general permits establish standardized requirements for entities across the state engaged in similar activities and discharging stormwater of similar quality. Permits issued to regulated cities or counties may include added conditions in addition to the standardized requirements in the general permits. The following description of the MS4 permit program was compiled from KDHE fact sheets:

The small MS4 general permit program addresses MS4s that generally serve populations less than 100,000 in urbanized areas, plus those MS4s located outside of urbanized areas that have or may have the potential to negatively impact surface water quality as a result of their discharges.

A general permit requires the permittee to develop, implement, and enforce a Stormwater Management Plan (SMP) designed to reduce the discharge of pollutants from the MS4 to the maximum extent practical, to protect water quality, and to satisfy water quality requirements of the Clean Water Act and Kansas law.

The SMP must include six minimum stormwater control measures that are required of all plans. It is also required to address implementation of Best Management Practices (BMPs) for reducing pollutants in stormwater discharges from the municipality. Special emphasis is placed on drainage basins and stormwater pollutants that discharge to designated Total Maximum Daily Load (TMDL) streams and lakes within or immediately downstream of the municipality.

The SMP document must address the BMPs to be implemented by the permittee, provide measurable goals for the BMPs, designate the parties responsible for implementing the control
measures, provide appropriate maps and conduct stormwater/receiving stream sampling and testing based upon the TMDL impairments.

“Impaired Waters” are streams or lakes that do not attain or maintain minimum water quality standards. They may result from individual or multiple pollutants. As noted above, TMDL is an acronym for Total Maximum Daily Load, which is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards. Impaired streams and lakes are also commonly referred to as TMDL water bodies.

TMDL water bodies and pollutants of concern are identified in permits issued for individual municipalities if impaired waters exist within or immediately downstream of that jurisdiction. Monitoring requirements and water quality protection initiatives may then focus especially on those pollutants.
The Mayor has the overall responsibility for compliance with this Plan. Implementation may include assistance from the following:

- Westwood Hills’ City Council and City Clerk
- Johnson County Stormwater Management Advisory Council (SMAC)
- City of Westwood Police Chief and the Public Works Director
- Johnson County Water Quality Specialist
- Consolidated Fire District No. 2
- Johnson County Department of Health and Environment
- Westwood Hills Community Association
- Consideration of partnering with the cities of Westwood/Fairway/Mission Hills/Mission Woods to provide or share services.
This section describes the six minimum water quality protection control measures that are required by all MS4 permits. They include the following:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

For each of these control measures the following is provided in this section:

- A summary description of the control measure
- The benefits of the control measure
- A table listing Best Management Practices (BMPs), Measurable goals for the BMPs, and Responsible parties
- Program assessment activities for evaluating the success of the control measure

3.1 CONTROL MEASURE 1 - PUBLIC EDUCATION AND OUTREACH

Description
This minimum control consists of implementing a public education program to inform individuals, businesses, and organizations about the impacts of stormwater discharges on surface water quality and how they can help reduce pollutants in stormwater runoff. This may include distribution of educational materials to the community and/or conducting outreach activities.

Benefit
An informed public increases awareness of water quality issues in both residents and businesses, creates opportunities for the public to take direct action to improve the health and sustainability of their community, and builds support for program goals making initiatives more effective.
### Public Education and Outreach

<table>
<thead>
<tr>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Develop a stormwater public education and outreach program</td>
<td>The City participates in education and outreach through partner efforts of the Johnson County Stormwater Management Program (JCSMP). Outreach efforts provided through this partnership may include partnering with schools and local non-profit organization working in Johnson County to implement stormwater education/curricula in schools and the community.</td>
<td>The program is in-place and educational and outreach programs are available to the public.</td>
<td>City of Westwood Hills with the assistance of the JCSMP Water Quality Specialists *</td>
<td>Initiate program within 1 yr of effective date of permit (Jan 1, 2016) Continue annually, subject to Johnson County Stormwater Management Advisory Council (SMAC) funding</td>
</tr>
<tr>
<td>1.2 Develop stormwater related education and outreach materials</td>
<td>The City participates in the development of education materials through partner efforts of the JCSMP. Items provided through this partnership may include articles or advertising in local newspapers, print/electronic newsletters, flyers, brochures, envelope stuffers, etc.</td>
<td>The program is in-place and educational and outreach programs are available to the public. JCSMP provides annual summaries of initiatives, events, and number of participants. Those statistics will be included with the City’s annual report.</td>
<td>City of Westwood Hills with the assistance of the JCSMP Water Quality Specialists *</td>
<td>Annual, subject to SMAC funding</td>
</tr>
<tr>
<td>1.3 Annual Program Review</td>
<td>JCSMP and Cities review and assess the program on an annual basis, and revise as required.</td>
<td>As needed, note revisions in annual report and update SMP</td>
<td>City of Westwood Hills</td>
<td>Annual</td>
</tr>
</tbody>
</table>

* Subject to funding approval by Johnson County Stormwater Management Advisory Council (SMAC) and the Board of County Commissioners (BOCC)
Program Assessment

The overall success of the Public Education and Outreach Program will be measured through the successful implementation of the components of the program. Johnson County plus the Mid-America Regional Council (MARC) Water Quality Education Committee provide annual summaries of program statistics for partner cities.

Program assessment will be reported with each annual NPDES report discussing the activities completed for the previous program year. The following will be measured:

- Number of education and outreach programs and presentations conducted, and attendance
- Number of times information is published in City newsletter
- Survey results, when conducted
### 3.2 CONTROL MEASURE 2 - PUBLIC INVOLVEMENT AND PARTICIPATION

#### Description
This minimum control consists of creating opportunities for individuals and organizations to provide public comment and recommendations regarding BMPs and measurable goals and to participate in the development and implementation of BMPs to reduce the contamination of stormwater. This program must also comply with state and local public notice requirements.

#### Benefit
The goal of the stormwater management plan is to improve water quality in local lakes and rivers, which provides benefits to the entire community. As such, the community deserves to have an opportunity to voice opinions on the content of the plan. Further, input into decisions builds support for and ownership in outcomes.

#### BMPs, Goals, and Staff

<table>
<thead>
<tr>
<th>Public Involvement and Participation</th>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Develop a Public Involvement and Participation Program, and Create a Mechanism for Public Comment and Input</td>
<td>2.1</td>
<td>Want a mechanism for public comments on the stormwater management program, the SMP, and stormwater pollution control initiatives. Input may be provided on website, at community events, or through similar means. Email address for City Clerk available for public comment/communication.</td>
<td>Program is started and a mechanism is in-place to solicit public input. Develop a mechanism to accept comments, then create a log of comments and track responses</td>
<td>JCSMP* Water Quality Specialist City of Westwood Hills**</td>
<td>Initiate program within 1 yr of effective date of permit (Jan 1, 2016) Provide public comment opportunities on an ongoing basis</td>
</tr>
<tr>
<td>2.2 Comply with Public Notice Provisions</td>
<td>2.2</td>
<td>Public comment methods will comply with State and City public notice requirements.</td>
<td>Revisions advertised, comments addressed</td>
<td>City of Westwood Hills**</td>
<td>Annual</td>
</tr>
<tr>
<td>2.3 Promote Community Involvement</td>
<td>2.3</td>
<td>The City participates in community involvement initiatives through partner efforts of the Johnson County Stormwater Management Program (JCSMP). List of stormwater related activities; summary of accomplishments; number of attendees is provided by JCSMP on an annual basis.</td>
<td></td>
<td>City of Westwood Hills**</td>
<td>Annual, subject to funding</td>
</tr>
<tr>
<td>2.4 Annual Program Review</td>
<td>2.4</td>
<td>Assess Program and revise as required</td>
<td>As needed, note revisions in annual report and update SMP</td>
<td>City of Westwood Hills **</td>
<td>Annual</td>
</tr>
</tbody>
</table>

** City of Westwood Hills denotes responsibilities delegated to Public Safety Committee Council Person and Lay Committee members appointed by the Mayor.
Program Assessment

Similar to Public Education and Outreach, the overall success of the Public Involvement and Participation Program will be measured through the successful implementation of the components of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. The following will be measured:

- Number of public notices issues and comments received
- Number of community involvement events and participants
- Number of cost-share projects and participants
3.3 CONTROL MEASURE 3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION

Description

This minimum control consists of developing, implementing, and enforcing a program to detect and eliminate illicit wastewater discharges or other non-stormwater discharges into the storm sewer system. KDHE requires this program to include, at a minimum:

- Developing a storm sewer system map of the permitted MS4 showing the location of all outfalls, either pipes or open channel drainage, and showing the names and locations of all streams or lakes that receive discharges from those outfalls.
- Enacting and enforcing an ordinance or resolutions to prohibit non-stormwater discharges into the storm sewer system.
- Informing public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- Developing and implementing a plan to detect and address prohibited non-stormwater discharges.

Benefit

Direct discharges of waste streams can present significant localized impacts to both public health and the environment. Developing legal, technical, and educational means to eliminate illicit discharges provides direct benefits to water quality, the environment, and public health.

BMPs, Goals, and Staff

<table>
<thead>
<tr>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1</td>
<td>Map of Storm Sewer System</td>
<td>Prepare a map of the City’s storm sewer system, pipes, channels, outfalls, and receiving water bodies.</td>
<td>Map is complete.</td>
<td>City of Westwood Hills*</td>
</tr>
<tr>
<td>3.2</td>
<td>Develop an Illicit Discharge Detection and Elimination program</td>
<td>Initiate a program to detect and eliminate illicit discharges incorporating the elements below.</td>
<td>Develop program, mapping is complete, and prepare and enact ordinance.</td>
<td>City of Westwood Hills*</td>
</tr>
<tr>
<td>3.3</td>
<td>Pollution Prevention Ordinance</td>
<td>Develop or update the Stormwater Pollution Ordinance and enforcement procedures as needed</td>
<td>Prepare ordinance or update (if required).</td>
<td>City of Westwood Hills*</td>
</tr>
<tr>
<td>3.4</td>
<td>Program to inform public employees, businesses, and general public</td>
<td>Incorporate information on the hazards of illegal discharges into the public education and outreach program.</td>
<td>Prepare or obtain and distribute educational materials including illicit discharge information.</td>
<td>City of Westwood Hills*</td>
</tr>
</tbody>
</table>
### SECTION THREE

**Six Minimum Control Measures**

<table>
<thead>
<tr>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Train appropriate city personnel on the hazards of illicit discharges and how to identify such illicit discharges.</td>
<td>Train appropriate staff in Planning/Codes, Facilities, Public Works, and Parks and Recreation, etc. annually on reporting pollution or conducting inspections.</td>
<td>City of Westwood Hills*</td>
<td>Annually beginning in 2017.</td>
</tr>
<tr>
<td>3.5</td>
<td>Implement a plan to detect and address illicit discharges</td>
<td>Provide a means for residents to report illicit discharges. Respond to and investigate reports of potential illicit discharges. Investigate illicit discharge complaints in the City, track the number of complaints received, and the disposition of the problem found. Forward complaints to appropriate agencies, as needed.</td>
<td>City of Westwood Hills*</td>
<td>Annually beginning in 2017.</td>
</tr>
<tr>
<td>3.6</td>
<td>Annual Program Review</td>
<td>Assess the Program and revise as required</td>
<td>As needed, note revisions in annual report and update SMP</td>
<td>City of Westwood Hills*</td>
</tr>
</tbody>
</table>

* City of Westwood Hills denotes responsibilities delegated to the Mayor, the Police Chief, the Public Safety Committee Council Person and the City Attorney.

### Program Assessment

The overall success of the Illicit Discharge Detection and Elimination Program will be measured through the successful implementation and enforcement of a Stormwater Pollution Ordinance to be prepared and enacted before January 1, 2017.

Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. The following will be measured:

- Number of public complaints addressed or problems discovered by City staff
- Number of inspections conducted
- Number of notices of violation or penalties issued
3.4 CONTROL MEASURE 4 - CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Description

This minimum control includes developing, implementing, and enforcing a program to reduce pollutants in any stormwater runoff to the MS4 for construction sites disturbing one acre or more, including areas that are less than one acre but are part of a larger common plan for development that disturbs one or more acre. KDHE requires this program to include:

- Where permittees have the authority to do so, ordinances or resolutions shall be enacted to require erosion and sediment controls, as well as sanctions to ensure compliance.
- Requirements for construction site owners or operators to implement erosion and sediment control BMPs.
- Requirements for construction site owners or operators to control wastes at the construction site that are likely to cause adverse impacts to water quality.
- Procedures for site plan review which incorporate consideration of potential water quality impacts.
- Procedures for receipt and consideration of information submitted by the public.
- Procedures for site inspection and enforcement of control measures.

Benefit

If uncontrolled, land disturbance activities can generate significant loads of sediment which can impact both adjoining properties and downstream water bodies. Fortunately, effective controls are easy and cost-effective to implement.

BMPs, Goals, and Staff

<table>
<thead>
<tr>
<th>Construction Site Stormwater Runoff Control</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>BMP</strong></td>
</tr>
<tr>
<td>4.1 Regulations and Standards</td>
</tr>
<tr>
<td>4.2 Site Plan Review (No sites greater than one acre currently platted or available)</td>
</tr>
<tr>
<td>4.3 Site Inspection and Enforcement</td>
</tr>
</tbody>
</table>
### Construction Site Stormwater Runoff Control

<table>
<thead>
<tr>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4 Receipt of Public Information on Construction Site Compliance</td>
<td>Provide a procedure to receive and consider information from the public.</td>
<td>Summary of information received and actions taken.</td>
<td>City of Westwood Hills*</td>
<td>Start process by Jan 1, 2018 Track as-needed</td>
</tr>
<tr>
<td>4.5 Staff Training</td>
<td>Provide training and information to staff as needed.</td>
<td>Track training provided and participants.</td>
<td>City of Westwood Hills*</td>
<td>Start training by Jan 1, 2018 Track annually</td>
</tr>
<tr>
<td>4.6 Annual Program Review</td>
<td>Assess the Program and revise as required</td>
<td>As needed, note revisions in annual report and update SMP</td>
<td>City of Westwood Hills*</td>
<td>Annual</td>
</tr>
</tbody>
</table>

* City of Westwood Hills denotes responsibilities delegated to the Mayor, the Planning Commission and the Building Official.

### Program Assessment

The overall success of the Construction Site Stormwater Runoff Control Program will be measured through the successful implementation and enforcement of the Erosion and Sedimentation Control Ordinance. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. The following will be measured:

- Adopt ordinance before January 1, 2018
- Number of plans reviewed
- Number of inspections conducted
- Number of NOVs issued
- Number and amount of penalties issued
3.5 CONTROL MEASURE 5 - POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

Description

This minimum control requires the development, implementation, and enforcement of a program to address post-construction stormwater runoff controls from both new development and redevelopment sites after development of sites disturbing one acre or more, including projects that are less than one acre but are part of a larger common plan for development that disturbs one or more acre. KDHE requires the program to include:

- For permittees which have the authority, ordinances or resolutions to address post-construction runoff from new development and redevelopment projects to the extent allowable under state and local law.
- BMPs to prevent or minimize adverse water quality impacts.
- Strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality.
- Means to ensure adequate long-term operation and maintenance of BMPs.

Benefit

Conversion of native landscape to developed landscape increases both the volume of stormwater runoff and pollutant loads in stormwater. The consequences can include erosion, flooding, and pollution, impacting both downstream property owners and public infrastructure. Stormwater controls included in development sites can help reduce impacts and costs to both private property owners and the public.

BMPs, Goals, and Staff

<table>
<thead>
<tr>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1</td>
<td>Regulations and Standards</td>
<td>Develop or update Post Construction Stormwater Management Ordinance.</td>
<td>Ordinance to be adopted per schedule.</td>
<td>City of Westwood Hills*</td>
</tr>
<tr>
<td>5.2</td>
<td>Site Plan Review (No sites greater than one acre currently platted or available)</td>
<td>Require a Post-Construction Stormwater Management Plan for any new development or re-development project that disturbs one acre or more of land.</td>
<td>Review all plans to determine compliance with Post-Construction Stormwater Management Ordinance and design criteria.</td>
<td>City of Westwood Hills*</td>
</tr>
<tr>
<td>5.3</td>
<td>Site Inspection and Enforcement</td>
<td>Establish inspection program for private and public projects.</td>
<td>Implement inspection program.</td>
<td>City of Westwood Hills*</td>
</tr>
<tr>
<td>5.4</td>
<td>Establish long term O&amp;M Program</td>
<td>Establish a program that requires the owner/operator to perform routine inspections and long-term maintenance.</td>
<td>Develop appropriate ordinance and program requirements.</td>
<td>City of Westwood Hills*</td>
</tr>
</tbody>
</table>
### Post-Construction Stormwater Management in New Development and Redevelopment

<table>
<thead>
<tr>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.5 Annual Program Review</td>
<td>Assess Program and revise as required</td>
<td>As needed, note revisions in annual report and update SMP</td>
<td>City of Westwood Hills*</td>
<td>Annual</td>
</tr>
</tbody>
</table>

* City of Westwood Hills denotes responsibilities delegated to the Mayor, the Planning Commission and the Building Official.

Note: City of Westwood Hills will be assisted by the Johnson County Stormwater Management Program which helps cities comply by satisfying Minimum Control Measures (MCM) 1 & 2. In order to satisfy MCM’s 3, 4, 5 & 6, JCSMP will provide model ordinances for illicit discharge detection and elimination (3), erosion and sediment control (4), and post construction runoff control (5) as well as provide training materials on good housekeeping (6).

### Program Assessment

The overall success of the Post-Construction Stormwater Management Program will be measured through the successful implementation and enforcement of a Post-Construction Stormwater Management Ordinance. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. The following will be measured:

- Number of plans reviewed
- Ordinances updated and procedures enacted
3.6 CONTROL MEASURE 6 - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Description
This minimum control measure requires the development and implementation of an operation and maintenance and training program to reduce and prevent stormwater pollution from public facility operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbance, and stormwater system maintenance. It should be noted that the City of Westwood Hills own only one passive green space and its public right-of-way but has no fleet and building maintenance.

Benefit
Leading by example on public facilities and projects provides an opportunity to demonstrate and teach proper techniques to other landowners, and it is available on a routine and ongoing basis.

BMPs, Goals, and Staff

<table>
<thead>
<tr>
<th>Pollination Prevention/Good Housekeeping for Municipal Operations</th>
<th>BMP</th>
<th>BMP Description</th>
<th>Measurable Goal</th>
<th>Lead Staff</th>
<th>Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1 Implement practices to reduce pollution from maintenance on city roads, easements and park.</td>
<td>Design a comprehensive O&amp;M pollutant reduction program. Examples include snow and ice removal, lawn care and toxic material handling.</td>
<td>Develop a pollutant based plan that reduces identified pollutants from activities.</td>
<td>City of Westwood Hills*</td>
<td>Initiate program within 2 yrs of effective date of permit (Jan 1, 2017) Then annual Inspections</td>
<td></td>
</tr>
<tr>
<td>6.2 Develop a program to assess and lessen the pollutant potential from city activities</td>
<td>Design a pollution reduction plan for city operations including snow and ice removal, lawn care and toxic material handling.</td>
<td>Prepare and implement a Stormwater Pollution Prevention Plan for these operations.</td>
<td>City of Westwood Hills*</td>
<td>Jan 1, 2017</td>
<td></td>
</tr>
<tr>
<td>6.3 Conduct staff training.</td>
<td>Provide educational opportunities to educate staff to ensure proficiency in minimizing stormwater pollution from daily operations.</td>
<td>Annual training.</td>
<td>City of Westwood Hills*</td>
<td>Annual beginning in 2017</td>
<td></td>
</tr>
<tr>
<td>6.4 Annual Program Review</td>
<td>Assess Program and revise as required</td>
<td>As needed, note revisions in annual report and update SMP</td>
<td>City of Westwood Hills*</td>
<td>Annual beginning in 2017</td>
<td></td>
</tr>
</tbody>
</table>

*City of Westwood Hills denotes responsibilities delegated to the Public Works Director, the Public Safety Committee Council Person, the Beautification and Landscape Committee Council Person, and/or subcontractors hired by the City of Westwood Hills.
Program Assessment

The overall success of the Pollution Prevention/Good Housekeeping Program will be measured through the successful implementation of facility SWPPPs, employee training and facility inspections conducted as part of the program. Program assessment will be reported with each annual NPDES report discussing the activities completed in this section for the previous program year. The following will be measured:

- The number of inspections conducted
- The number of problems discovered and resolved
- Training classes conducted
- Chemical use reductions
N/A

Section not required as permit does not list any TMDLs.
N/A

Section not required as permit does not list any TMDLs.
## Permit Compliance Schedule and Annual Reporting

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit effective date</td>
<td>January 1, 2015</td>
</tr>
<tr>
<td>Maps of stormwater outfalls, streams and lakes in the targeted TMDL areas</td>
<td>December 31, 2015</td>
</tr>
<tr>
<td>Stormwater Management Plan (SMP)</td>
<td>Prior to February 28, 2016</td>
</tr>
<tr>
<td>Public Education and Outreach program (MCM* 1)</td>
<td>Prior to January 1, 2016</td>
</tr>
<tr>
<td>Public Involvement and Participation (MCM 2)</td>
<td>Prior to January 1, 2016</td>
</tr>
<tr>
<td>Annual Report— including Stormwater Management Plan (Year 1)</td>
<td>February 28, 2016</td>
</tr>
<tr>
<td>Initiate stormwater and stream/lake monitoring programs for TMDL listed waters</td>
<td>July 1, 2016</td>
</tr>
<tr>
<td>Illicit Discharge Detection and Elimination program (including regulations passed) (MCM 3)</td>
<td>January 1, 2017</td>
</tr>
<tr>
<td>Pollution prevention/good housekeeping for municipal operations (MCM 6)</td>
<td>January 1, 2017</td>
</tr>
<tr>
<td>Annual Report (Year 2)— including regulations passed for MCM 3</td>
<td>February 28, 2017</td>
</tr>
<tr>
<td>Storm Sewer System Map</td>
<td>February 28, 2017</td>
</tr>
<tr>
<td>Construction Site Stormwater Runoff Control requirements (including regulations passed)</td>
<td>January 1, 2018</td>
</tr>
<tr>
<td>Annual Report (Year 3)— including regulations passed for MCM 4 and 5</td>
<td>February 28, 2018</td>
</tr>
<tr>
<td>Post-Construction Stormwater Management in new and re-development sites (including regulations passed)</td>
<td>January 1, 2018</td>
</tr>
<tr>
<td>Annual Report (Year 4)</td>
<td>February 28, 2019</td>
</tr>
<tr>
<td>Annual Report (Year 5)</td>
<td>February 28, 2020</td>
</tr>
</tbody>
</table>

* MCM- Minimum Control Measure

Items in bold indicate documentation due to KDHE
Annual Reporting

A calendar year annual report will be submitted to KDHE by February 28 of each year. The report will cover activities conducted during the prior calendar year and will include the following:

- Summary of compliance activities associated with the permit
- A review of the appropriateness of BMPs and progress towards achieving water quality goals
- Results of information collected and analyzed, if any, including monitoring data
- Summary and status of stormwater activities conducted during the previous year
- Summary of stormwater activities scheduled to take place during next reporting cycle (including schedule)
- Map showing changes in jurisdictional permit area, if appropriate
- Description of significant changes in any BMPs, including the six minimum control measures
- Copies of updated ordinances or resolutions associated with this SMP or the six minimum control measures
- Updated list of other parties who will be responsible for implementing program areas of this SMP, if any
This SMP will be evaluated annually, and modifications to the Plan, if any, will be submitted with the annual report.

Minor modifications to BMPs listed in this plan, if needed to meet program objectives, will be made within 60 days determination by the permittee or written notification from KDHE.

Major modifications to BMPs listed in this plan, if needed to meet program objectives, will be proposed in a written plan to KDHE, within 60 days determination by the permittee or written notification from KDHE.

### ANNUAL REVIEWS

<table>
<thead>
<tr>
<th>DATE</th>
<th>CHANGES MADE</th>
<th>COMPLETED BY</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Map Attachment 1 – Westwood Hills Storm Sewer Network

Map Attachment 2 – Stream Map
Johns Co AIMS Map - Westwood Hills Storm Sewer Network

LEGEND

- Building Footprints
  - Building
  - Courtyard
- Stormwater Pipe
- Stormwater Inlet

Disclaimer: No person shall sell, give, reproduce, or receive for the purpose of selling or offering for sale, any portion of the data provided herein. Johnson County makes every effort to produce and publish the most current and accurate information possible. Johnson County assumes no liability whatsoever associated with the use or misuse of such data, and disclaims any representation or warranty as to the accuracy and currency of the data. 5/5/2015

https://ims.jocogov.org/IMSPrint/prnportrait11x17.aspx