

City of Shawnee, Kansas
Stormwater Management Plan
January 1, 2021 through January 31, 2024



Federal Permit No. KSR0410033

Submitted in Compliance with Kansas Permit No. M-KS68-SU01

Date: February 28, 2021

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SECTION 1: INTRODUCTION

This document is a Stormwater Management Plan (SMP, or the “Plan”) created to help reduce the discharge of pollutants in stormwater runoff from the Municipal Separate Storm Sewer System (MS4) within regulated areas of Shawnee, Kansas (Map of permitted area included in Appendix A). 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-KS68-SU01 (hereinafter “the permit”) issued to the City by the Kansas Department of Health and Environment (KDHE) to fulfill requirements of the Clean Water Act.

Permit Effective Date: January 1, 2021

Permit Expiration Date: January 31, 2024

The SMP is designed to:

1. Reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable (MEP),
2. Implement the Six (6) Minimum Control Measures as listed in Part I Section C of the permit:

The Six Minimum Control Measures:

- i. Public Education and Outreach,
 - ii. Public Participation and Involvement,
 - iii. Illicit Discharge Detection and Elimination,
 - iv. Construction Site Stormwater Runoff Control,
 - v. Post-Construction Stormwater Management in New Development and Redevelopment Projects, and,
 - vi. Pollution Prevention/Good Housekeeping for Municipal Operations.
3. Implement Best Management Practices (BMPs) to reduce to the MEP the discharge of the Total Maximum Daily Load (TMDL) regulated pollutants from the MS4 to the watershed of the impaired stream and/or lake as listed in the Permit.
 4. And, satisfy the requirements of the permit, the Clean Water Act, and the Kansas surface water quality statutes and regulations.

Implementation of BMPs consistent with the provisions of the SMP document and this permit constitutes compliance with the standard of reducing pollutants to the Maximum Extent Practicable.

Overall responsibility for coordination of activities outlined in this Plan and for reporting will be by the Stormwater Manager, Cynthia Moeller-Krass P.E., for the City of Shawnee and will submit all documents (Stormwater Management Plan (and updates) and Annual Report) to KDHE.

SECTION 2: SIX MINIMUM CONTROL MEASURES

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

2.1 MINIMUM CONTROL MEASURE 1 (MCM 1) - PUBLIC EDUCATION AND OUTREACH

Description

MCM 1 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.

Compliance

Compliance with the public education and outreach minimum control measure requires implementation of BMPs in Part I., Section C.1 of the Permit for a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 7 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 1.

A short description of each planned BMP is included in the table below.

Table 1. Planned BMPs to meet MCM 1 requirements.

BMP ID	BMP Summary	Points per year			
		2021	2022	2023	2024
P Ed & 0 - 01	Maintain a stormwater webpage for the permittee.	3	2	2	2
P Ed & 0 - 02	Distribute educational materials (either flyers, brochures, catalog mailings, handouts, or e-mails) addressing various pertinent stormwater public education topics.	2	2	2	2

P Ed & 0 - 04	Apply notification, placard, covers or hatches with message similar to “No Dumping – Drains to River”.	2	2	2	2
P Ed & 0 - 05	Post the municipality's MS4 permit and SMP document on either the stormwater web page or the municipal webpage.	1	1	1	1
P Ed & 0 - 06	Provide either a stormwater telephone hotline or web based or text message method for public reporting of illicit discharges.	2	2	2	2
P Ed & 0 - 08	Provide stormwater education for students at a school campus within K-12 (those grades present at the campus) within the permittee's jurisdiction or within 30 miles from this permit area. Alternately, funding stormwater BMP installations and/or field trips at the school campus will qualify.	3	3	3	3
P Ed & 0 - 15	Participate in an ongoing social media program on pertinent stormwater public education topics.	2	2	2	2
	Total points per year	15	14	14	14

2.2 MINIMUM CONTROL MEASURE 2 (MCM 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 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. MCM 2 also provides opportunity to the community to participate in activities, such as park or stream bank clean-up events, that help to remove pollutants from the MS4.

Compliance

Compliance with the public involvement and participation minimum control measure requires implementation of BMPs in Part I., Section C.2 of the Permit for a minimum of 3 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 6 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 2.

A short description of each planned BMP is included in the table below.

Table 2. Planned BMPs to meet MCM 2 requirements

BMP ID	BMP Summary	Points per year			
		2021	2022	2023	2024
P I/P - 03	Hold park or stream bank clean-up events for public volunteers to aid municipal staff in removing trash, debris, or pollutant sources from the selected clean-up area.	3	3	3	3
P I/P - 05	Provide at least two events for residents to engage in cleanup activities and improve water quality in the municipality.	3	3	3	3
P I/P - 06	Establish a program to encourage residents to install stormwater treatment best management practices on their property.	2	2	2	2
P I/P - 07	Enact an ordinance or enforceable requirement that requires pet owners to properly dispose of pet waste at City Parks.	1	1	1	1
Total points per year		9	9	9	9

2.3 MINIMUM CONTROL MEASURE 3 (MCM 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. The City of Shawnee passed pollution prevention regulations Shawnee Ordinance 2824 in October 1, 2006, to regulate unlawful discharges into streams and the storm drain 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.

Compliance

Compliance with the illicit discharge detection and elimination minimum control measure requires implementation of BMPs in Part I., Section C.3 of the Permit for a minimum of 5 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 7 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 3.

A short description of each planned BMP is included in the table below.

Table 3. Planned BMPs to meet MCM 3 requirements

BMP ID	BMP Summary	Points per year			
		2021	2022	2023	2024
ID D & E - 03	Develop a spill response plan and, if appropriate, coordinate emergency response with other agencies or organizations.	3	2	2	2
ID D & E - 06	Televise pipes or directly visualize open channel drainage for illicit discharge (5% or 2%).	3	3	3	3
ID D & E - 07	Implement a Household Hazardous Waste Collection Program or document others have implemented such a program to provide such service to all property owners or residents located within the permit area.	3	3	3	3
ID D & E - 10	Inspect, (5% or 2%) of the MS4 system Stormwater inlets and/or outfalls within the permit area to identify illicit discharge.	3	3	3	3
	Total points per year	12	11	11	11

2.4 MINIMUM CONTROL MEASURE 4 (MCM 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. The City of Shawnee passed erosion and sediment control regulations Shawnee Ordinance 2867 on January 1, 2008, to regulate runoff pollution from active construction sites disturbing more than one acre.
- Requirements for construction site owners or operators to implement erosion and sediment control BMPs.
- Requirements for construction site owners or operators to control waste at construction sites 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 left 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.

Compliance

Compliance with the construction site stormwater runoff control minimum control measure requires implementation of BMPs in Part I., Section C.4 of the Permit for a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 6 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 4.

A short description of each planned BMP is included in the table below.

Table 4. Planned BMPs to meet MCM 4 requirements

BMP ID	BMP Summary	Points			
		2021	2022	2023	2024
CS SR C - 01	Implement a requirement for a Soil Erosion and Sediment Control (SESC) Plan for any land Disturbance sites which are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	3	2	2	2
CS SR C - 02	Develop and adopt a design manual for erosion and sediment control BMPs which are required to be used on sites which will be disturbed and are either equal to or greater than 1 acre or for which there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more.	3	2	2	2
CS SR C - 03	Provide access to at least one training class for contractors, developers or others involved with land disturbance projects which provides training on requirements for a Stormwater Pollution Prevention Plan (SWP2 Plan) and implementation of appropriate BMPs.	3	3	3	3
CS SR C - 04	Develop a site plan review process which considers potential water quality impacts which may occur during construction as well as post construction impacts.	3	2	2	2
CS SR C - 05	Establish effective requirements for construction sites to control wastes. Develop through ordinance or other enforceable means requirements for construction site operators or owners to control wastes. At a minimum control shall be imposed to prevent entry into the MS4 for the following wastes; discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste.	3	2	2	2
	Total points per year	15	11	11	11

2.5 MINIMUM CONTROL MEASURE 5 (MCM 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 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 that 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 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.

Compliance

Compliance with the post-construction stormwater management in new development and redevelopment minimum control measure requires implementation of BMPs in Part I., Section C.5 of the Permit for a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 6 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 5.

A short description of each planned BMP is included in the table below.

Table 5. Planned BMPs to meet MCM 5 requirements

BMP ID	BMP Summary	Points			
		2021	2022	2023	2024
P-C SM - 01	Develop and adopt a custom design manual for Post-Construction Stormwater Management which specifies various structural BMPs required for new development and re-development construction sites which are greater than 1 acre or for where there is construction activity disturbing less than one acre which is part of a larger common plan of development or sale that in total disturbs one acre or more. Alternatively, adopt and implement the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual.	6	5	5	5
P-C S M - 05	Develop and implement a program for inspection of permittee owned structural BMPs which includes implementation of needed maintenance to ensure long-term operation of the BMPs	3	2	2	2
	<i>Total points per year</i>	9	7	7	7

2.6 MINIMUM CONTROL MEASURE 6 (MCM 6) - POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Description

MCM 6 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.

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.

Compliance

Compliance with the post-construction stormwater management in new development and redevelopment minimum control measure requires implementation of BMPs in Part I., Section C.5 of the Permit for a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 6 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 6.

A short description of each planned BMP is included in the table below.

Table 6. Planned BMPs to meet MCM 6 requirements.

BMP ID	BMP Summary	Points			
		2021	2022	2023	2024
P P/G H - 04	Implement a program, with guidance to municipal staff or third-party contractors, to ensure any municipal vehicle or other mechanical equipment washing is conducted in a manner which ensures the wash water is disposed of in the sanitary sewer or otherwise receives proper treatment prior to discharge to the environment.	2	1	1	1
P P/G H - 05	Implement a program for street sweeping in which the street sweepings are collected and disposed of properly or recycled/reused if possible.	3	2	2	2
P P/G H - 06	Develop an employee training program to ensure permittee's staff understand what actions they can take in the workplace to minimize stormwater pollution.	1	1	1	1
P P/G H - 08	Develop, implement and keep updated an online storm sewer map accessible to the public.	3	2	2	2
<i>Total points per year</i>		9	6	6	6

SECTION 3: Total Maximum Daily Load (TMDL) Regulated Pollutants

The City of Shawnee will continue to review, update, implement, and develop, when necessary, structural and non-structural BMPs which will reduce the discharge of TMDL regulated pollutants from the MS4 to the Maximum Extent Practicable.

The effort to reduce the discharge of TMDL regulated pollutants is anticipated to be an iterative process with changes in the SMP periodically. This “adaptive management” type process, informed by monitoring data and other information collected during the term of this permit is recommended to attenuate the discharge of TMDL regulated pollutants listed in the TMDL table below.

TMDL regulated pollutants and impaired streams identified in Shawnee’s 2019 permit are listed below:

Impaired Stream	TMDL Regulated Pollutant		
	Bacteria	Nutrients	Sediment
Litte Mill Creek	X	X	X
Clear Creek	X	X	X

TMDL Best Management Practices (BMPs)

Compliance with Total Maximum Daily Load (TMDL) Best Management Practices and Surface Water Monitoring requires implementation of BMPs in Part II., Section A of the Permit for a minimum of 4 points total on an annual basis for each calendar year 2021 and 2022. The minimum point total requirement increases to 6 points beginning in year 2023.

A table containing the BMP summary, the measurable goal, the implementation schedule, and points per activity is included in Appendix B: Table 7.

A short description of each planned BMP is included in the table below.

Table 7. Planned BMPs to meet TMDL requirements.

BMP ID	BMP Summary	Points			
		2021	2022	2023	2024
TMDL -01	Install pet waste stations which include a glove/bag dispenser with signage and waste can to encourage pet waste disposal at either parks, trails, rest areas or other public lands owned by the permittee.	1	1	1	1
TMDL - 04	Enact a stream buffer ordinance, resolution or other enforceable requirement to impose stream buffer standards.	3	2	2	2
TMDL - 05	Develop a pet waste brochure or flyer document to educate the public about animal waste contamination of stormwater. The document encourages pet owners to pick up their pet's waste. Alternately, post the document on social media or the municipal website.	1	1	1	1
TMDL - 06	Distribute "Only Rain Down the Drain" door hangers or similar document or social media.	2	2	2	2
	<i>Total points per year</i>	7	6	6	6

SECTION 4: Water Quality Monitoring for TMDL assessments

Success in achieving reductions in bacteria, nutrients, and sediment will be assessed by directly monitoring in-stream concentrations and evaluating pollutant concentration trends across the permit period. The monitoring program is conducted by the Johnson County Stormwater Management Program on behalf of the cities within Johnson County.

Beginning in 2019, the Johnson County Stormwater Management Program implemented a rotational monitoring approach for all watersheds within the County with the objectives of:

1. Measuring effectiveness of BMPs implemented through the City's Permit and Stormwater Management Plan;
2. Evaluating MS4 discharge impacts to receiving waters;
3. Investigating relative contribution of sources of specific pollutants causing designated use impairment, including nutrients, pathogens, sediment or other applicable parameters related to stormwater from areas serviced by the MS4; and
4. Gather data to inform future program decisions and prioritization of activities related to the protection of water quality.

The monitoring program consists of both rotating and fixed monitoring stations (Table 8 and Figure 1). Rotating stations will be monitored within the rotational year. The rotational year occurs on a five-year recurrence interval and is basin specific. Fixed monitoring states will be monitored on an ongoing basis independent of the rotational year.

Table 8. Monitoring station locations and rotational monitoring year.

Watershed Organization Grouping (Basin)	EDMR_Code	Monitoring Location	Site ID	Site Type	Rotational Monitoring Year
2	SW034A6	Indian Creek at Marty St.	0202IND	rotating	2019
2	SW035A6	Indian Creek at Switzer Rd.	0203IND	fixed	2019
2	SW036A6	Indian Creek at Blackbob Rd.	0204IND	rotating	2019
2	SW037A6	Indian Creek at State Line Rd.	0201IND	fixed	2019
2	SW038A6	Tomahawk Creek at Roe Ave.	0205TOM	fixed	2019
6	SW002A6	Camp Creek at 95th St.	0608CAM	rotating	2020
6	SW007C6	Cedar Creek at 127th St.	0606CED	rotating	2020
6	SW008A6	Cedar Creek at 83rd St.	0605CED	fixed	2020
6	SW009A6	Clear Creek at Woodland Dr.	0604CLE	rotating	2020
6	SW010A6	Little Cedar Creek at 119th St.	0607LCC	rotating	2020
6	SW011A6	Little Mill Creek at Tomahawk Golf Course	0603LMC	rotating	2020
6	SW012A6	Mill Creek at Johnson Dr.	0601MIL	fixed	2020
6	SW007A6	Mill Creek at 87th Ln.	0602MIL	rotating	2020
3	SW014A6	Blue River at Kenneth Rd.	0301BLU	fixed	2021
3	SW015A6	Camp Branch at 183rd St.	0305CAM	rotating	2021
3	SW016A6	Coffee Creek at Switzer Rd.	0303COF	rotating	2021
3	SW017A6	Negro Creek at Mission Rd.	0306NEG	rotating	2021
3	SW018A6	Wolf Creek at 179th St.	0304WOL	rotating	2021
3	SW019A6	Blue River at Hwy 69	0302BLU	fixed	2021
1	SW020A6	Brush Creek at State Line Rd.	0101BRU	fixed	2022
1	SW021A6	Brush Creek at Roe Ave.	0102BRU	rotating	2022
1	SW022A6	Rock Creek at Mission Rd.	0103ROC	rotating	2022
1	SW023A6	Turkey Creek at Lamar Ave.	0104TUR	fixed	2022
1	SW024A6	Turkey Creek at 67th St.	0105TUR	rotating	2022
4	SW025A6	Bull Creek at 199th St.	0402BUL	rotating	2023
4	SW005B6	Bull Creek at Interstate 35	0401BUL	fixed	2023
4	SW027A6	Little Bull Creek at 199th St.	0404LBC	fixed	2023
4	SW028A6	Martin Creek at Hwy 56	0403MAR	rotating	2023
4	SW029A6	Spring Creek at 215th St.	0405SPR	rotating	2023
5	SW030A6	Captain Creek at 103rd St.	0504CAP	rotating	2023
5	SW001A6	Kill Creek at 95th St.	0501KIL	fixed	2023
5	SW032A6	Kill Creek at 127th St.	0502KIL	rotating	2023
5	SW033A6	Spoon Creek at 151st St.	0503SPO	rotating	2023

Figure 1. Locations of Fixed and Rotating Monitoring Stations



Water Quality Monitoring Protocol

Water quality samples will be collected from all fixed monitoring stations, as well as monitoring stations in the rotational basin, a minimum of six times per year between April and September regardless of streamflow conditions (Table 9). Additionally, water quality samples will be collected from rotational basins (fixed and rotational monitoring sites) during a minimum of three storm events per year between April and September. Storm events are defined as the streamflow conditions that generally correspond to a rainfall event that is greater than or equal 0.25 inches.

Water quality samples are collected as grab samples and pH, Dissolved Oxygen, Temperature, and Specific Conductance measurements are collected in the field at the time of sampling. Other information that is collected in the field at the time of sample collection includes rainfall, streamflow, stream level, and stream velocity.

Samples are analyzed at the Johnson County Wastewater Laboratory. Samples are analyzed for Total Phosphorus as P (mg/L), Ortho-Phosphorus as P (mg/L), Total Kjeldahl Nitrogen (mg/L), Nitrate plus Nitrite as N (mg/L), Total Suspended Solids (mg/L), Turbidity (NTU), and E. Coli bacteria (MPN).

Johnson County shall report data for water quality monitoring annually to KDHE and an annual report describing water quality conditions and including all data collected will be provided to the City.

SECTION 5: Permit Compliance Activities and Schedules

Year 2019:

- Annual report for 2018 submitted to KDHE by February 28, 2019
- Permittee must submit required information for water quality monitoring locations (Johnson County Stormwater Management Program is responsible for the City's monitoring program)
- Storm event monitoring data for 2019 entered into eDMR database by January 28, 2020 (Johnson County Stormwater Management Program is responsible data entry for the City's monitoring program).

Year 2020:

- Annual report for 2019 submitted to KDHE by February 28, 2020
- Storm event monitoring data for 2020 entered into eDMR database by January 28, 2021 (Johnson County Stormwater Management Program is responsible data entry for the City's monitoring program).

Year 2021:

- Updated Stormwater Management Plan submitted to KDHE by February 28, 2021
- Annual report for 2020 submitted to KDHE by February 28, 2021
- The City must implement sufficient listed BMPs to achieve minimum point requirements for 2021.
- Storm event monitoring data for 2021 entered into eDMR database by January 28, 2022 (Johnson County Stormwater Management Program is responsible data entry for the City's monitoring program).

Year 2022:

- Annual report for 2021 submitted to KDHE by February 28, 2022
- The City must implement sufficient listed BMPs to achieve minimum point requirements for 2022.
- Storm event monitoring data for 2022 entered into eDMR database by January 28, 2023 (Johnson County Stormwater Management Program is responsible data entry for the City's monitoring program).

Year 2023:

- Annual report for 2022 submitted to KDHE by February 28, 2023
- Provide report (in PDF format) on effectiveness of source controls and structural BMPs to attenuate pollutant discharge and achieve the measurable goals as well as a summary of water quality data from stream monitoring sites. The report must be submitted to KDHE with the 2022 Annual Report by February 28, 2023.
- The City must implement sufficient listed BMPs to achieve minimum point requirements for 2023.
- Storm event monitoring data for 2023 entered into eDMR database by January 28, 2024 (Johnson County Stormwater Management Program is responsible data entry for the City's monitoring program).

Year 2024:

- Annual report for 2023 submitted to KDHE by February 28, 2024
- The City must implement sufficient listed BMPs to achieve minimum point requirements for 2023.
- Storm event monitoring data for 2024 entered into eDMR database by January 28, 2025 (Johnson County Stormwater Management Program is responsible data entry for the City's monitoring program).

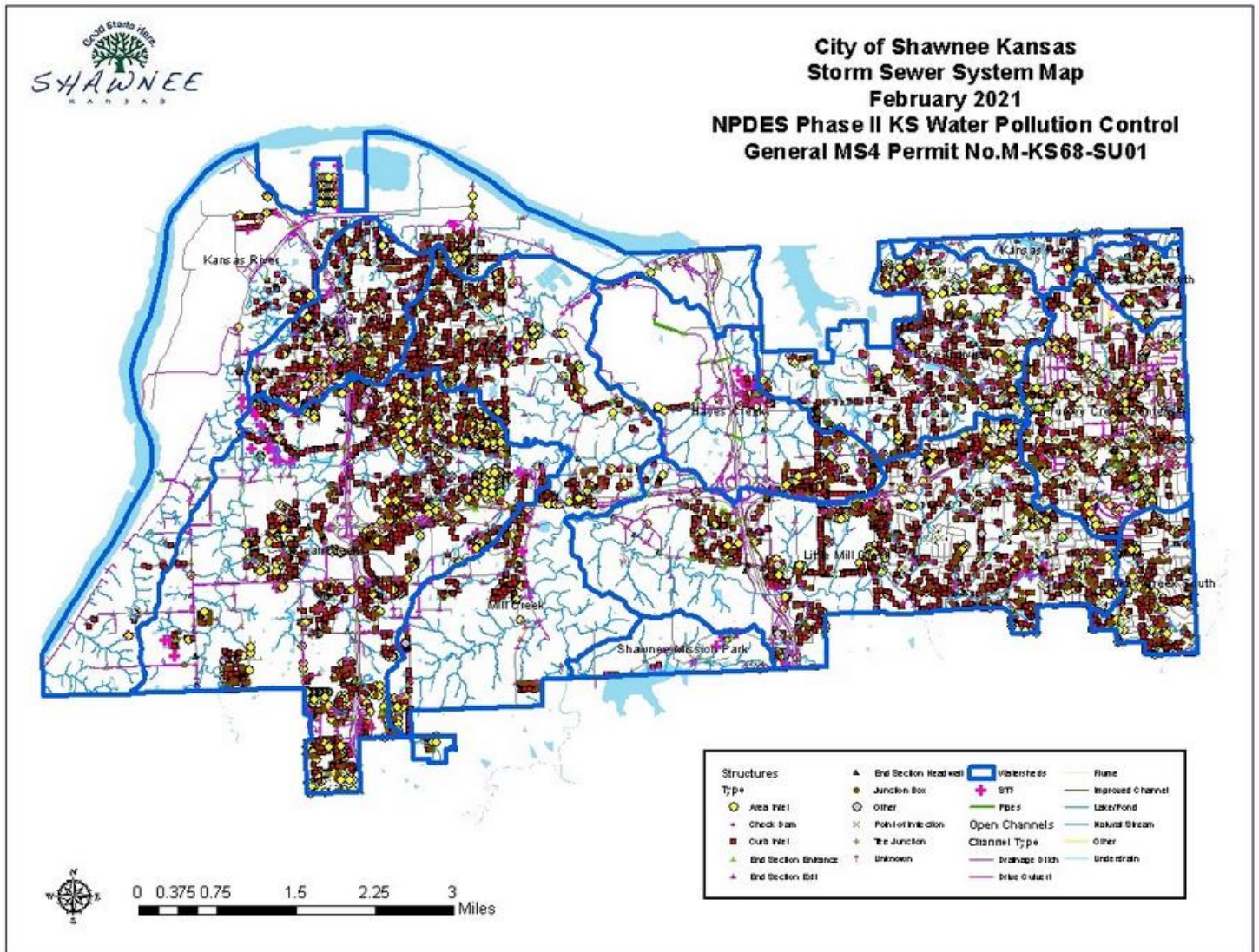
SECTION 6: Modifications to the Stormwater Management Plan

This SMP will be evaluated annually and modifications to the Plan, if any, will be submitted with the annual report.

For minor BMPs modifications/replacement: Within 60 days of a determination by the permittee or date of written notification from KDHE, the permittee shall modify the BMP if modifications are needed to maintain a program in compliance with this permit.

For major BMP modifications/replacement: These major modifications are defined as ones which normally take more than 60 days to construct and/or implement. Within 60 days of a determination by the permittee or date of notification from KDHE, the permittee shall provide a plan and schedule for the update/replacement of the BMP. The plan and schedule are subject to KDHE approval.

ATTACHMENT A



Appendix B: Tables 1-7 Planned BMPs for Permit Compliance - See attached spreadsheet.