

**KANSAS STORMWATER 2024 ANNUAL REPORT FORM  
FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)**

Please place an "X" in the left box if any information has changed from previous years

<input type="checkbox"/>	Permittee [Agency Name]:	City of Westwood Hills
<input type="checkbox"/>	Mailing Address 1:	2216 West 49 <sup>th</sup> Street
<input type="checkbox"/>	Mailing Address 2:	
<input type="checkbox"/>	Municipality:	Westwood Hills
<input type="checkbox"/>	State:	Kansas
<input type="checkbox"/>	Zip Code:	66205
<input type="checkbox"/>	MS4 Program Contact Person:	Beth O'Bryan
<input type="checkbox"/>	Contact E-Mail Address:	clerk@westwoodhillsks.gov
<input type="checkbox"/>	Contact Phone Number:	913.262.6622
<input type="checkbox"/>	Construction E-Mail Address:	clerk@westwoodhillsks.gov
<input type="checkbox"/>	Contact Phone Number:	913.262.6622
<input type="checkbox"/>	Kansas Permit Number:	<u>M-MO39-SU01</u>

Reporting period covers activities from January 1, 2024, through December 31, 2024.

This annual report must be submitted to the Kansas Department of Health and Environment (KDHE) by February 28, 2025. The annual report is to be submitted as PDF files to KDHE via Kansas Environmental Information Management System (KEIMS). There is no requirement to provide hard copies of any documents.

**IN ADDITION**, provide the following:

1. A current copy of the Stormwater Management Program (SMP) Document as a PDF file along with the Annual Report.

***The City's current Stormwater Management Plan (effective January 1, 2021) has been uploaded to KEIMS as a separate pdf file.***

2. Include an executive summary to this report which briefly covers the major aspects of the MS4 stormwater management program enacted during the year. In completing the executive summary, the preparer should address the following questions:

1. Were there any aspects of the program that appeared especially effective at reducing pollutants in your stormwater discharge?
2. Were there any aspects of the program that provided unsatisfactory results?
3. What was the most successful part of the program?
4. What was the most challenging aspect of the program?
5. Describe any City/County area MS4 clean-ups and the participation.
6. Describe the elected officials' participation in the stormwater pollution elimination.
7. Describe the collaboration with other organizations to eliminate stormwater pollution.
8. If an audit/inspection of your MS4 program was conducted by EPA or KDHE during the year, list the items the audit/inspection report identified as required changes and provide a narrative explanation of how the changes were implemented or explain the plan to implement the changes and identify a target date for final implementation.

### **Executive Summary:**

This Executive Summary briefly covers the major aspects of the Westwood Hills MS4 stormwater management program during 2024, by specifically addressing the questions below.

1. *Were there any aspects of the program that appeared especially effective at reducing pollutants in your stormwater discharge?*

The City of Westwood Hills contracted with the City of Roeland Park for a fall leaf pick up. The clean up occurred in early December 2024. In addition, throughout the year, residents are reminded to clean up the leaves and debris in the street gutters in front of their homes. With regard to both the leaf pick up and gutter cleaning, residents have been cooperative in participating in these activities. In December 2024, just after the city-wide leaf pick up, the City engaged a contractor to sweep all streets within the City. After both the leaf pick up and street sweeping, the City engaged a third party contractor to clean out the stormwater inlets located within the City. The contractor removed debris which consisted almost exclusively of leaves and other organic materials.

Also, a few years ago, a dog waste bag dispenser and trash receptacle were installed on The Green, which is the City's park. During 2024, more than 500 pet waste bags were dispensed from the pet waste bag dispenser installed on The Green, with that dog waste being properly disposed so that this waste did not become part of the run-off water to the creek which runs through The Green.

Due to the nature of non-point source pollution, it is difficult to say that any aspect of the program was the most effective at reducing pollutants in stormwater runoff. However, we believe that our efforts, through the Johnson County Stormwater Management Program (JCSMP) and the K-State Extension service, under public education and outreach (MCM 1) and public involvement and participation (MCM 2) that were focused on responsible lawn care practices and anti-littering were very successful at reaching a broad number of residents with messaging that hopefully will encourage behavior change or, at the very least, increase awareness.

2. *Were there any aspects of the program that provided unsatisfactory results?*

There were no aspects of the City of Westwood Hills program that provided unsatisfactory results, but we do have room for improvement. In 2024, only one City resident participated in the BMP Cost Share program funded by JCSMP encouraging the planting of native trees and plants and the installation of rain gardens or permeable pavement. We hope to increase participation in the Cost Share program in future years.

3. *What was the most successful part of the program?*

The City of Westwood Hills was pleased with public compliance with properly disposing of any toxic or non-toxic materials so that the same would not flow into the sewer system or creek and with the City residents' usage of the yard waste collection program and city-wide leaf pick-up. Additionally, residents are becoming more understanding about keeping street gutters and stormwater inlets clear of leaves and other debris.

Public education and outreach efforts through the multiple approaches from the city, county, and regional levels were successful. The ability to conduct outreach through multiple outlets will hopefully continue to increase the public's awareness of water quality issues and of what citizens can do to help. Additionally, the partnership with K-State Extension promotes water quality messaging and provides information regarding lawn and garden care, thus targeting a likely source for excess nutrients in urban streams.

Once again, in September 2024, several northeast Johnson County cities partnered to hold a Go Green 2024 Environmental event. This event attracted many area residents to the Sylvester Powell Center to view displays and obtain information from exhibitors on a wide range of environmental topics, including the JoCo Contain the Rain program. The City participated in this event with both volunteers and a financial contribution of \$100. The City will likely continue to participate in this Go Green annual event in future years.

4. *What was the most challenging aspect of the program?*

Time constraints and increasing costs continue to be key challenges. As a small city of the third class, the City of Westwood Hills has no full-time staff to engage in public education efforts, monitor compliance, and maintain records.

The most challenging aspect of this program has always been drawing a correlation between activities in the Stormwater Management Plan to actual improvements in water quality. For example, Johnson County reached millions of people with regional, county, and city public education and outreach campaigns over the past several years, but there is no direct way to attribute this public education and outreach to actual pollutant reduction numbers.

5. *Describe any City/County area MS4 clean-ups and the participation.*

The City held a city-wide leaf pick-up in December, followed by a street sweeping of all City streets. A group of citizens held a volunteer day in April of 2024, in honor of Earth Day, and collected trash and yard debris from the City's public sidewalks and The Green (the City's green space). Additionally, the City coordinates The Green Team, a volunteer committee, whose members volunteered many hours to clean up and maintain the city park, The Green, through which runs a small stream. Finally, in December of 2024, the City hired a third-party contractor to inspect and clean the City's stormwater inlets. The contractor properly disposed of the debris removed from the stormwater inlets, and no evidence of illicit discharges was discovered.

6. *Describe the elected officials' participation in the stormwater pollution elimination.*

The Mayor of the City of Westwood Hills and City Council members individually assist and coordinate everything from meeting with engineers and contractors with which the City contracts for stormwater inlet cleaning to publicizing the BMP Cost Share program so as to encourage the planting of native trees and plants. Also, one of the City Council members led the coordination of efforts of The Green Team, some Council members personally participated in volunteer days to clean up The Green, and another City Council member served as a

member of the steering committee for the 2024 annual Go Green event held in Northeast Johnson County. Additionally, the City is participating in the Kansas City area-wide effort to revise the APWA 5600 standards and the MARC BMP Manual.

7. *Describe the collaboration with other organizations to eliminate stormwater pollution.*

The City of Westwood Hills partnered with the Johnson County Stormwater Management Program (JCSMP), which coordinated a cooperative approach for permitted Johnson County cities to help meet selected minimum control measures mandated in the NPDES Phase 2 MS4 permits. In particular, the JCSMP coordinates efforts for some of the best management practices (BMPs) for Minimum Control Measures (MCM) 1 and 2 but also assists with MCMs 3-6. The coordinated approach through this partnership has proven to be cost effective and reduces redundancy among the cities in Johnson County. Also, on behalf of Johnson County cities, JCSMP partners with Johnson County K-State Extension, Mid-America Regional Council Water Quality Education Committee, Friends of the Kaw, Stone Lion Puppet Theater, the city of Olathe Public Works (for Household Hazardous Waste Collection), and the Johnson County Department of Health and Environment (also for household hazardous waste collection, and other things such as the stormwater pollution reporting hotline for Johnson County). The City of Westwood Hills also contracted with the City of Roeland Park for city-wide leaf pick up services.

8. *If an audit/inspection of your MS4 program was conducted by EPA or KDHE during the year, list the items the audit/inspection report identified as required changes and provide a narrative explanation of how the changes were implemented or explain the plan to implement the changes and identify a target date for final implementation.*

KDHE conducted an audit of the City's MS4 program on August 15, 2024. KDHE found that the City of Westwood Hills was in compliance with its MS4 permit. The KDHE's audit results and compliance finding are included in the September 9, 2024, correspondence and enclosures from Sydney Hohn. No EPA audit or inspection of the City's MS4 permit occurred in 2024.

3. Any new stormwater ordinances/resolutions or revised ordinances/resolutions which have not already been submitted to KDHE for review and retention.

***The City of Westwood Hills, Kansas did not adopt any new stormwater ordinances or resolutions or revise any existing ordinances or resolutions during calendar year 2024. All stormwater ordinances and resolutions in effect have been previously submitted to KDHE.***

***[Remainder of this page intentionally left blank.]***

## TOPICS REQUIRED TO BE ADDRESSED IN THIS REPORT AS IDENTIFIED IN PART V OF THE PERMIT

Within the next one or two pages, or perhaps more if so desired, provide comments addressing the following items:

1. Provide the status of compliance with permit conditions, an assessment of the appropriateness of the implemented Best Management Practices, progress towards achieving the statutory goal of reducing the discharge of pollutants to the maximum extent practicable (MEP), and the measurable goals with an indication of the progress toward meeting the goals for each of the six minimum control measures.

***The City's compliance with the permit conditions is detailed in the responses provided in the tables below for the six minimum control measures.***

2. Provide results of information collected and analyzed, (for example test results, surveys, or public comments/input) during the annual reporting period. This may include monitoring data used to assess the success of best management practices with respect to reduction in pollutant discharge. Include an interpretation of the information which addresses success or failure of the portion of the program for which the information applies.

***The City has posted its MS4 Permit, including the latest MS4 permit effective September 1, 2023, Stormwater Management Plan (effective January 1, 2021), and the 2023 SMP Annual Report on the stormwater page of its website and included notices about the Stormwater Management Plan and the 2023 SMP Annual Report in each of its monthly emailed newsletters, with links to both documents. The City's monthly newsletters are e-mailed to all Westwood Hills households for which the City has an e-mail address (approximately 95% of households). All City newsletters are also posted on the City's website. Although the City has provided opportunity for its residents to comment, the City has not received any comments or concerns about the SMP or the 2023 SMP Annual Report.***

***Under the terms of its MS4 permit, the City is not required to conduct any water testing or monitoring.***

3. Provide results of information collected and analyzed, if any, during the annual reporting period, including monitoring data used to assess the success of the program at reducing the TMDL regulated pollutants.

***The City of Westwood Hills has no TMDL permit requirements and did not collect any such information during 2024.***

4. Provide a summary of the stormwater activities that were scheduled to be undertaken during the previous calendar year and the status of these activities.

***The City's stormwater activities undertaken during 2024 are reported and detailed in the responses provided in the tables below for the six minimum control measures. In addition, the City scheduled and held a City-wide leaf pick-up in the fall of 2024 and a city-wide street sweeping after the leaf pick-up.***

5. Provide a summary of the stormwater activities which are scheduled to be undertaken during the next calendar year (including an implementation schedule).

***As the City's current MS4 permit expires at the end of 2025, the City anticipates investigating additional possibilities for stormwater activities and possible BMP implementation. With the new MS4 permit, the City will likely draft a new Stormwater Management Plan which will align with the terms of the new permit and possibly include new BMPs not included in the current SMP for Westwood Hills.***

6. Provide a map showing changes in the permittee's Permit Area if the permit area has changed within the year.

***The City has uploaded a map of the permit area in KEIMS, but the City's permit area did not change during 2024.***

7. Provide a description of significant changes in any of the BMPs.

***During 2024, the City of Westwood Hills did not adopt any significant changes in any of the BMPs set forth in its current Stormwater Management Plan, with an effective date of January 1, 2021. The BMPs set forth in the 2021 SMP are different from prior BMPs so that they align with the terms of the MS4 permits requiring minimum points in each of six minimum control measures. Although the City received a new MS4 permit in 2023 (with an effective date of September 1, 2023), the BMPs in the Stormwater Management Plan were not modified. The City's BMPs will likely be modified in a new Stormwater Management Plan that the City anticipates will be required as a result of a new MS4 permit to be issued prior to the end of 2025.***

8. Provide a list of any ordinances or resolutions which were updated in the last year and are associated with the SMP. Please note, page one of this report requires submission of any new stormwater related ordinances or resolutions or any such updated ordinances or resolution be submitted with this annual report.

***During calendar year 2024, the City of Westwood Hills did not update any ordinances or resolutions associated with its SMP.***

9. Provide a list of other parties (such as other municipalities or consultants), which are responsible for implementing any of the program areas of the Stormwater Management Program.

***Although the City of Westwood Hills is ultimately responsible for permit compliance, the City partners with the Johnson County Stormwater Management Program, Mid-America Regional Council (MARC), and K-State Research and Extension, among others, particularly to provide assistance with public education and outreach, public involvement and participation, and illicit discharge elimination and detection. As Westwood Hills contracts with the City of Westwood for public works services and for building permit services, the City of Westwood Hills also relies on the City of Westwood to comply with pollution prevention and good housekeeping with respect to municipal operations and to assist with issues pertaining to construction and post-construction stormwater runoff control.***

10. For Phase I permittees only, provide a summary of the inspection results, including the wet weather surface water quality monitoring test results, and information obtained under PART III Monitoring Industrial Stormwater Discharges section of this permit.

***The City of Westwood Hills is not a Phase I permittee and has no requirements for water quality monitoring.***

***[Remainder of this page intentionally left blank.]***

## **MS4 SIX MINIMUM CONTROL MEASURES FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4'S) WITH NPDES PERMITS (MS4)**

The following outlines the NPDES permit requirements for implementation of the Six Minimum Control Measures as required under Kansas MS4 permits issued by the KDHE. The NPDES permit provided to the MS4 authority should be reviewed for additional requirements associated with implementation of the Six Minimum Control Measures such as deadlines for the implementation of the requirements or supplemental requirements associated with the individual measures. The general requirements are as follows:

**A. Six Minimum Controls** — The permittee shall develop and implement Best Management Practices (BMPs) with measurable goals for each of the six minimum control measures. The six minimum control measures and associated requirements are listed and explained as follows:

### **1. Public Education and Outreach**

The permittee shall implement a public education program which includes distribution of educational materials to the community or conducting equivalent outreach activities which address the impacts of stormwater discharges on water bodies and the steps the public can take to reduce pollutants in stormwater runoff.

### **2. Public Involvement and Participation**

The permittee shall implement a public involvement and participation program to solicit public comment and recommendations regarding the BMPs and measurable goals utilized by the permittee to comply with the permit. The permittee shall comply with state and local public notice requirements when implementing a public involvement and participation program.

### **3. Illicit Discharge Detection and Elimination**

The permittee shall:

- a. Develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4;
- b. Develop a storm sewer system map of the permittee's MS4, showing the location of all outfalls, either pipes or open channel drainage, showing the names and location of all streams or lakes that receive discharges from those outfalls. A copy of the map shall be submitted to KDHE. This map may be submitted as a PDF file(s) on a CD or DVD.
- c. Enact ordinances or resolutions to prohibit non-stormwater discharges into the storm sewer system and implement appropriate enforcement procedures and actions if the permittee has such authority. A copy of the ordinances or resolutions shall be submitted to KDHE.
- d. Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; and
- e. Develop and implement a plan to detect and address prohibited non-stormwater discharges, including but not limited to illegal dumping, to the storm sewer system. Unless identified by either the permittee or KDHE as a significant source of pollutants to waters of the state, the following examples of non-stormwater discharges are not prohibited from entering the MS4:

1. Water line flushing
2. Diverted stream flow
3. Rising groundwaters
4. Uncontaminated groundwater infiltration as defined under 40 CFR 35.2005(20) to separate storm sewers
5. Uncontaminated pumped groundwater
6. Contaminated groundwater if authorized by KDHE and approved by the municipality
7. Discharges from potable water sources
8. Foundation drains
9. Air conditioning condensate
10. Irrigation waters
11. Springs
12. Water from crawl space pumps
13. Footing drains
14. Lawn watering
15. Individual residential car washing
16. Occasional not-for-profit car wash activities
17. Flows from riparian habits and wetlands
18. Dechlorinated swimming pool discharges excluding filter backwash
19. Street wash waters (excluding street sweepings which have been removed from the street)
20. Discharges of flows from firefighting activities
21. Heat pump discharge waters (residential only)
22. Treated wastewater meeting requirements of a NPDES permit
23. Sump pump drains
24. Other discharges determined not to be a significant source of pollutants to waters of the state, a public health hazard, or a nuisance

#### **4. Construction Site Stormwater Runoff Control**

The permittee shall develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activity disturbing less than one acre must be included in the program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation, at a minimum, of the following:

- a. Permittees which have the authority to enact ordinances or resolutions shall enact such ordinances or resolutions to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State and Local law;
- b. Requirements for construction site owners or operators to implement appropriate erosion and sediment control best management practices;
- c. Requirements for construction site owners or operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that are likely to cause adverse impacts to water quality;
- d. Procedures for site plan review which incorporate consideration of potential water quality impacts;
- e. Procedures for receipt and consideration of information submitted by the public;
- f. Procedures for site inspection and enforcement of control measures.



## 5. Post-Construction Stormwater Management in New Development and Redevelopment Projects

The permittee shall develop, implement, and enforce a program to address post-construction stormwater runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development and implementation, at a minimum of the following:

- a. BMPs to prevent or minimize adverse water quality impacts;
- b. Strategies which include a combination of structural and/or non-structural BMPs appropriate for the municipality;
- c. 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;
- d. Ensure adequate long-term operation and maintenance of BMPs.

## 6. Pollution Prevention/Good Housekeeping for Municipal Operations

The permittee shall develop and implement an operation and maintenance program that includes employee training to prevent and reduce stormwater pollution from municipal operations activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

### B. Stormwater Management Program

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has the Stormwater Management Program (SMP) been developed and implemented?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has the SMP been modified or updated during this reporting period? <b><i>The current SMP for Westwood Hills, effective January 1, 2021, has not been further modified or updated during 2024.</i></b>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If the answer to question 2 above was "yes," has the modified SMP been submitted to KDHE for review? <b><i>The SMP for Westwood Hills (which took effect in 2021) was submitted to KDHE in conjunction with the City's SMP Annual Report for 2020 and has been uploaded to KEIMS.</i></b>

If the answer to item 3 is a "NO," a copy of the updated SMP must be submitted with this annual report. If it is anticipated a measurable goal cannot be met in the next year, the SMP should be modified and submitted to KDHE for review. The modifications may include different BMPs and/or revised goals to avoid being in a position of non-compliance. However, reasonable BMPs with reasonable goals must be implemented, or KDHE may require the permittee to modify the SMP to include additional or better BMPs and/or more reasonable goals.

**C. Total Maximum Daily Load (TMDL) Best Management Practices (BMPs)**

Some permittees are required to implement BMPs to reduce the discharge of listed TMDL regulated pollutants (potentially any or all of the following pollutants – bacteria, nutrients, and sediment)

Please place an “X” in the left boxes to complete the table below.

YES	NO	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Were any BMPs intended to attenuate the discharge of TMDL regulated pollutants implemented? See your permit to determine if TMDL regulated pollutants are listed for the receiving stream affected by your stormwater system.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	List all of the BMPs intended to attenuate the discharge of TMDL regulated pollutants as identified in the SMP and provide the requested information in the following table.

List all the TMDL BMPs as identified in the SMP and provide the requested information in the following table.

**D. TMDL BMP Table**

***The City of Westwood Hills has no TMDLs identified in its MS4 permit.***

***[Remainder of this page intentionally left blank.]***

## E. Stormwater Management Program Requirements (Six Minimum Control Measures)

### 1. Public Education and Outreach (Table)

List all of the public education and outreach BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

#### **Minimum of 7 points required for 2024.**

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P Ed & O – 01	Maintain a stormwater webpage for the permittee.	Maintain the webpage with up-to-date information with all links effective and valid information. Check all links and update website as necessary on a minimum monthly basis. Document monthly checks in log book and indicate changes with logged summaries.	The City launched its new website in December 2021, which website includes a separate stormwater webpage. Although the webpage is updated when needed, monthly checks were not logged during 2024, and so we are not claiming points for his BMP.	0
P Ed & O – 02	Distribute educational materials (either flyers, brochures, catalog mailings, handouts, or e-mails) addressing various pertinent stormwater public education topics.	Number of all flyers, brochures, catalog mailings, handouts, or e-mails distributed in a year shall equal or exceed the most recent U.S. Census Bureau decennial housing units value for the permit area. The applicable U.S. Census housing units value shall be documented, and the number of flyers, brochures, or e-mails distributed shall also be documented. This information and copies of the flyers, brochures, or e-mails shall be retained on file.	In 2024, JoCo SMP provided funding to the K-State Research & Extension Service in Johnson County to produce stormwater educational materials to appear in the “Johnson County Magazine.” A total of 11 educational pieces were included in 4 separate issues of the JoCo Magazine, which is distributed quarterly to all households and many businesses in the County.  Additionally, the City publishes a monthly newsletter which is distributed to all households in the City of Westwood Hills - 175 homes – and posted on the City’s website. In 2024, the City newsletters contained notice of the City’s Stormwater Management Plan and the 2023 SMP Annual Report, with links to both documents (all months); notice about the “Contain the Rain” cost share program (April – October); announcement of Healthy Yards Expo (April); reminder to residents to keep street gutters clean (March – May); information about the Go Green! Environmental Fair (July – October); recycling information resources (January and August); info about volunteer clean-up day on The Green (April & May); information about Plogtober (October); and notice about the city-wide fall leaf pick-up (November).	2

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P Ed & O – 04	Apply notification, placard, covers/hatches with message, or stencil, on stormwater inlets to provide a message similar to “No Dumping – Drains to River”	Apply this notification on at least 10% of all known stormwater inlets in the MS4.	In 2021 and 2022, the City applied “No Dumping – Drains to Stream” markers to all known stormwater inlets in the City. In 2024, we found one inlet with a missing marker and plan to replace the marker in 2025 and also plan to check the remaining condition of other markers.	2
P Ed & O – 05	Post the municipality's MS4 permit and SMP document on either the stormwater web page or the municipal webpage.	The two documents must be posted for at least six months of the year to claim one point.	In addition to the annual report, the City's MS4 permit and the City's Stormwater Management Plan were posted on the stormwater webpage of the City's website for the entire year.	1
P Ed & O – 08	Provide stormwater education for students at a school campus within K-12 (those grades present at the campus) within Johnson County. The training may be limited to the individual campus (local school buildings associated with a single address). This training does not need to be provided to the entire school system, e.g., USD.  Alternately, funding stormwater BMP installations and/or field trips at the school campus will qualify.	Provide or fund an educator or speaker that will reach at least 5% of the K-12 students as normally attend school in the selected school campus.  Alternately, the funding of BMPs at the school campus may provide for any of the following: -> Installation of BMPs at the school -> Stormwater related field trips -> Water quality stream sampling activities -> Construction of Rain gardens on school property -> Rain barrel workshops -> Rain garden workshops	In 2024, JoCo SMP provided funding to Friends of the Kaw (FOTK), Hillsdale WRAPS, Olathe North High School, and Stone Lion Puppet Theater to provide educational services to K-12 students throughout Johnson County.  Public school students living in Westwood Hills attend nearby Indian Hills Middle School, and, during 2024, FOTK presented educational programs to 445 students in the 8 <sup>th</sup> Grade at Indian Hills.	3
P Ed & O – 11	Adopt a public education program to reduce littering.	Install and/or maintain signs to discourage littering. Signs are to be located in areas where littering has been a problem.	The Green in Westwood Hills is the only public green space in the City. A dog waste bag station, with accompanying signage, and trash can are located on The Green and have been well utilized by citizens for several years.	1
P Ed & O – 12	Create a stormwater information brochure to provide to the public at public meetings and/or hearings.	Have multiple copies of the brochure available during at least 10 meetings or hearings open to the public during the year. Provide the brochures to the public at no charge.	Although the City did have stormwater information brochures available at some of its public meetings, we are not sure that the materials were available at 10 meetings during 2024.	0

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P Ed & O – 15	Develop or participate in an ongoing social media program on pertinent stormwater public education topics.	Publish or share social media content on the permittee's social media accounts at least six times per year. Record post topic, the number of impressions and engagement for each post. Include link to permittee's stormwater education website.	The City hopes to develop a social media program on stormwater education topics, but such a program may be difficult to implement and manage with no full time staff. Stormwater and other environmental news is included in each of the City's monthly newsletters that are e-mailed to City residents and others and posted on the City's website.	0
P Ed & O – 16	Operate an information booth at a public event or hold a public event which is intended to improve public understanding of issues related to water quality. The event may be associated with any environmental related issue including but not limited to an environmental expo, earth day, world wetlands day, international day of action for rivers, world fish migration day, world biodiversity day, world oceans day, world cleanup day, world water monitoring day, world rivers day, and America recycles day.	At least an estimated 800 or more individuals must attend the event.	As a small municipality, Westwood Hills relies on JoCo SMP to sponsor and host such public events. The Healthy Yards Expo was held on April 13, 2024, but we do not have information about the number of people in attendance.  The City contributed \$100 to the Go Green Environmental Fair and participated in the Go Green Environmental Fair hosted by several northeast Johnson County cities, with a councilperson serving on the steering committee and several residents volunteering at the event. Although the event was well-attended, we do not believe that 800 or more individuals attended.	0
<b>Total Points Claimed for Public Education and Outreach in 2024</b>				<b>9</b>

**Additional BMP provided within Westwood Hills but not included within the Westwood Hills Stormwater Management Plan:**

P Ed & O – 06	Provide a phone and/or web-based system for public reporting of illicit discharges.	The system must be available to the public for at least six months in a year.	The JoCo DHE maintains a 24/7 pollution response system available to the public for all cities and citizens in Johnson County to report stormwater pollution. In 2024, within Westwood Hills, no pollution events were reported to the JoCo DHE.	2
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**E. Stormwater Management Program Requirements (Six Minimum Control Measures) (CONTINUED)**

2. Public Involvement and Participation (Table)

List all public improvement and participation BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

**Minimum of 6 points required for 2024.**

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P I/P - 02	Establish a citizens advisory committee.	Host the citizens advisory committee meetings twice yearly and receive comments and guidance from the committee regarding the SMP. Retain on file copies of the attendance list and minutes of the meetings.	The City still hopes to establish a citizens advisory committee in the future but has not yet done so due to time constraints.	0
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.	Clean an area which must be equal to or greater than one acre or alternately at least 200 yards of streambank. Alternately, for municipalities with less than 500 population, clean an area which must be equal to or greater than a quarter of an acre or alternately at least 100 feet of streambank.	In honor of Earth Day, on April 20, 2024, Westwood Hills sponsored a community volunteer day for residents to join in cleaning The Green, the City's public space, and the City's streets. Twelve volunteers collected an estimated 10 pounds of trash and yard waste.  Additionally, volunteers with The Green Team worked on other days to maintain The Green and the creek bank. The Green is approximately 1/3 acre in size with an estimated more than 100 feet of the creek running through the space.	3
P I/P - 04	Train either citizen watch groups, homeowner associations (HOAs), or public service groups to recognize illicit discharge activities and communicate observations to appropriate municipal staff.	Provide training or distribute training materials to the group participants at least once annually.	The City has not yet implemented a training materials distribution program.	0

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P I/P - 05	Provide at least two events for residents to engage in cleanup activities and improve water quality in the municipality.	Provide at least two events in streams, streamside parks, areas adjacent to public waterways, and/or other green infrastructure/water resources. These events can be any of the following: Environmental restoration events, stream cleanups, tree plantings, or stream monitoring.	On April 20, 2024, Westwood citizens lead one community volunteer day for residents to join in cleaning The Green, the City's public space, and the City's streets, picking up trash and yard debris. Additionally, members of the Westwood Hills Green Team (a group of citizen volunteers who oversee maintenance and plantings on The Green, the City's public green space) and other volunteers worked multiple days on The Green picking up trash and clearing debris after storms.	3
P I/P - 06	Establish a program to encourage residents to install stormwater treatment best management practices on their property.	Encouragement can include funding, grants, and other financial incentives, trainings and or giveaways. Stormwater treatment BMPs can include rain barrels, rain gardens, native plantings, native trees, cisterns and vegetated swales. Record participation numbers annually.	<p>The JoCo SMP provides financial support to cities to offer the "Contain the Rain" program to their residents. This program offers a 50% cost share for residents to install stormwater treatment BMPs on their properties. In 2024, one Westwood Hills resident participated in this cost share program, receiving \$119.96 in reimbursement.</p> <p>In 2023, the City partnered with JoCo SMP and installed a demonstration rain garden on The Green, the City's public park space. The rain garden is located so as to provide water filtration and incorporates native plantings. The rain garden was maintained by volunteers in 2024.</p>	2
P I/P - 07	Enact either an ordinance, a resolution, or other enforceable requirement that requires pet owners or their keepers to immediately and properly dispose of their pet's solid waste deposited at parks or rest areas	The ordinance or resolution or other enforceable measure shall be enacted, and signs posted, informing the public of their obligation at the park. The installation of a pet waste bag dispenser in the public area qualifies as adequate signage.	Section 2-503 of the City's ordinances requires a pet owner to remove the pet's waste from public or private property not owned by the pet owner. Additionally, several years ago, the City installed a pet waste bag	1

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
	owned by the permittee.		dispenser, with signage, and a trash can on The Green.	
<b>P I/P - 09</b>	Distribute stormwater educational materials to the public within this permit area.  Alternately, the permittee may provide stormwater educational materials, e.g., brochures, flyers, or pamphlets. These materials may address various stormwater topics. For this alternative, these materials may be provided to other nearby municipalities in Johnson County for distribution to the public.	The educational materials, for each topic, which are distributed or supplied must have a value of at least \$50. Topics may be anything related to stormwater including but not limited to clean-up guidance following flooding, discouraging littering, explaining and discouraging illicit discharges to the storm sewers, guidance on constructed BMPs for homeowners (rain gardens, rain barrels, etc.) guidance on area household hazardous waste receiving centers, and guidance on area recycling programs.	During 2024, the City did not distribute brochures or flyers and elected to continue relying on e-mail distribution for dissemination of information to its residents. A listing of the relevant topics mentioned in City newsletters is contained under P Ed & O -02 above.	0
<b>Total Points Claimed for Public Involvement and Participation in 2023</b>				<b>9</b>

**Additional BMP provided within Westwood Hills but not included within the Westwood Hills Stormwater Management Plan:**

<b>P I/P - 08</b>	Provide a monetary donation to a scholarship fund for students pursuing a degree in an environmental program which would qualify them to work in a field which can result in water pollution control.	A \$500 contribution in a year is the minimum acceptable amount to achieve this goal. The donation must be made in the year the points are claimed.	JoCo SMP funded the work of a University of Kansas graduate student to support their studies and research associated with a water quality project. The amount provided in scholarship is \$20,000 between 2021-2024.	2
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**E. SMP Requirements (Six Minimum Control Measures) (Continued)**

3. Illicit Discharge Detection and Elimination

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a program/plan been developed and is it presently implemented to detect and address illicit/prohibited discharges into the MS4?</p> <p>If yes, describe the plan below:</p> <p><b>In September 2017, after consultation with Consolidated Fire District #2 (CFD #2), the City adopted its Spill Response Plan, which was also approved by CFD #2.</b></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a map of the MS4 been developed, showing the location of all outfalls, either pipes or open channel drainage, showing names and location of all streams or lakes receiving discharges from the outfalls? If yes, attach map.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit may require the permittee enact ordinances, or resolutions. Have ordinances, or resolutions, or regulations to prohibit non-stormwater discharges into the storm sewer system been enacted?</p> <p>If yes, list ordinances/resolutions and their effective dates below:</p> <p><b>Ordinance No. 257, Stormwater Pollution Prevention Ordinance, was adopted on July 11, 2016, and became effective upon its publication in THE LEGAL RECORD.</b></p>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Have the ordinances, resolutions, or regulations been modified?</p> <p>If yes, list ordinances/resolutions and their effective dates below:</p> <p><b>N/A</b></p>

List all the Illicit Discharge Detection and Elimination BMPs as identified in the SMP and provide the requested information in the following table.

***[Remainder of this page intentionally left blank.]***

**E. Stormwater Management Program Requirements (Six Minimum Control Measures)**

**3. Illicit Discharge Detection and Elimination (Table)**

List all illicit discharge detection and elimination BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

***Minimum of 7 points required for 2024.***

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
ID D & E - 03	Develop a spill response plan and, if appropriate, coordinate emergency response with other agencies or organizations.	The plan shall include, at a minimum, explanation of appropriate spill response activities for spills associated with vehicle accidents, at grade or above ground storage tanks, and vehicle fluids from mechanical equipment such as construction equipment, cars, or trucks. The written plan shall be maintained on file.	On September 11, 2017, the City adopted a Spill Prevention and Response Plan as recommended by KDHE. Following the recommendation of Consolidated Fire District No. 2, the City prepared a spill response plan that relies on the spill response and haz-mat expertise of CFD2 personnel and equipment.	2
ID D & E - 05	Distribute a letter (or flier) and/or e-mail along with a press release from a municipal official with the intent of reaching every resident and business in the MS4 permit area. The distributed documents shall provide information on how to avoid illicit discharges to the MS4, i.e., proper disposal methods for common substances or materials often discharged illicitly. Provide a link to the municipal website where applicable ordinances and disposal guidance are posted.	The letter (or flier) and/or e-mail along with the press release shall highlight the requirements for proper disposal of wastes and disposal methods. Copies of these documents shall be retained on file along with the distribution/ mailing lists to document distribution to the target area (minimum MS4 permit area) to avoid illicit discharges to the MS4. Provide a link to the municipal website where applicable ordinances and disposal guidance are posted.	During 2024, the City was not able to issue a letter to all residents and businesses within its permit area concerning avoidance of illicit discharges.	0

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
ID D & E - 06	Inspect, by televising pipelines or direct visualization of open channel drainage, 2% of the MS4 system within the permit area all conducted within a 12-month period to aid in identifying illicit discharges as well as evaluate the condition of the storm sewer lines/drainage channels-ditches. If in a 12-month period 10% of the MS4 system is inspected, a higher point value may be claimed.	Generate a summary report of the inspection including the number of linear feet televised, number of linear feet visually inspected, condition comments, illicit discharges identified and the results of efforts to eliminate illicit discharges, e.g., discharge line disconnected and redirected to the sanitary sewer or discharge practice terminated.	In December 2024, the City engaged a contractor to inspect and clean the stormwater inlets located within Westwood Hills and the open channel drainage located by such stormwater inlets. No camera inspections of storm sewer pipelines were conducted in 2024. The City has claimed the points for this inspection work under ID D & E – 10 below. Because we are uncertain whether 2% of the total of pipelines or channel drainage were inspected, the City is not claiming any points for this BMP ID D & E – 06.	0
ID D & E - 07	Implement a Household Hazardous Waste Collection Program (HHWCP) or document others have implemented such a program to provide such service to all property owners or residents located within the permit area.	Document the residents and property owners within the MS4 permit area were able to dispose of such wastes at the HHWCP during a calendar year. Retain this documentation on file.	In 2024, the JoCo SMP provided funding to both the Johnson County Department of Health and Environment and the city of Olathe’s household hazardous waste (HHW) facilities, to ensure that all citizens could utilize these facilities. According to JCSMP information, 21 Westwood Hills residents utilized the JoCo HHW facility in 2024.	3
ID D & E – 09	Provide a contribution to area recycle programs or programs (such as household waste disposal facilities, e-cycle facilities, paper shred facilities, pharmaceutical disposal facilities, etc.) designed to properly dispose of types of waste or materials which have previously been discarded to or adjacent to either the MS4, streams, or lakes within or adjacent to the permittee’s permit area. The area program must be within 30 miles from this permit area.	The contributions may be made to programs which take tires, automotive fluids, batteries, or other wastes for which there is any documentation such wastes have been discarded as addressed under the BMP summary. The contributions must total a minimum of \$500 in the year (\$100 in the year for alternative lower population municipalities) which points are claimed. The contributions can be monetary or can be in the form of goods and/or services with an agreed specified value. Contributions may be made to area household hazardous waste programs, private recycle/reuse facilities or civic/volunteer organizations assisting in recycle.	In 2024, the City of Westwood Hills did not financially sponsor any recycling programs, although the City has done so in past years.  The City did participate in the Go Green Environmental event held at the Sylvester Powell Center in Mission, Kansas, in September 2024 and contributed \$100 to support the event.	0

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
ID D & E - 10	Inspect, 5% of the MS4 system Stormwater inlets and/or outfalls within the permit area all conducted within a 12-month period to aid in identifying illicit discharges. If in a 12-month period 15% of the MS4 system inlets and/or outfalls are inspected a higher point value may be claimed in the year the required percentage of inspections are completed.	Generate a summary report of the inspection including the number of inlets and/or outfalls visually inspected, condition comments, illicit discharges identified and the results of efforts to eliminate illicit discharges, e.g., discharge line disconnected and redirected to the sanitary sewer or discharge practice terminated.	<p>In December 2024, the City engaged a contractor to clean the majority of the stormwater inlets within the City (at least 90% of the stormwater inlets were cleaned and inspected). The contractor did not note any illicit discharges discovered during this cleaning and inspection.</p> <p>Additionally, in 2024, the JoCo SMP initiated a dry weather monitoring. During 2024 in Westwood Hills, JoCo SMP conducted a total of 12 outfall inspections (inspecting approximately 85% of the outfalls in the City).</p>	5
<b>Total Points Claimed for Illicit Discharge Detection and Elimination in 2023</b>				<b>10</b>

***[Remainder of this page intentionally left blank.]***

**E. SMP Requirements (Six Minimum Control Measures) (Continued)**

4. Construction Site Stormwater Runoff Control

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development/redevelopment projects been enacted?</p> <p>If yes, list ordinances/resolutions and their effective dates below:</p> <p><b>Ordinance No. 268, Erosion and Sediment Control, was adopted on December 11, 2017, and became effective upon its publication in THE LEGAL RECORD.</b></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a copy of the ordinances or resolutions been submitted to KDHE as required by the permit?</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure or program been developed requiring construction site owners and/or operators to implement appropriate erosion and sediment control best management practices?</p> <p>If yes, describe plan below:</p> <p><b>In Ordinance No. 291, dated November 8, 2021, the City adopted both APWA 5600 stormwater design criteria and the MARC/APWA BMP Manual to guide construction site owners on required best management practices for stormwater management. Also, Ordinance No. 268 sets out erosion and sediment control requirements for work within the City of Westwood Hills.</b></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure or program been developed requiring construction site owners and/or operators to control waste such as discarded building materials, concrete truck washout, chemicals, paint, litter, and sanitary waste at construction sites likely to cause adverse impacts to water quality?</p> <p>If yes, describe procedure/program below:</p> <p><b>City Ordinance No. 257 specifically prohibits the discharge of truck washout, chemicals, paint, and other hazardous materials into the stormwater system in the City.</b></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a procedure been developed and implemented requiring site plan review which includes consideration of potential water quality impacts?</p> <p>If yes, describe procedure below:</p> <p><b>Although the City is fully built out with no development or redevelopment sites in excess of one acre, by its Ordinance No. 291, the City has adopted both APWA 5600 stormwater design criteria and the MARC/APWA BMP</b></p>

			<b>Manual. The Building Official will apply those criteria to any projects subject to those provisions in the permit review process.</b>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed for the receipt and consideration of information submitted by the public? If yes, describe procedure below:
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a procedure been developed and implemented for construction site inspection and enforcement of the control measures? If yes, describe procedure below: <b>Ordinance No. 268 contains specific provisions for construction site inspections (Section 5-721).</b>

List all the construction site stormwater runoff control BMPs as identified in the SMP and provide the requested information in the following table.

*[Remainder of this page intentionally left blank.]*

## E. Stormwater Management Program Requirements (Six Minimum Control Measures)

### 4. Construction Site Stormwater Runoff Control (Table)

List all Site Stormwater Runoff Control BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

**Minimum of 6 points required for 2024.**

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
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.	Enact a regulatory ordinance, or other enforceable measure that requires an SESC Plan for all developments disturbing 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.	On December 11, 2017, City Council adopted Ordinance No. 268, Erosion and Sediment Control Act.	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.	Require implementation of BMPs in compliance with the design manual on all sites which meet the disturbed area standard as specified in the BMP Summary.	As a fully developed residential city, no sites within Westwood Hills equal to or greater than one acre remain to be developed. As time permits in the future, the City may develop a design manual for erosion and sediment control which would apply to smaller construction projects. The City has adopted the APWA 5600 standards and the MARC BMP Manual, which are currently under the revision process, but which do contain erosion and sediment control BMPs. The City is participating in the APWA 5600 revision process. In 2024, Westwood Hills experienced no construction activity which would be subject to the APWA 5600 standards or the BMP Manual.	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	This training class must address all local requirements for a SWP2 Plan, requirements for implementation of BMPs, and the requirements for permits.	During 2024, the JoCo SMP did not hold any trainings for contractors through the Johnson County Contractor Licensing Office.	0

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
	requirements for a Stormwater Pollution Prevention Plan (SWP2 Plan) and implementation of appropriate BMPs.			
<b>CS SR C - 04</b>	Develop a site plan review process which considers potential water quality impacts which may occur during construction as well as post construction impacts.	Review process must have written guidance for the reviewer. Issuance of a building permit or approval to start construction may not be provided until the site plan has successfully passed the review process either based on the initial site plan submittal or site plan modified to comply with requirements identified during the review process. Measures must be included to enforce the installation of water quality BMPs included in the site plan.	With construction in Westwood Hills being primarily renovations and small additions, the need for this formal site plan review process is limited. During the building permit application process, the City Building Official and/or Planning Commission does review the proposed work for compliance with the City's ordinances, including the lot coverage ratio limiting impervious surfaces and the impact on surrounding property owners.	0
<b>CS SR C - 05</b>	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.	Enact ordinance or other effective means to achieve control of wastes at construction sites.	On July 11, 2016, the City Council adopted Ordinance No. 257, Stormwater Pollution Prevention for Storm Sewers and Surface Waters.	2
<b>CS SR C - 06</b>	Develop written procedures for inspection of construction sites. Develop a Stormwater Construction Site Inspection Guide for use by municipal inspectors.	The procedures document must address the administrative aspects associated with required inspections of construction sites, including the issuance of inspection reports, notices of violations, and enforcement actions. The Inspection Guide must provide inspectors guidance on how to conduct a construction site stormwater inspection; outline the required procedures; provide guidance on acceptable conditions of various BMPs employed on such sites, enforcement actions and/or reference of cases for enforcement by other municipal staff; and provide inspection checklists for use by the inspector and guidance on creating a photo log of the inspection.	The City's Building Official inspects the building projects within the City of Westwood Hills, which projects are mostly remodeling projects, renovation work, or small additions. With no development or redevelopment sites in excess of one acre in size, the City has not yet adopted a formal Inspection Guide which incorporates stormwater inspection guidelines.	0
<b>Total Points Claimed for Construction Site Stormwater Runoff Control in 2024</b>				<b>6</b>



### E. SMP Requirements (Six Minimum Control Measures) (Continued)

#### 5. Post-Construction Site Stormwater Management in New Development and Redevelopment

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The permit requires the permittee, if they have such authority, to enact ordinances or resolutions. Have ordinances or resolutions to address construction site runoff from new development and redevelopment projects been enacted?</p> <p>If yes, list ordinances/resolutions and their effective dates below:</p> <p><b>Ordinance No. 268, Erosion and Sediment Control, was adopted on December 11, 2017, and became effective upon its publication in THE LEGAL RECORD.</b></p> <p><b>Ordinance No. 291, adopting the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual, was adopted on November 8, 2021, and became effective upon its publication in THE LEGAL RECORD.</b></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has a copy of the ordinances or resolutions been submitted to KDHE as required by the permit?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Has a post-construction stormwater runoff program been implemented?</p> <p>If yes, describe the program below:</p> <p><b>Although the City is fully built out and has no development or redevelopment sites in excess of one acre in size, the City will follow the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual for any projects in excess of one acre in size.</b></p>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Have post-construction sites been inspected? (None inspected to date)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are BMPs specified to minimize adverse water quality impacts?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Have strategies been developed to include a combination of structural and/or non-structural BMP appropriate for the municipality?
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Have measures been implemented to ensure adequate long-term operation and maintenance of structural BMPs?</p> <p>If yes, describe measures below:</p> <p><b>To date, no structural BMPs have been installed by contractors on private lands, and so the City has had no need for long-term operation and maintenance requirements.</b></p>

List all the post-construction site stormwater management in new development and redevelopment BMPs as identified in the SMP and provide the requested information in the following table.

## E. Stormwater Management Program Requirements (Six Minimum Control Measures)

### 5. Post-Construction Site Stormwater Runoff Control (Table)

List all post-construction site stormwater runoff BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 7 points.

**Minimum of 7 points required for 2024.**

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P-C SM - 01	<p>Develop and adopt a custom design manual for Post-Construction Stormwater Management which specifies various structural BMPs which are required for new development and re-development construction sites which are greater than 1 acre 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.</p> <p>Alternately, adopt and implement the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual.</p>	<p>The custom design manual shall impose requirements to achieve at least one of the following standards:</p> <ul style="list-style-type: none"> <li>-&gt; Capture, at least, the first 0.5 inches of precipitation on the development/re-development site and utilize methods to prevent discharge off-site, including but not limited to: <ul style="list-style-type: none"> <li>Retain on-site</li> <li>Infiltrate</li> <li>Evaporate</li> <li>Transpire</li> <li>Or beneficially reuse</li> </ul> </li> <li>-&gt; Through implementation of appropriate BMP(s) reduce the peak stormwater flow rate to a value equal to or less than the rate which would be experienced on the site prior to the development/re-development project based upon modeling a standard storm event, e.g., 1.0 inch- 6-hour event assuming saturated soil conditions.</li> <li>-&gt; Other sizing or detention standards generally accepted by design engineers as adequate for the permittee's locale.</li> </ul> <p>As an alternative to a custom design manual, the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual may be adopted and implemented. Measures must be included to enforce the installation of the various structural BMPs required.</p>	<p>On November 8, 2021, the City Council adopted Ordinance No. 291, by which it adopted the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual.</p> <p>Additionally, the City is currently participating in a metro-wide effort to review and revise as necessary the APWA 5600 standards and the MARC/APWA BMP Manual.</p>	5
P-C SM - 02	<p>Develop a list of post-construction structural or nonstructural BMPs which are required to be incorporated in any development/redevelopment project. The list must include guidance regarding the BMPs which must be incorporated in various projects as determined appropriate by the permittee. The list is to be provided to entities involved with the design of projects prior to site plan review by the permittee.</p>	<p>Development and implementation of the list and guidance is necessary to claim points in the first year. The list of required BMPs must be enforceable through ordinance or other means.</p>	<p>With no anticipated development or redevelopment projects impacting an area in excess of one acre, the City has not yet adopted a specific list of post-construction BMPs which are required. Rather, the City is relying on the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual to provide guidance in such situations if they arise in the future. The City is also participating in the review and revision process for APWA 5600 Standards and the BMP Manual.</p>	0

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P-C SM - 07	Enact either an ordinance, a resolution, or other enforceable requirement which requires the installation of pervious surfaces on property.	The ordinance or resolution or other enforceable requirement must specify when installation of impervious surfaces is not acceptable and what allowable pervious surfaces can be installed in lieu of impervious surfaces.	Section 8-203 of the City's ordinances sets lot coverage ratios that limit impervious surfaces on lots to a maximum of 50% of the total lot area. Additionally, the APWA 5600 Stormwater Design Criteria and the MARC/APWA BMP Manual require new design projects to include pervious surfaces to control runoff.	2
P-C SM - 08	Implement a program to encourage residential owners to install stormwater BMPs, including but not limited to, native trees, native flower gardens, rain gardens, rain barrels, pervious surfaces, and vegetated swales.	A program which results in installation of such BMPs on 1% of the residential parcels in a year will allow two points to be claimed for that year. In a year when installation of such BMPs on 5% of the residential parcels occurs, a larger number of points may be claimed.	<p>With financial assistance from JCSMP, in 2024, the City once again offered its residents the opportunity to participate in the "Contain the Rain JoCo" cost share program. Residents are encouraged to apply to the program and receive a 50% cost share reimbursement for planting of native trees and native flower gardens as well as for installation of rain barrels and pervious surfaces. In 2024, one household in Westwood Hills participated in this cost share program. Unfortunately, the City did not meet the 1% threshold for claiming points.</p> <p>Last year (2023), the City also partnered with JCSMP to install a rain garden on The Green in the City. This rain garden incorporates native plants and provides water filtration, while serving as an example to residents of what they might install on their property.</p>	0
<b>Total Points Claimed for Post Construction Stormwater Management in 2024</b>				<b>7</b>

**E. SMP Requirements (Six Minimum Control Measures) (Continued)**

6. Municipal Pollution Prevention/Housekeeping

Please place an "X" in the left boxes to complete the table below.

YES	NO	N/A	
☒	☐	☐	<p>The permit requires the permittee to enact a program to address pollution prevention/good housekeeping for Municipal Operations. Has such a program been enacted?</p> <p>If yes, describe program below:</p> <p><b>The City does not have a municipal department but does request that its landscape contractor use as little fertilizer as possible and always use fertilizers in accordance with manufacturer’s instructions. For public works services, the City contracts with the City of Westwood and relies on the City of Westwood to address pollution prevention/good housekeeping processes. When the City contracts with a third party for street sweeping services, the City requires that any street sweeping debris be disposed of properly.</b></p>

List all the municipal pollution prevention/housekeeping BMPs as identified in the SMP and provide the requested information in the following table.

*[Remainder of this page intentionally left blank.]*

**E. Stormwater Management Program Requirements (Six Minimum Control Measures) (CONTINUED)**

6. Municipal Pollution Prevention/Housekeeping (Table)

List all municipal pollution prevention/housekeeping BMPs as identified in the SMP and provide the requested information in the following table. The BMPs listed in the below table should add up to a minimum of 6 points.

**Minimum of 6 points required for 2024.**

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
P P/G H – 02	Implement a recycle and proper waste disposal program for municipal staff to reduce potential for litter, to recycle waste oil, batteries, glass containers, plastic containers, and paper products.	A log of the materials directed to recycle shall be maintained. Entries in the log shall record either weight or volume of recycle materials removed from the containers and transported to the recycle facility as well as the date of transport.	The City of Westwood Hills has only one part time staff member (the City Clerk) who works from her home. This BMP is proving to be somewhat problematic to implement as curbside recycling is available for all residents within the City. Requiring the City Clerk to segregate and weigh City materials being recycled and maintain a log of the same seems over-burdensome and inefficient. The City Clerk does recycle city materials (office paper, etc.) – intermingled with rather than separated from her own household curbside recycling materials.	0
P P/G H – 03	Develop a guidance document for municipal staff or third-party contractors which apply pesticides. The guidance shall require any municipal staff, who apply restricted use pesticides, to have a commercial applicator certification from the Kansas Department of Agriculture if required by that Department.	Require staff which apply pesticides to use such pesticides in compliance with the guidance document. The guidance document must require use of pesticides in compliance with the label instructions.	The City contracts with an independent contractor to provide landscaping services for the City's public spaces. We hope to develop a formal pesticide guidance document in the near future, but currently the independent contractor is encouraged to use minimal pesticides within the City.	0
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.	All paved streets which can be swept shall be listed in the schedule for street sweeping. A log shall be maintained listing the street segments which are swept and, dates of sweeping and where the street sweepings are disposed or where the material was sent to be recycled and/or reused. Alternatively, for municipalities with less than 500 population, street sweeping can be limited to sweeping the gutters. The log which must be maintained need only indicate the street segments which were swept in the year and confirm the sweepings were properly disposed or recycled and/or reused	In December of 2024, the City engaged a contractor to sweep all the streets within the City of Westwood Hills. This street sweeping occurred after a city-wide leaf collection on December 8, 2024. The City requested that the contractor properly dispose of all street sweepings.	2

BMP ID Number	BMP Summary	Measurable Goal(s)	Progress Achieving Goal(s) (Measured Result)	Points Claimed
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.	Provide guidance documents in the form of fact sheets, flyers, or e-mails to staff to coach them in appropriate actions they can take while working to minimize stormwater pollution. Alternately, provide in-person training or videos with sign-in- sheets for signature documentation of personal or video training. Retain copies of the guidance documents and/or sign-in-sheets. A log of when the guidance was distributed, or training was provided to staff, should be maintained. Provide appropriate guidance and/or training to staff a minimum of twice per year.	Although the City has only one part-time employee, we are considering including some training to minimize stormwater pollution as a topic on the agenda for upcoming City Council meetings.	0
P P/G H - 07	Implement a program to inspect stormwater inlets to identify illicit discharges and clean drop inlets of accumulated debris.	Inspect at least 5% of all inlets annually.  Additionally, if 10% of all inlets are inspected in a year, an additional point may be claimed.  For any inlets which have evidence of dumped paint, oil or other substances which are considered illicit discharges, follow up with efforts to educate individuals near the impacted inlet about illicit discharges.  For inlets which have any accumulation of debris, remove the debris for proper disposal.	In December 2024, the City engaged a contractor to inspect and clean the stormwater inlets within the City. At least 90% of the stormwater inlets within the City were inspected and cleaned. The debris that was removed was almost entirely organic material, as evidenced by before and after photos taken by the contractor. No illicit discharges were noted.	2
P P/G H - 08	Develop, implement, and keep updated an online storm sewer map accessible to the public.	Map shall cover the entire MS4 within the permit area and include all the MS4 lines both pipe and open drainage (i.e., ditches) and shall also illustrate all impaired waterways (i.e., 303(d) listed and TMDL listed streams/rivers) with an indication of the listed impairment.	Throughout all of 2024, the City's storm sewer map of the MS4 was posted on the City's website, which is accessible to the public.  Additionally, the Johnson County Automated Information Mapping System ( <a href="https://aims.jocogov.org/">https://aims.jocogov.org/</a> ) is a publicly available mapping system showing the MS4 lines and TMDL listed streams for all municipalities in Johnson County.	2
<b>Total Points Claimed for Municipal Pollution Prevention/Housekeeping in 2024</b>				<b>6</b>

**E. SMP Requirements (Six Minimum Control Measures) (Continued)**

**7. PHASE ONE OPERATORS ONLY:** Monitoring Industrial and High-Risk Runoff

The permit requires the permittee to enact a program to address post-construction site stormwater runoff from new development and redevelopment.

Please place an “X” in the left boxes to complete the table below.

YES	NO	N/A	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Has the permittee developed and maintained a list of the municipal industrial facilities contributing to the pollutant loading to the MS4?
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Have at least two municipal industrial facilities on the list had inspection and sampling conducted? If yes, list inspected facilities and the results of the inspections below:
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If the answer to items 1 and 2 is “No,” provide a statement. <hr/> <hr/> <hr/>

**The City of Westwood Hills is not a Phase One Operator.**

**F. Recordkeeping and Reporting**

**The permit for the City of Westwood Hills, Kansas, does not include any TMDL monitoring requirements.**

*[Remainder of this page intentionally left blank.]*

**Certification**

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

**Signature of Permittee:** Rosemary Podrebarac **Date Signed** February 28, 2025

**(Legally responsible person)**

**Name Printed:** Rosemary Podrebarac **Title:** Mayor of Westwood Hills, Kansas

**40 CFR 122.22 Signatories to permit applications and reports.**

(a) Application. All permit applications shall be signed by either a principal executive officer or ranking elected official.

All reports required by permits, and other information requested by the Director shall be signed by a person described in paragraph (a) of this section, or by a duly authorized representative of that person.

Please note the submission requirements on page 1. Submit this report to:

**KANSAS DEPARTMENT OF HEALTH & ENVIRONMENT**

Municipal Programs Unit

1000 SW Jackson Street, Suite 420

Topeka, Kansas 66612

[KDHE.MS4@ks.gov](mailto:KDHE.MS4@ks.gov)