



LEE'S SUMMIT MISSOURI

October 2024

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Stormwater Management Program 2024 Annual Update

Background

The National Pollutant Discharge Elimination System (NPDES) permit program was created in 1972 by the Clean Water Act (CWA). The CWA is intended to promote and improve water quality by regulating the discharge of pollutants into waters of the United States. Under the CWA, the Environmental Protection Agency (EPA) authorizes state governments to permit, administer, and enforce the NPDES program while the EPA maintains oversight authority.

NPDES Permit

In accordance with the CWA, the Missouri Department of Natural Resources (MDNR) has assigned an NPDES permit to the City of Lee's Summit for the regulation of discharges to the City's Municipal Separate Storm Sewer System (MS4). By virtue of the CWA, the City must comply with the requirements of the NPDES program, which includes development of a Stormwater Management Program and Stormwater Management Plan.

The NPDES permit is renewed on a 5-year cycle. The most recent permit was renewed on December 1, 2021. The Stormwater Management Plan is required to be reviewed annually by staff and an update of the Stormwater Management Program is required to be provided annually to the City Council.

Stormwater Management Plan

The Public Works Department is responsible for maintaining the City's NPDES permit and associated Stormwater Management Program. The requirements for the Stormwater Management Plan are outlined in the City's NPDES permit and include the following six Minimum Control Measures (MCMs):

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

The Public Works Department is primarily responsible for the requirements of MCMs 1, 2, 3, and 6 of the Stormwater Management Plan. The Public Works Department shares responsibility for the requirements of MCM 4 with the Development Services Department and the Development Services Department is primarily responsible for the requirements of MCM 5.

These MCMs involve preparing and sharing educational materials for target audiences, which include residents, businesses, and developers; public participation events such as Stream Team and Storm Drain Stenciling; identifying improper disposal or management of wastes, on-site inspections and enforcement of erosion control and construction wastes, inspections of long-term water quality management, and staff training. Each of these MCMs have an iterative process that requires the City to evaluate how well the City is achieving the desired outcome and to adjust the program accordingly to enhance the results.

During the 2024 calendar year, City staff has completed, or has planned, the following permit-required activities:

- Stream Team (litter collection in local streams) with volunteer residents, students, and Scout groups
- watershed and outfall map update
- social media posts regarding stormwater quality for residents and businesses
- mailing of nearly 400 educational letters to developers and local mechanics regarding water quality efforts related to their respective businesses
- stormwater outfalls inspections in the City (12% of all known outfalls)
- dry weather field screening for priority areas and several CIP projects, including Colbern Road, Chipman Road, Green Street, and several stormwater projects that have the potential for impacts to nearby bodies of water
- internal stormwater quality training to field staff in four departments
- finalized the required private stormwater Best Management Practices (BMP) inspection and maintenance program, including required ordinance changes and enforcement strategies related to the BMP inspection and maintenance program to ensure they function with existing methods and software.

Interest in the Storm Drain Stenciling Program has dropped off significantly. Staff is working on finding an alternative outreach and education effort to replace it.