



**Nebraska H2O**  
**Stormwater Management Plan**  
**(SWMP)**

**NPDES Stormwater Discharge Authorization Number NER310003**

**Issued July 1, 2017**

**Revised April 1, 2024**

## MCM 1 & 2 - PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT

### PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT - DECISION PROCESS AND RATIONALE

This MS4 **Public Education and Outreach (PEO) Strategy** is a targeted approach to delivering education, training and public involvement and is tailored to target audiences and groups of individuals that may influence stormwater quality associated with municipal stormwater runoff. The City can have a significant influence on the education and training provided to youth, residents, and businesses by delivering public education and outreach activities. By focusing on the target audiences described in this PEO Strategy, the City can best develop awareness of stormwater BMPs, increase knowledge about recommended and required BMPs, and develop skills for correctly implementing BMPs.

**PEO Strategy Goal 1:** Educate and train the public, specifically municipal staff, to follow recommended and required BMPs; the steps the target audience can take to reduce stormwater pollution.

**PEO Strategy Goal 2:** Use a combination of appropriate strategies to reach target audiences that can implement stormwater BMPs.

1. **PEO Strategy Goal 3:** Inform the public about how to participate in environmental stewardship opportunities, review the SWMP and report about illicit discharges and other municipal stormwater pollution concerns.

**PEO Strategy BMPs:** The PEO Strategy Goals are supported by the PEO Strategy BMPs described throughout the SWMP. The following PEO Strategy BMPs provide details about how the City of Lexington accomplishes PEO Strategy Goals.

**BMP 1.1** Develop, maintain and distribute stormwater education materials that are tailored, current and relevant to the SWMP.

**BMP 1.2** Facilitate citizen participation opportunities for implementation of stormwater controls that protect receiving waters.

**BMP 1.3** Maintain public review, comment and input resources that support the SWMP.

**BMP 3.4** Deliver education about the impact of illicit discharges, common types of illicit discharges, and response procedures when illicit discharges are identified.

**BMP 4.4** Deliver education about the impact of construction-related stormwater pollution, construction site erosion, sediment and good housekeeping BMPs, inspection and enforcement requirements.

**BMP 6.4** Deliver education about impact of municipal maintenance activities and maintenance facility operation on stormwater, operation BMPs, inspection and compliance requirements.

**PEO Strategy Defining Activities:** The PEO Strategy BMPs are all defined by a set of materials and efforts that the City maintains. SWMP tables define each BMP with descriptions, target audiences, messages, methods/resources, and dates materials were last provided and when they are next due. The defining activity tables follow the same general format shown below.

Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
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**PEO Strategy Implementation Activities:** The PEO Strategy BMPS are measured by a set of goals that the City implements. SWMP tables list the goals for the activity, a measure for evaluation and assessment, and the reporting for annual performance that is compared against the evaluation and assessment targets. The implementation tables follow the same general format shown below.

GOALS:	EVALUATION AND ASSESSMENT:	ANNUAL PERFORMANCE:
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The City of Lexington has identified the following target audiences for the education and outreach program that are likely to have stormwater quality impacts: homeowners, pet owners, commercial & industrial businesses, construction site operators, and engineers/architects/developers/realtors. These target audiences were chosen due to the impact of their activities and their availability to be reached. These target audiences have been designated to address different types of non-point source pollution through the Public Education and Outreach program. Household hazardous wastes, pet waste, oil and other fluids from automobiles, and grass clippings are examples of high priority, community-wide pollutant issues.

The City of Lexington education and outreach program will use an array of formats to reach the public. The City will use stormwater pamphlets, social media, press releases, and newspaper articles. This reaches all age groups and genders using these various media platforms. The City of Lexington Development Services Department has a website and an email address on the City's webpage.

The City of Lexington will actively involve the public in the development and implementation of the Stormwater Management Program by providing public notices when updating ordinances pertaining to the City of Lexington Stormwater Management Program. City Council meetings and Planning Commission meetings will allow the public to ask questions and give comments prior to the approval of any city ordinance changes.

The City of Lexington will actively approach any group regardless of ethnicity or economic status as it pertains to stormwater pollution. Pollutant source identification is the key component of the City's Stormwater Management Program. Any group, whether industrial, trade, environmental, or educational, is approachable.

The City of Lexington Development Services Director is responsible for overall management and implementation of the City's education and outreach program. The Development Services Director can be found at the City Hall and reached at 308-324-2341 ext. 1112.

The City of Lexington will evaluate the success of the education and outreach program by implementing effectiveness measures for each BMP that will be met and acknowledged for each reporting period, as outlined in this Plan and Annual Report.

MCM1 & 2: BMP 1: DEVELOP, MAINTAIN AND DISTRIBUTE CURRENT EDUCATION MATERIALS

1.1.1. Coordinate the Public Education and Outreach Strategy with updates and maintenance of general stormwater education or outreach materials for distribution to residential, construction, industrial and commercial sources identified as high priority, community-wide issues related to the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

The PEO Strategy identifies the following:

- Goals, objectives, target messages, and audiences for information.
- Resources used and frequency for distributing information.

Reference:				Frequency:	
The City of Lexington PEO Strategy				Annually	
Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
Online Websites	General Public	Basic Stormwater Protection Awareness – Stormwater Program Management and BMP topics	City of Lexington Website	2023	2024
Social Media	General Public	Basic Stormwater Protection Awareness – Stormwater Program Management and BMP topics	City of Lexington Facebook	2023	2024
Internet Advertisements	General Public	Basic Stormwater Protection Awareness – Stormwater Program Management and BMP topics	Lexington “City Happenings” Newsletter	2023	2023
Storm Drain Awareness	General Public	<del>Basic Stormwater Protection Awareness – Prevent pollution by keeping water draining to inlets, streams and lakes clean</del>	<del>Storm Drain Design Standard</del> Storm Drain Adhesive Markers	2023- MOVE TO MCM 6	
Branded Materials	General Public	Basic Stormwater Protection Awareness – Prevent pollution by keeping water draining to inlets, streams and lakes clean	Distribute materials by personal interaction and mail	2023	2024
Report: Observations, recommendations, and/or changes made to program defining documents during permit year: We will no longer use radio and television PSA’s. Storm Drain marking will be moved to MCM 6.					
We will not make any changes in 2024.					

1.1.2 Distribute general stormwater education or outreach materials related to the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

Reference:	Public Education and Outreach Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	Ongoing Annually
Goals:	Evaluation and Assessment:		Performance:
<b>ADMINISTRATIVE:</b> Use stormwater program management website	Current		Yes
<b>EFFECTIVENESS:</b> Use of Social Media for stormwater program management and BMP information	A goal of 6 per year		Yes
<b>EFFECTIVENESS:</b> Use of Internet Advertisements for stormwater awareness	A goal of 4 per year		Yes
<b>EFFECTIVENESS:</b> Use of Stormwater program-branded materials for stormwater awareness to visitors at various tours, events, trainings, and activities	A goal of 200 interactions with the public; general citizens, contractor and staff interactions		Yes
We will not make any changes in 2024			

MCM 1 & 2: BMP 2: CITIZEN PARTICIPATION IN IMPLEMENTATION OF STORMWATER CONTROLS

1.2.1 Coordinate the Public Education and Outreach Strategy with updates and maintenance of opportunities for citizens to participate in the implementation of stormwater controls, raising awareness for the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff. The Strategy includes for these opportunities and events:

- Goals, objectives, target messages and audiences
- Resources used and frequency

Reference:				Frequency:	
The City of Lexington PEO Strategy				Annually	
Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
Clean-up Day	General Public	Provide community awareness of impacts of pollution to local waterbodies	Coordination with organization	2023	2024
Household Hazardous Waste Disposal Day	General Public	Prevent pollution by disposing household hazardous waste properly	Advertise through print and social media	2022	As available
We will work with our local Keep Lexington Beautiful chapter to have events that include both youth and adult participants. We will change the required 1 event to “as available.” We will also remove the storm drain markings portion of this section. There were no Household Hazardous Waste Disposal Days in 2023.					

1.2.2 Provide general stormwater education or outreach tours and events that raise awareness for the impact of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

Reference:	Public Education and Outreach Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	Ongoing Annually
Goals:	Evaluation and Assessment:		Performance:
<b>ADMINISTRATION:</b> Record Stormwater Education & Outreach event	Recorded		Yes
<b>EFFECTIVENESS:</b> General Public attendance at outreach events	Recorded		Yes
<b>EFFECTIVENESS:</b> Citywide household Hazardous Waste Disposal event	<del>1 Event</del> As available		None
We will work with our local Keep Lexington Beautiful chapter to have events that include both youth and adult participants. We will change the required 1 event to "as available." We will also remove the storm drain markings portion of this section.			

MCM 1 & 2: BMP 3: PUBLIC INVOLVEMENT AND PARTICIPATION MATERIALS

1.3.1 Coordinate the Public Education and Outreach Strategy with materials that demonstrate compliance with State and local public notice requirements and involve the public in planning and implementation of programs and activities related to the City of Lexington Stormwater Management Program and NPDES Permit. The PEO Strategy identifies the following:

- Target messages and audiences for public involvement and participation
- Resources used and frequency for providing public involvement and participation

Reference:				Frequency:	
The City of Lexington PEO Strategy Lexington City Code Chapter 12				Annually	
Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
MS4 Permit	General Public	Regulations and Ordinances are available for the public to use and follow for compliance	Available on demand	2023	Annual
Stormwater Management Plan	General Public	Regulations and Ordinances are available for the public to use and follow for compliance	Available on demand	2023	Annual
Stormwater Program Ordinances for: <ul style="list-style-type: none"> <li>• Illicit Discharge Detection and Elimination</li> <li>• Erosion and Sediment Control</li> <li>• Post-Construction Stormwater Treatment</li> </ul>	General Public	Regulations and Ordinances are available for the public to use and follow for compliance	Available on demand	2023	Annual
Formal Comments for Ordinance Adoption and Revision	General Public	Public input helps form public policy and ordinances for protecting water quality	City Council, Public Notices	2023	Annual
We will use the Lexington Planning Commission for public input.					



1.3.2 Provide public involvement and participation opportunities that demonstrate compliance with State and local public notice requirements and involves the public in planning and implementation of programs and activities of the SWMP.

Reference:	Public Education and Outreach Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	Ongoing Annually
Goals:	Evaluation and Assessment:	Performance:	
<b>ADMINISTRATION:</b> Provide program reference documents online and make available to the general public for the following: <ul style="list-style-type: none"> <li>• Municipal Separate Storm Sewer (MS4) Permit</li> <li>• Storm Water Management Plan</li> <li>• Illicit Discharge and Connection Program</li> <li>• Erosion and Sediment Control Program</li> <li>• Post-Construction Stormwater Treatment Program</li> </ul>	2023-Provided	Annual	
<b>ADMINISTRATION:</b> Provide a public forum to receive input about proposed stormwater compliance plans and ordinances.	Meeting minutes are available	Annual	
<b>ADMINISTRATION:</b> Make web form and telephone resources available to the public for submitting requests.	Reporting information available on website	Annual	
<b>EFFECTIVENESS:</b> All proposed changes to regulations and ordinances are posted for review at least one week prior to decision.	Meeting notices are provided	Annual	
<b>EFFECTIVENESS:</b> Coordinate a stormwater committee (or similar group) with community members that receive information about the City of Lexington Stormwater Program, to review and comment on proposed program, policy and ordinance changes as well as make recommendations for program activities included in the SWMP.	Meeting minutes available		
We used the Lexington Planning Commission as the committee. We educated and asked for input on each MCM. No input was given, and no questions were asked.			

## MCM #3 ILLICIT DISCHARGE DETECTION AND ELIMINATION

### ILLICIT DISCHARGE DETECTION AND ELIMINATION DECISION PROCESS AND RATIONALE

The purpose of this MCM is to minimize the effect of illicit discharges within the municipality. An IDDE program is followed and an ordinance has been enacted within the City Code. Dry weather inspections of storm sewer outfalls are performed within the community. Also, a detailed storm sewer map is maintained to track flow of stormwater and identify affected areas from illicit discharges. Finally, the City of Lexington's website allows the public to acknowledge their concerns regarding all forms of stormwater pollution.

The City of Lexington developed a stormwater system map by consolidating all information gathered by City of Lexington staff and other entities. This included all outfall points, inlets, storm sewer pipes, and manhole boxes. Maintenance and upkeep of this stormwater system map is done annually as as-builts and changes to the system occur.

The City of Lexington effectively prohibits illicit discharges with an active IDDE program that is identified in our Municipal Code, complete with an Enforcement Response Plan. The city holds violators accountable by implementing appropriate levels of enforcement, based on the nature and circumstances of the illicit discharge. City Municipal Code Chapter 12 defines and prohibits stormwater discharges.

The City of Lexington plans to ensure the illicit discharge ordinance, procedures, and actions are implemented through proper and consistent education of City employees to recognize illicit discharges, and train employees of the proper contacts to make in response to a discharge or spill incident. The City of Lexington has a protocol with an Enforcement Response Plan that identifies the procedure to follow based on the severity of non-compliance.

The IDDE Program defines protocol for reporting the requirement to investigate trace and remove potential illicit discharges, including illegal dumping or spills. Using appropriate City contact information (via phone or website), a citizen can identify to a responsible party what they saw. The citizen can remain anonymous or be known. The discharge is addressed and tracked until the issue is clean and a party is found responsible.

The City of Lexington informs public employees, businesses, and the general public about the hazards to water quality from illegal discharges and improper disposal of waste through training videos, posters, bulletins, website and press releases. As the IDDE Program continues to develop, additional materials or educational effort would include flyers, additional website content, social media, and providing more presentation materials for training purposes.

The City of Lexington Stormwater Manager is responsible for the overall management and implementation of the IDDE Program and its activities.

The City of Lexington evaluates the success of the IDDE Program through effectiveness measures to be met on a regular basis. The measures are acknowledged at each annual report to show the measure of success for the IDDE Program.

MCM3: BMP 1: DISCHARGE INVESTIGATION AND REMOVAL

3.1.1 Coordinate updates and maintenance of discharge record-keeping, investigation, removal and enforcement information in the MS4 Illicit Discharge Detection and Elimination (IDDE) Program, which references and defines the following:

- State and/or local regulatory mechanism(s) that effectively define allowable non-stormwater discharges and prohibit non-stormwater discharges into the storm sewer system related to illicit discharges (including on-site sewage disposal systems, spills, discharges, connections and dumping).
- Internal spill/dump/discharge/connection procedures, departmental staff responsibilities, contact information (including NDEE for occurrence believed to be an immediate threat to human health or the environment), and equipment used to investigate illicit discharges.
- Enforcement response protocol used to remove illicit discharges that occur within the MS4.
- Data collected, database used, and data export procedures for records of investigation, removal and enforcement efforts, enforcement status and outcomes for illicit discharges.
- Protocol for reporting the requirement to investigate and remove potential illicit discharges that flow into the MS4 from adjacent MS4 operators and property owners.

Reference	Frequency
City of Lexington Code IDDE Program, Chapter 12	Review Annually
Training was completed for outfall inspections.	

3.1.2 Investigate, remove or cause responsible party to remove spills, illegal discharges and illicit connections within and into the MS4.

Reference:	IDDE Program Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
<p>The Tracking form has been developed for City Staff. Any IDDE complaints from outside the organization are fielded by phone call or email and routed to the Development Services Director. Training will be ongoing for IDDE for City Staff; these are the people who see any issues we may have. Videos and documentation have been purchased; videos will be shown to required personnel; police, street and park department staff.</p>			

<b>ADMINISTRATION:</b> Record dates of all notifications of potential illicit discharges, stakeholders involved, investigation and communication efforts, status, and final resolution taken for potential illicit discharges.	<b>GOAL:</b> Record discharge information required.	Yes
<b>EFFECTIVENESS:</b> Initiate investigation of potential illicit discharges and/or contact adjacent MS4 operator within two days of notification.	<b>GOAL:</b> 100%	Not Available
<b>EFFECTIVENESS:</b> Once a source is determined, initiate notification of responsible party of potential illicit discharges within one working day of notification.	<b>GOAL:</b> 100%	Not Available
<b>EFFECTIVENESS:</b> Open records are updated once a week with status and any new information until the issue is resolved.	<b>GOAL:</b> 100%	Not Available
<b>EFFECTIVENESS:</b> Summarize all instances that were closed without resolution including who made determination to close the record and why the instance could not be resolved.	<b>GOAL:</b> Record instances closed without resolution	0
<p>There were no illicit discharge calls into the phone line or email by public or staff.</p>		

MCM 3: BMP 2: DRY WEATHER SCREENING

3.2.1 Coordinate updates and maintenance of Dry Weather Screening Inspection and data collection information in the MS4 Illicit Discharge Detection and Elimination (IDDE) Program, which defines the following:

- Basis for selecting outfall locations used to screen for the presence of illicit discharges to the MS4 considering likelihood of illicit connections or ambient sampling.
- Frequency used to screen major and minor outfalls for the presence of illicit discharges to the MS4.
- Current policies, staff, contact information, equipment, and known impairments or TMDL pollutants of concern used to conduct dry weather screening for the presence of illicit discharges to the MS4.
- Field tests of selected chemical parameters, evaluation methods and sample concentration action levels for pollutants during dry weather screening that trigger determination to investigate flow as a potential illicit discharge to the MS4.
- Data properties collected, geo-database used, illicit discharge identification and tracking database used, and data export procedures for reporting dry weather screening conducted to determine the presence of illicit discharges to the MS4.

Reference	Frequency
IDDE Program Chapter 12	Review Annually
Reviewed	

3.2.2 Conduct Dry Weather Screening Inspections and record all results in the stormwater outfall geodatabase.

Reference:	Dry Weather Screening Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually – Summer or Fall
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Conduct and record outfall inspections in the outfall geodatabase within the calendar year.	<b>GOAL:</b> Input all records.		
<b>EFFECTIVENESS:</b> Screen each major outfall annually	<b>2023</b>	2024	
<b>EFFECTIVENESS:</b> Investigate each minor outfall every three years	<b>2023</b>	2026	
100% of outfalls were inspected, we will move to screening major outfalls annually and minor outfalls every three.			

MCM 3: BMP 3: STORM SEWER SYSTEM MAPPING

3.3.1 Coordinate updates and maintenance of MS4 area maps and stormwater outfall location information in the MS4 Illicit Discharge Detection and Elimination (IDDE) Program, which defines and references the following:

- Internal procedures, frequencies, municipal staff responsibilities, contact information, and equipment used to capture and verify existing and future stormwater outfall location information.
- How outfall locations are described, minimum size of outfall required to be mapped, smaller size outfalls that may be mapped, and justifications for mapping smaller outfalls.
- Sources of information used for the maps listing land use types, waters of the state, outfall locations, storm drain infrastructure, collection system and structural stormwater treatment BMPs.
- Latest version of the outfall map with receiving waters.

Reference	Frequency
IDDE Program Chapter 12 City of Lexington GIS	Review Annually
GIS is updated as the as-built maps become available.	

3.3.2 Maintain map, to the extent required by the permit, of current geographic locations of all stormwater outfalls, the approximate boundary of their drainage area that discharge to State-designated receiving waters in the MS4, dry weather field screening locations, storm drain infrastructure and collection system as well as structural stormwater treatment locations.

Reference:	City of Lexington GIS As-built records, City of Lexington GIS		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:		Measure
<b>ADMINISTRATION:</b> Maintain all outfall attribute updates in geo-database of stormwater outfall information currently available for major and minor outfalls.	<b>GOAL:</b> Maintained.		Yes
<b>EFFECTIVENESS:</b> All outfall, storm drain infrastructure, collection system and storm water treatment geo-reference attributes are updated in the geo-database within one year of new construction or 30 days following routine outfall dry weather screening.	<b>GOAL:</b> 100%		100%
All mapping is kept up to date.			



MCM 3: BMP 4: ILLEGAL DISCHARGE AND IMPROPER WASTE DISPOSAL EDUCATION

3.4.1 Coordinate updates and maintenance of educational and training information for distribution related to the hazards associated with illegal discharges and improper disposal of waste in the Public Education and Outreach Strategy, which establishes the following:

- Training program with at least one target message related to identification and reporting of illicit discharges and connections for a sector of Public Employees involved in Operation and Maintenance activities every reporting year.
- At least one target message and distribution method for a sector of Public Employees not involved in Operation and Maintenance every reporting year.
- At least one target message and distribution method for a sector of Commercial/Industrial Businesses within the MS4 every reporting year.
- At least one target message and distribution method for at least one sector of the General Public within the MS4 every reporting year.

Reference:				Frequency:	
The City of Lexington PEO Strategy				Annual	
Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
Water Quality Brochure: Illicit Discharge Resource & References	Municipal Staff involved with O&M	Identify, report, investigate and remove Illicit Discharges and Connections	Available at O&M Facility	2023	2024
Water Quality Brochure: Household Hazardous Waste	General Public	Prevent pollution by disposing household hazardous waste properly	Downloadable from website. Available at City Hall business counter.	2023	2024
Water Quality Brochure: Pet Waste	General Public	Prevent pollution from pet waste by collecting and disposing it properly	Downloadable from website. Available at City Hall business counter.	2023	2024
Water Quality Brochure: Lawn and Garden Care	General Public	Prevent pollution by controlling lawn and garden waste and chemicals from leaving your property	Downloadable from website. Available at City Hall business counter.	2023	2024
Water Quality Brochure: Automotive Repair	Business Sector: Automotive Repair	Prevent pollution from automotive maintenance activities	Downloadable from website. Distributed to businesses conducting automotive maintenance. Available at City Hall business counter.	2023	2024

Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
Water Quality Brochure: Outdoor Landscaping	Business Sector: Outdoor Landscaping	Prevent pollution from landscape maintenance activities	Downloadable from website. Available at City Hall business counter.	2023	2024
Water Quality Brochure: Restaurants	Business Sector: Restaurants	Prevent pollution from waste materials, oils and grease from restaurants	Downloadable from website. Distributed to restaurants. Available at City Hall business counter.	2023	2024
IDDE training	City staff involved with O&M of the highway environment	Identify, report, and remove illicit discharges and connections	Water Quality Brochure: Illicit Discharge resources & references.	2023	2024
We will continue to develop and issue education materials via our website, mailings, personal contact and advertising. Mailing to automotive businesses were completed 4/2023.					

3.4.2 Distribute information related to the hazards associated with illegal discharges and improper disposal of waste to Public Employees, Businesses and the General Public.

Reference:	Education and Outreach Strategy Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	Ongoing Annually
Goals:	Evaluation and Assessment:		Performance:
<b>ADMINISTRATION:</b> Water Quality brochure for household hazardous waste distributed matches current PEO Strategy.	Material is current		100+
<b>ADMINISTRATION:</b> Water Quality brochure for pet waste distributed matches current PEO Strategy.	Material is current		Yes
<b>ADMINISTRATION:</b> City Employees, who as part of their normal job responsibilities, may come into contact with or observe an illicit discharge or illicit connection to the MS4 completed training.	Number trained		13
<b>EFFECTIVENESS:</b> At least seventy-five percent (75%) of the estimated target audience sector of Business Owners had information made available to them in the reporting year.	75%		75+%
<b>EFFECTIVENESS:</b> At least fifty percent (50%) of the estimated target audience sector of General Public had information made available to them in the reporting year.	50%		50+%
<b>EFFECTIVENESS:</b> All new City employees at maintenance facilities responsible for maintaining MS4 areas, who as part of their normal job responsibilities, may come into contact with or observe an illicit discharge to the MS4, receive training within one year of hire.	100%		100%
<b>EFFECTIVENESS:</b> All City employees at maintenance facilities responsible for maintaining MS4 areas, who as part of their normal job responsibilities, may come into contact with or observe an illicit discharge to the MS4, receive training every three years.	100%		100%
We have a small staff who get training in the form of videos annually. Targets for information brochures in 2023 were automotive businesses. The Street Department was targeted for 2023.			

## MCM #4 CONSTRUCTION STORMWATER MANAGEMENT

### CONSTRUCTION STORMWATER MANAGEMENT DECISION PROCESS AND RATIONALE

The purpose of this MCM is to reduce pollutants in stormwater runoff from construction activities that result in land disturbance. In accordance with NDEE Administrative Code 119.10.002.12D, Nebraska Small MS4 General Permit NER310000 IV.B.3, and City of Lexington Municipal Code, the Construction Stormwater Program includes and adheres to the following elements:

1. Construction Stormwater Ordinance
2. Operator Requirements to Implement Sediment & Erosion Control, Waste, and Stormwater Controls
3. Construction Sediment & Erosion Control and Site Plans
4. Construction Site Inspection and Enforcement Procedures
5. Construction Stormwater Education

Construction Stormwater Design standards meeting the NDEE and NPDES Permit requirements are available on the City website. Construction site operators for sites disturbing one acre or more, or less than one acre if part of a larger common plan of development or sale are required to enact Erosion and Sediment Controls.

The City of Lexington requires erosion and sediment control measures on construction sites via City Code. The ordinance language ensures every construction project within the City Limits requires proper Erosion and Sediment Controls, as well as inspection and evaluation methods.

The City of Lexington has an Enforcement Response Plan (ERP) for the Erosion & Sediment Control Program which defines the level of enforcement based on the level of non-compliance. The ERP was created to address all levels of non-compliance. The City will follow through on issues of non-compliance until resolved. Communication with the violator, can vary from a phone call to a formal notice of violation to enforcement of Civil Penalties.

The City of Lexington has a defined list of pollutants, including solid waste and hazardous materials, which construction site operators are required to manage onsite with Best Management Practices in City Ordinance. Waste materials include construction activity trash from building materials, equipment and vehicle track out, and potential sanitary waste.

The City of Lexington requires an Erosion and Sediment Control plan meeting the NDEE and NPDES Permit requirements for review by City staff. For sites greater than an acre, and those less than an acre but part of a larger common plan of development or sale, a Stormwater Pollution Prevention Plan is required to be followed.

The City of Lexington Stormwater Manager are ultimately responsible for the management and overall implementation of the Construction Stormwater Program. Parts of this program operate outside the regular authority of the Stormwater Manager, specifically the elements of reviewing plans brought in front of the Development Review Team.

The City of Lexington has multiple effectiveness measures implemented to ensure the BMP's are being utilized correctly. Each annual report sent in to the NDEE will address these effectiveness measures and how to interpret them.

**MCM 4: BMP 1: MAINTENANCE, IMPLEMENTATION, AND ENFORCEMENT OF EROSION AND SEDIMENT CONTROL AUTHORITY**

4.1.1 Coordinate maintenance of enforceable authority and escalation procedures in the MS4 Construction Stormwater (CSW) Program Guidance Document, which references local regulatory mechanisms that:

- Defines and enables municipal enforcement.
- Defines and requires construction erosion and sediment control implementation.
- References local regulatory mechanism(s) that effectively defines waste control implementation.
- References local regulatory mechanism(s) that effectively defines and establishes a range of penalty options and when they will be used to ensure compliance.

Reference	Frequency
City Municipal Code Chapter 12, CSW Program	Update: Review: Annually
Report:	Observations, recommendations, and/or changes made to program defining documents during permit year

4.1.2 Conduct procedures to investigate, remove and enforce each instance of construction stormwater non-compliance for observed non-compliance of the municipal code/ordinance.

Reference:	Construction Stormwater Enforcement Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Record dates of all notifications of potential construction stormwater program non-compliance. Record stakeholders involved, investigation efforts, communication efforts, interim steps of enforcement if taken to resolve, and final resolution taken for potential construction stormwater program non-compliance.	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> Initiate investigation of potential construction stormwater program non-compliance within two working days of notification or identification.	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> Open records are updated once a week with status and any new information until the issue is resolved.	<b>GOAL:</b> Total number of instances.	100%	
<p>We have one department who handles all of the construction projects. Lexington is a smaller community with less development than most. We team with developers to help them with construction activities. There were no complaints from the general public any construction site performance. Our Building Inspector is the lead on day-to-day contact with development. <a href="#">Construction reports are available on request.</a></p>			

MCM 4: BMP 2: CONSTRUCTION SITE PLAN REVIEW

4.2.1 The City will coordinate maintenance of site plan review procedures in the MS4 Construction Stormwater (CSW) Program, which references local regulatory mechanisms that define the following:

- Authority to conduct construction site plan reviews for all land development and building projects that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.
- Minimum requirements for site plan submittals to address construction erosion, sediment and waste control best management practices.
- Minimum standards by reference for design of construction erosion, sediment and waste control best management practices.
- Basis for selecting certain sites for site plan review.
- Current policies, staff, contact information and required procedures for construction site plan review.

Reference	Frequency
City Municipal Code Chapter 12, CSW Program	Update: Review: Annually
Our Building Inspector reviews site plans as they become available in the course of the general plan review.	

4.2.2 The City will conduct and record site plan reviews for all land development and building projects that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.

Reference:	Construction Stormwater Plan Review Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Complete construction stormwater site plan review form for every land development and building project that will disturb at least one acre of soil surface alone or as part of a larger common plan of development or sale.	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> Record when construction stormwater site plan submittal requirements were not satisfied and required revision and resubmittal.	<b>GOAL:</b> 100%	0	
We require plans to be created by a professional engineer or a person with experience. We don't receive plans that are not professionally drawn. Development permits are not issued until the plan is reviewed.			



MCM 4: BMP 3: CONSTRUCTION SITE INSPECTIONS

4.3.1 The City will coordinate review and maintenance of site inspection procedures in the MS4 Construction Stormwater (CSW) Program, which references local regulatory mechanisms that define the following:

- Local regulatory mechanism(s) that effectively defines and enables authority to conduct site inspections
- Minimum standards by reference for installation and maintenance of construction erosion, sediment control best management practices.
- Minimum standards by reference for installation and maintenance of waste control best management practices.
- Current policies, staff, contact information, frequency and required procedures for routine municipal inspections of public and private construction projects.
- Minimum required frequency and information for construction operator self-inspections.

Reference	Frequency
City Municipal Code Chapter 12, CSW Program	Update: Review: Annually
Report:	Observations, recommendations, and/or changes made to program defining documents during permit year

4.3.2 Conduct site inspections for construction projects to document construction stormwater installation and maintenance compliance.

Reference:	Construction Stormwater Plan Review Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Record the total number of active construction site inspections conducted during reporting period.	<b>GOAL:</b> Total Number conducted	As requested	
<b>EFFECTIVENESS:</b> Every private building lot and land development received municipal oversight inspection for erosion and sediment control an average of quarterly (routine) during the period of active construction.	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> Every public project with an NPDES permit completes routine stormwater inspections on a frequency required in the permit authorization (routine).	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> All active construction projects that have non-compliance with local construction stormwater requirements receive a follow-up inspection within one week.	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> All information provided from the public about stormwater management of an active construction site leads to an inspection or a documented reason why an inspection was not conducted.	<b>GOAL:</b> 100%	100%	
<b>EFFECTIVENESS:</b> Record soil stabilization conditions and if unresolved non-compliance exist for the project at time of all close-out inspections required before municipal approval is given.	<b>GOAL:</b> 100%	100%	
Our inspectors do routine inspections on all construction inspections. When issues are uncovered the site supervisor and developer are contacted immediately. Those issues will be corrected either by the responsible party or City Staff. Our community must do these type of maintenance activities as a portion of development incentives.			

MCM 4: BMP 4: CONSTRUCTION STORMWATER EDUCATION

4.4.1 Coordinate updates and maintenance of educational and training information for distribution related to impacts of construction stormwater pollution in the Public Education and Outreach Strategy, which references the following:

- Establishment of a training program and distribution method with at least one target message related to Construction Stormwater Program Requirements (i.e., erosion and sediment controls, soil stabilization, dewatering, pollution prevention, prohibited discharges, surface outlets, plan submittal, site inspection, and enforcement) every reporting year.
- Defines training that municipal staff primarily responsible for permitting, plan review, construction site inspections, and enforcement receive.
- Defines the resources used and frequency for distributing information related to construction stormwater pollution.

Reference:				Frequency:	
The City of Lexington PEO Strategy				Annually	
Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
Required Standards	Municipal Staff and Public	Prevent construction-related stormwater pollution by following City policy and standards.	City of Lexington– Construction Stormwater Program and Approved Stormwater Design Manual links available on website, available by request.	2023	2024
Construction Stormwater BMP Pocket Guide	Municipal Staff and Public	Prevent construction-related stormwater pollution by selecting and installing appropriate BMPs.	Downloadable from website. Available at City Hall.	2023	2024
<del>Construction Stormwater Program Presentation</del>	<del>Municipal Staff and Public</del>	<del>Prevent pollution from pet waste by selecting and installing appropriate BMPs.</del>	<del>Live Presentation</del>	<del>New</del>	<del>2018</del>
We are removing the pet waste portion of the BMP. It is not applicable.					

4.4.2 Distribute education and training information related to construction stormwater pollution.

Reference:	Education and Outreach Strategy Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	Ongoing Annually
Goals:	Evaluation and Assessment:	Performance:	
<b>ADMINISTRATION:</b> Construction site operators can obtain information about BMPs and requirements for minimizing pollutants discharged from construction sites each year.	Total number of flash drives	14 in 2023	
<b>EFFECTIVENESS:</b> Distribute training information to all (100%) Municipal Employees responsible for permitting, plan review, construction site inspections, and enforcement.	100%	100%	
<b>EFFECTIVENESS:</b> Target audience sector of Construction Site Operators had educational information made available to them in the reporting year.	100%	100%	
<b>EFFECTIVENESS:</b> Construction Site Operators had training offered during even calendar years.	100%	Offered to: 100%	
We developed a flash drive to distribute to any contractor that applies for a permit that may impact stormwater.			

## MCM #5 POST-CONSTRUCTION STORMWATER MANAGEMENT

### POST-CONSTRUCTION STORMWATER MANAGEMENT DECISION PROCESS AND RATIONALE

The purpose of this MCM is to ensure the quality of water leaving a previously completed construction site remains continuously treated prior to leaving the property. With the implementation of specifically required **Stormwater Treatment Facilities (STF's)** the quality of water will have the best chance of remaining clean prior to entering receiving waters. These STF's will be monitored and maintained based on official Maintenance Agreements signed by the owner and the City.

The City of Lexington requires post-construction stormwater runoff from new development and redevelopment to be treated through different Stormwater Treatment Facilities (STF's). Rain Gardens, Bioswales, Sediment Forebays and Regional Detention Facilities will all be acceptable STF's within the City Limits. These were chosen based on their performance, accessibility, and aesthetics.

The City of Lexington has created an ordinance as it relates to Post-Construction Stormwater. This ordinance refers to a 'Post Construction Stormwater Management Program' and there are penalties of different severity upon non-compliance. These were chosen due to their positioning within the Municipal City Code.

The City of Lexington Post Construction Stormwater Program provides a submittal checklist that describes the required information on each Site for proper selection and completion of a Post-Construction site plan review when applications for construction are submitted for approval. This checklist will be made available online, at the Public Works Department upon the developer's introduction of the plan to the City. Once the proper specifications have been implemented, then the site plans are up for review on a department by department basis. The Stormwater Manager will observe the Post-Construction specifications and site plan.

The City of Lexington will require a series of inspections of the constructed Stormwater Treatment Facilities to insure proper functionality of the Stormwater Treatment Facilities. These inspections will be performed by a licensed engineer in the State of Nebraska prior to completion of the development project. City Ordinance outlines requirements for these STFs to function appropriately in perpetuity.

The prioritization and procedures for inspection and enforcement for Post Construction STFs are identified in the Post-Construction Stormwater Management Program. Enforcement will be conducted through maintenance agreements, and inspections are allowed by the owner whenever the City wishes to perform them.

The City of Lexington Stormwater Manager is responsible for the implementation of the Construction Stormwater Program. It is the Stormwater Manager who creates and inspects the Stormwater Pollution Prevention Plans (SWPPP) for Municipal projects greater than one acre. The Stormwater Manager communicates directly with the developers and contractors as needed to resolve non-compliance.

The City of Lexington has implemented 'Effectiveness Measures,' found throughout the Post Construction Stormwater MCM, to evaluate the success of the Program. These 'Effectiveness Measures' are tabulated each year and identified within each Annual Report submitted to NDEE.

MCM 5: BMP 1: POST-CONSTRUCTION STORMWATER CONTROL AUTHORITY

5.1.1 Coordinate maintenance of enforceable authority and escalation procedures in the MS4 Post-Construction Stormwater (PCSW) Program, which references the following local regulatory mechanism(s) that effectively:

- Defines and enables municipal enforcement for permanent stormwater quality treatment facilities.
- Defines and requires permanent stormwater quality treatment facility implementation for new development and redevelopment projects and the effective date of the requirement.
- Defines and establishes a range of penalty options and when they will be used to ensure compliance.

Reference	Frequency
City of Lexington - City Code	<b>Review:</b> Annually
<b>Report:</b>	Observations, recommendations, and/or changes made to program defining documents during permit year

5.1.2 Conduct enforcement procedures for permanent stormwater treatment facility non-compliance and/or non-compliance.

Reference:	Post-Construction Stormwater Treatment Facility (STF) Enforcement Tracking Site,		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Record responsible party, date enforcement initiated, reason for non-compliance or violation, status, enforcement steps taken to resolve, and final resolution of each instance of potential non-compliance with post-construction stormwater treatment.	<b>GOAL:</b> Total Number of instances recorded.	NA	
<b>EFFECTIVENESS:</b> Initiate enforcement response plan investigation within seven days of identification of potential non-compliance	<b>GOAL:</b> 100%	NA	
<b>EFFECTIVENESS:</b> Open records are updated once a week with current status and any new information until the issue is resolved.	<b>GOAL:</b> 100%	AN	
There are no private STFs in Lexington. All development is completed and maintained by the city.			

MCM 5: BMP 2: STORMWATER TREATMENT PLAN REVIEW

5.2.1 Coordinate maintenance of site plan review procedures in the MS4 Post-Construction Stormwater (PCSW) Program, which references and defines the following:

- Local regulatory mechanism(s) that effectively defines and enables authority to conduct stormwater treatment plan reviews.
- Minimum treatment volume with calculation method, volume treatment design criteria, and stormwater treatment practice design standards by reference for design of permanent stormwater treatment practices.
- Maximum allowable impervious cover by land use zone.
- Minimum requirements for post-construction stormwater treatment plan submittals to satisfy structural and non-structural stormwater treatment standards.

Reference	Frequency
Lexington City Code, PCSW Program Sections 2 and 3, Appendices	<b>Review:</b> Annually
The Post construction program was discussed at the May 2023 Planning Commission meeting.	



5.2.2 Conduct site plan review for stormwater treatment design compliance.

Reference:	Post-Construction Stormwater Treatment Development Review Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:		Measure
<b>ADMINISTRATION:</b> Complete stormwater treatment design review form for every new development and redevelopment project.	<b>GOAL:</b> Recorded		NA
<b>ADMINISTRATION:</b> Record date of STF Certification and as-built record drawings received with all required information including updated STF design tables if field modifications were made.	<b>GOAL:</b> Recorded		NA
<b>EFFECTIVENESS:</b> Record when STF design requirements for new development and redevelopment projects were not satisfied and required revision and resubmittal.	<b>GOAL:</b> Recorded		NA
<b>EFFECTIVENESS:</b> Complete as-built record drawings are received within one year of municipal approval for project completion.	<b>GOAL:</b> 100%		NA
All STFs are designed by City Engineers. There were 2 added STFs in 2023.			

MCM 5: BMP 3: STORMWATER TREATMENT SITE INSPECTIONS

5.3.1 Establish and review site inspection procedures in the MS4 Post-Construction Stormwater (PCSW) Program, which define and reference the following:

- Local regulatory mechanism(s) that effectively defines and enables authority to conduct site inspections.
- Minimum standards by reference for installation and maintenance of stormwater treatment practices.
- Minimum required timing and information for construction operator self-inspections prior to receiving municipal approval constructed STFs.
- Minimum required timing and information for property owner self-inspections following municipal approval of constructed STFs.
- Current policies, staff, contact information, frequency and required procedures for municipal inspections prior to approving STFs constructed for the project.
- Minimum required timing and information for municipal inspections following municipal approval of constructed STFs.

Reference	Frequency
Lexington City Code, PCSW Program	<b>Review:</b> Annually
Report:	Observations, recommendations, and/or changes made to program defining documents during permit year

5.3.2 Conduct site inspections for new development and redevelopment projects to document post-construction stormwater treatment facility (STF) installation and maintenance compliance.

Reference:	Post Construction Stormwater Treatment Facility Inspection Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Record last date of inspection by <u>Municipality</u> for STFs.	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> Record modifications made from design plans, engineer name providing certification, and anticipated date as-built record drawings will be submitted to the City.	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> Always record current condition, maintenance planned, and next anticipated applicant inspection date.	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> Self inspections are submitted by Owner of project within 90-days following municipal approval of completed project.	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> Self inspections are submitted by Owner of project no longer than three years following the previous self-inspection.	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> Always record final constructed condition at time of inspection, observations and on-going municipal inspection frequency before municipal approval is given.	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> Always (100%) record current condition, maintenance planned, and next anticipated applicant inspection date	<b>GOAL:</b> 100%		
<b>EFFECTIVENESS:</b> All information provided from the public about stormwater management of an approved STF leads to an inspection or a documented reason why an inspection was not conducted.	<b>GOAL:</b> 100%		
<p>We have a record keeping system that will be implemented in 2024 when maintenance begins. Any “owner” requirements will be suspended until there is an STF that is privately owned. Maintenance on STFs is currently and has been completed by City Staff. While the City understands the importance of documenting the efforts; the paperwork portion of this MCM often times takes as long as the work performed as maintenance.</p>			

## MCM #6 GOOD HOUSEKEEPING AND POLLUTION PREVENTION

### GOOD HOUSEKEEPING AND POLLUTION PREVENTION DECISION PROCESS AND RATIONALE

The purpose of this MCM is to minimize the effect of the municipality's efforts to the contribution of stormwater pollutants into receiving waters. Operations have been identified that have the greatest likelihood to cause pollution to stormwater runoff. The facilitators of these operations are educated and trained in Standard Operating Procedures for reducing pollutants from entering the storm sewer system.

The City of Lexington is responsible for the stormwater pollution that its municipal operations and maintenance activities create. Pollution Prevention activities and procedures such as training, standard operating procedures, and record-keeping help minimize the affect our actions take on the environment. The Operations Water Quality Guide identifies these implemented processes and can be found at the City of Lexington Public Works Department.

The City of Lexington has different departments that create stormwater pollution. Several formats of training have been given to the members of these departments. Presentations and training videos are given to the employees regarding Stormwater Pollution Prevention. The Operations Water Quality Guide has a description of all training provided to City staff.

The City of Lexington performs many procedures to document our efforts against stormwater pollution from maintenance activities. There are proper standard operating procedures for street sweeping activities for city employees to follow. These policies and procedures are documented in the Operations Water Quality Guide, which can be found at the City of Lexington Public Works Department.

The City of Lexington Stormwater Manager is responsible for the overall management and implementation of the Good Housekeeping and Pollution Prevention Program. It is the responsibility of each Department/Division involved to implement their activities and report to the Stormwater Manager upon enquiry.

The City of Lexington has created and installed 'Effective Measures' throughout the Good Housekeeping and Pollution Prevention MCM. These effectiveness measures are identified for all BMP's and reported as a measurable goal through the process of our Annual Report submitted to NDEE.

MCM 6: BMP 1: MUNICIPAL FACILITY MAINTENANCE ACTIVITIES

6.1.1 Coordinate reviews and updates of municipal facility evaluation and maintenance policy information in the MS4 Operations Environmental Program Guide, defines and describes the following:

- A listing and maps of all MS4 facilities, including storage yards, which are subject to maintenance activity best management practice policies.
- Lists of industrial facilities owned or operated by the City subject to NPDES Industrial Storm Water Discharge Permit with Notice of Intent or certificate of No Exposure for each facility attached.
- High Priority risk assessment policies for municipal maintenance facilities.
- Content and purpose of a Facility Runoff Control Plan developed for high priority municipal maintenance facilities.
- Describes building and grounds, vehicles and equipment (including maintenance, fueling and washing), product materials (including de-icing materials), bulk fluid storage and waste materials (including dredge spoil, accumulated sediments, floatables, debris, salvage products for reuse, and recyclables) best management practice policies for municipal maintenance facilities.
- Current policies, frequency, staff, contact information and required procedures for municipal facility site inspections, and time period for resolving identified maintenance.

Reference	Frequency
Operations Environmental Guide, Section	<b>Review:</b> Annually
<p>Report: Observations, recommendations, and/or changes made to program defining documents during permit year</p>	

6.1.2 Conduct municipal facility maintenance evaluations and record results of maintenance facility activities.

Reference:	Municipal Facility Inspections Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>ADMINISTRATION:</b> Record the total number of facility inspections conducted during reporting period.	<b>GOAL:</b> Recorded.	Yes	
<b>ADMINISTRATION:</b> Record at least one MS4 Oversight inspection per year at each municipal facility with an NPDES Industrial Stormwater Permit authorization.	<b>GOAL:</b> 100%	Begin 2024	
<b>ADMINISTRATION:</b> Record at least one MS4 Facility Evaluation per five years at each municipal facility with an NPDES Industrial Stormwater Permit No Exposure Certification.	<b>GOAL:</b> 100%	Begin 2024	
<b>ADMINISTRATION:</b> Record if corrective actions haven been identified, documented and addressed for every maintenance facility during the reporting period.	<b>GOAL:</b> 100%	Yes	
<b>ADMINISTRATION:</b> Maintain current status of each corrective maintenance identified but not resolved within the recommended 30-day period of time.	<b>GOAL:</b> Record status.	No	
<b>EFFECTIVENESS:</b> Record the dates and inspectors for two (2) inspections per year at each high priority maintenance facility.	<b>GOAL:</b> 100%	2 inspections will begin in 2024	
<b>EFFECTIVENESS:</b> Record the dates and inspectors for one (1) inspection per year at each low priority maintenance facility.	<b>GOAL:</b> 100%	yes	
<b>EFFECTIVENESS:</b> Interim corrective maintenance is implemented when final corrective actions cannot be completed within 30-days of being identified during an inspection or complaint.	<b>GOAL:</b> 100%	0	
<b>EFFECTIVENESS:</b> Summarize the reason(s) corrective maintenance was not resolved.	<b>GOAL:</b> 100%.	0	
We will begin the oversight inspections in 2024. All municipal facilities were inspected in 2023. There was one high priority facility. A runoff control plan was developed in the past. Improvements made were development of a salt storage facility, removal of outdoor pollutants and sweeping being taken to landfill, along with the development of an STF.			

MCM 6: BMP 2: MUNICIPAL ROADWAY/PARKING LOT MAINTENANCE ACTIVITIES

6.2.1 Coordinate updates and maintenance of municipal roadway/parking lot maintenance policy information in the Operations Water Quality Guide, which describes the following:

- Type of roadways (streets, roads, and highways) and which parking lots are impacted by maintenance activity best management practice policies that control floatables and other pollutants to the MS4.
- Current policies, frequencies and/or schedule, staff, equipment, contact information and required procedures for street and parking lot sweeping activities, and equipment calibration.
- Procedures for transportation and disposal of floatables and other pollutants collected as a result of roadway and parking lot maintenance activities.

Reference	Frequency
Operations Environmental Guide, Section ((reference))	<b>Review:</b> Annually
<p data-bbox="186 829 284 861"><b>Report:</b></p> <p data-bbox="186 877 1412 909">Observations, recommendations, and/or changes made to program defining documents during permit year</p>	

6.2.2 Conduct and report municipal roadway and parking lot maintenance

Reference:	Municipal Sweeping Operations Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:		Measure
<b>ADMINISTRATION:</b> Report hours of equipment usage and number of lane miles of streets swept.	<b>GOAL:</b> Recorded		See link
<b>ADMINISTRATION:</b> Report number and dates of parking lots swept.	<b>GOAL:</b> Reported.		Begin annually 2024
<b>EFFECTIVENESS:</b> Verify that all public streets listed on the street maintenance plan were swept at least two times during the year.	<b>GOAL:</b> 100%		Begin annually 2024
<b>EFFECTIVENESS:</b> All parking lots on the parking lot maintenance plan were swept at least once during the year.	<b>GOAL:</b> 100%		Begin annually 2024
<b>EFFECTIVENESS:</b> Report number of instances that non-routine sweeping was requested and the number of sweeping events provided to address a public complaint or internal identification that non-routine street sweeping was needed.	<b>GOAL:</b> 100%		Begin annually 2024
Our normal street sweeping continued in 2023. The new reporting and tracking of streets and parking lots will begin in 2024.			



MCM 6: BMP 3: MUNICIPAL STORM DRAIN SYSTEM MAINTENANCE ACTIVITIES

6.3.1 Coordinate updates and maintenance of municipal storm drain system maintenance policy information in the MS4 Operations Water Quality Guide, which defines and describes the following:

- Procedures for inspecting and cleaning municipally-owned inlets, open channels and other drainage structures for debris.
- Procedure to dispose of materials extracted from inlets so that no stormwater drainage system waste material will re-enter the MS4.
- Procedures to document drainage structure maintenance activity.
- Procedures for inspecting and sweeping municipally-owned streets.
- Procedures to assess existing flood management locations for potential incorporation of water quality protection devices or practices.
- Procedure to dispose of materials swept so that waste material will not re-enter the MS4.
- Procedures to require any contractors hired by the Municipality to perform maintenance activities.

Reference	Frequency
Operations Environmental Guide ((section Reference))	<b>Review:</b> Annually
Reviewed Annually	

6.3.2 Conduct municipal storm drain system maintenance.

Reference:	Municipal Stormwater Operations Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	On-going Annually
Goals:	Report:	Measure	
<b>MUNICIPAL STORM DRAIN INLET MAINTENANCE</b>			
<b>ADMINISTRATION:</b> Report number of storm drains cleaned.	<b>GOAL:</b> Recorded	See link	
<b>EFFECTIVENESS:</b> All storm drain inlets listed on the storm drain system maintenance plan were cleaned once every five (5) years.	<b>GOAL:</b> Maintain as many inlets as possible.	See link	
<b>EFFECTIVENESS:</b> Report number of instances that non-routine storm drain inlet cleaning was requested and the number of storm drain cleaning events provided to address a public information request or internal identification that non-routine storm drain inlet cleaning was needed.	<b>GOAL:</b> As needed	0	
<b>EFFECTIVENESS:</b> Use of storm drain markings for stormwater awareness	A goal of 25 storm drains marked or replaced per year	Yes	
<b>MUNICIPAL STORM DRAIN PIPE MAINTENANCE</b>			
<b>ADMINISTRATION:</b> Report hours of equipment usage and lineal feet of drainage system cleaned.	<b>GOAL:</b> Recorded	See link	
<b>EFFECTIVENESS:</b> All of storm drain pipes listed on the storm drain system maintenance plan were cleaned once every ten (10) years.	<b>GOAL:</b> 100%	See link	
<b>EFFECTIVENESS:</b> Report number of instances that non-routine storm drain pipe cleaning was requested and the number of storm drain pipe cleaning events provided to address a public complaint or internal identification that non-routine storm drain pipe cleaning was needed.	<b>GOAL:</b> As Needed	0	
The City of Lexington Street Department maps their cleaning efforts. Hours of recorded time and feet are not kept. We would request removing these measures.			

MUNICIPAL STORMWATER DETENTION/RETENTION AREA MAINTENANCE		
<b>ADMINISTRATION:</b> Report hours of equipment usage and detention/retention areas cleaned and maintained.	<b>GOAL:</b> Recorded	Hours: {{Number}} Facilities: {{Number}}
<b>EFFECTIVENESS:</b> Verify that all detention/retention areas listed on the storm drain system maintenance plan were cleaned once every ten (10) years.	<b>GOAL:</b> 100%	All retention areas were maintained. Tracking will start in 2024
<b>EFFECTIVENESS:</b> Report number of instances that non-routine detention/retention area cleaning was requested and the number of detention/retention cleaning events provided to address a public complaint or internal identification that non-routine detention/retention cleaning was needed.	<b>GOAL:</b> 100%	0
The City of Lexington owns and maintains all retention and detention areas. Reporting on maintenance will begin in 2024. Maintenance activities will be mapped.		

MCM 6: BMP 4: MUNICIPAL OPERATION AND MAINTENANCE PROGRAM TRAINING

6.4.1 Coordinate updates and maintenance of training materials for distribution related to reducing stormwater pollution from municipal operation and maintenance activities in the Public Education and Outreach Strategy, which defines the following:

- Target messages and distribution methods for pollution prevention or reduction training related to municipal operation and maintenance activities.
- At least one target message for Public Employees involved in Parks and Recreation Operation and Maintenance Activities every reporting year.
- At least one target message for Public Employees involved in Transportation and Utilities Operation and Maintenance Activities every reporting year.
- At least one target message for Public Employees involved in Storm Sewer Operation and Maintenance Activities every reporting year.

Reference:				Frequency:	
The City of Lexington PEO Strategy				Annually	
Description	Target Audience	Messages	Methods/Resources	Last Provided	Next Due
Standard Procedures	City Staff involved with O&M	Prevent pollution from municipal operations throughout the City.	City of Lexington– Operations Water Quality Guide	New	2024
Maintenance Facility Runoff Control Plans	City Staff involved with O&M	Prevent pollution from municipal operations at municipal maintenance facilities.	Three Facility Runoff Control Plans (Street, Water, and Electrical Departments)	2016	2024
Supplemental Guides	City Staff involved with O&M	Prevent pollution from municipal operations at municipal maintenance facilities.	City of Lexington– Municipal Good Housekeeping Poster (located at each FRCP facility)	2016	2024
Municipal Good Housekeeping Training	City Staff involved with O&M	Prevent pollution from municipal operations throughout the City.	Live Training or Video	New	2024
Report:	Observations, recommendations, and/or changes made to Municipal Operations and maintenance program training support materials during permit year				

6.4.2 Deliver training related to pollution prevention and reduction from municipal operation and maintenance activities conducted by Municipal Employees.

Reference:	Education and Outreach Strategy Tracking Site		
Responsible:	Stormwater Coordinator	Frequency:	Ongoing Annually
Goals:	Evaluation and Assessment:		Performance:
<b>ADMINISTRATION:</b> Deliver training to all Municipal Employee sectors identified to receive information for the reporting year.	100%		Yes
<b>EFFECTIVENESS:</b> Management staff for Parks and Open Space, Fleet and Building, Permanent Stormwater Treatment, and Storm Sewer Maintenance and Operation received training every even numbered calendar year.	100%		5
<b>EFFECTIVENESS:</b> Non-management, non-seasonal staff for Parks and Open Space, Fleet and Building, Permanent Stormwater Treatment, and Storm Sewer Maintenance and received training every odd numbered calendar year.	75%		24
<b>EFFECTIVENESS:</b> Seasonal staff for Parks and Open Space, Fleet and Building, Permanent Stormwater Treatment, and Storm Sewer Maintenance and received training every calendar year.	75%		0
Our entire staff of Maintenance Personnel is a total of 30 full-time and part-time employees. There is crossover in all their positions between departments. One training session covers most of the employees. Seasonal employees will be trained in 2024.			

## MS4 PROGRAM SUPPORTING DOCUMENTS

### MCM 1 & 2 - PUBLIC EDUCATION, OUTREACH AND INVOLVEMENT

[Supporting Documents](#)

### MCM #3 ILLICIT DISCHARGE DETECTION AND ELIMINATION

[Supporting Documents](#)

### MCM #4 CONSTRUCTION STORMWATER MANAGEMENT

[Supporting Documents](#)

### MCM #5 POST-CONSTRUCTION STORMWATER MANAGEMENT

[Supporting Documents](#)

### MCM #6 GOOD HOUSEKEEPING AND POLLUTION PREVENTION

[Supporting Documents](#)