



STORMWATER MANAGEMENT PROGRAM (SWMP)

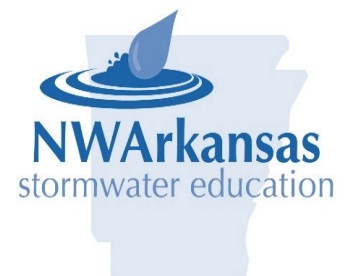
LITTLE FLOCK, AR

2024-2029

(Effective 8/1/24 through 7/31/29)

Permit # ARR040035

AFIN# 88-00855



CREATED IN PARTNERSHIP WITH THE
BENTON AND WASHINGTON COUNTY
COOPERATIVE EXTENSION SERVICES.

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Background and Context:

The City of Little Flock's Stormwater Management Program was developed to provide ordinance and management guidance for activities affecting stormwater throughout the City. It is intended to help the City fulfill certain State and Federal water quality requirements, and to meet local water resource management objectives. Over time, through the implementation of the policies and management practices embodied in the Stormwater Program, Little Flock strives to prevent its urban stormwater quality from negatively impacting local rivers and streams and strives to develop and preserve its urban drainage infrastructure in a manner that meets the community's future needs.

State and Federal regulatory programs place significant emphasis on improving water quality. Therefore, through its code and enforcement actions, Little Flock emphasizes the importance of local resource management of urban stormwater and waterway resources. It is important that the City manage these resources in a manner that minimizes destructive long-term impacts to drainage infrastructure and the natural features that help protect water quality and control flooding.

Permit Explained:

The Clean Water Act (CWA) prohibits the discharging of pollutants through point sources into Waters of the United States unless the entity has a National Pollution Discharge Elimination System (NPDES) permit to discharge. Arkansas, in order to meet the requirements of the CWA, is granted General Permit Number AR40000. This document grants "Authorization to Discharge Under the National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act." Each City required to be permitted in order to discharge must be issued a Permit Tracking Number and an AFIN number. Little Flock's Permit Tracking Number is ARRO40035 and its AFIN is 88-00855. These two numbers are used to specifically identify the City of Little Flock; they should be used on all correspondence with the EPA or ADEQ.

There were two phases of the EPA's stormwater program under the CWA. Phase I occurred in 1990 and addressed NPDES permit coverages of stormwater runoff from medium and large municipal MS4s serving populations of 100,000 or greater and construction activity disturbing 5 acres or greater and 10 categories of industrial activity.

Phase II took place in 1999 and expanded the NPDES program by requiring MS4s in *urbanized areas* (as defined by the U.S. Census Bureau-definition), public universities, and operators of small construction sites of 1 acre and larger to meet the NPDES permit requirements.

Further information regarding the above can be found in the following EPA fact sheets:

United States. Environmental Protection Agency. *Stormwater Phase II Final Rule* EPA 833-F-00-001. January 2000 (revised December 2005). Fact Sheet 1.0.

United States. Environmental Protection Agency. *Stormwater Phase II Final Rule. Who's Covered? Designation and Waivers of Regulated Small MS4s.* EPA 833-F-00-003 January 2000 (revised June 2012) Fact Sheet 2.1.

United States. Environmental Protection Agency. *Stormwater Phase II Final Rule, Urbanized Areas: Definition and Description.* EPA 833-F-00-003 revised June 2012. Fact Sheet 2.2.

Permit ARR040000 (Authorization to Discharge Under the National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act. Effective date: August 1, 2024. Expiration Date: July 31, 2029).

Fact Sheet and Supplementary Information For General Permit ARR040000 Regulated Small Municipal Separate Storm Water Systems (MS4) In Arkansas. ARR040000.

Overview and Description of the City's Stormwater Drainage Systems:

Little Flock is situated in Benton County, Arkansas and is partially located within the Fayetteville-Springdale-Rogers, AR-MO's 2010 Census's designated Urbanized Area (hereinafter referred to as the Urbanized Area).

The City of Little Flock is responsible for implementing surface water management activities within public City-owned lands within their Urbanized Area. This includes the planning, design, construction, operation, and maintenance of the stormwater drainage system. The City performs all operation and maintenance on the public drainage system designed and constructed to the City's standards and located within easements or rights-of-way, or real property that has been conveyed or dedicated to the City within their Urbanized Area. It also maintains open channels and public outfalls to natural streams within their Urbanized Area.

Watersheds / Stormwater Drainage Basins:

A watershed can be described as a geographic area that captures rainfall and other precipitation from many small systems converging on a larger drainage way. Little Flock is contained in two 8-Digit-HUC watersheds - the Elk Watershed for the northern majority of their Urbanized Area, and a very small amount of the Illinois Watershed for the southern portion of their Urbanized Area. The receiving stream is Little Sugar Creek which eventually becomes the Elk River. The Elk River flows into the Neosho River.

These two main watersheds further break down in the following 10 and 12-Digit HUC watersheds:

Elk Watershed (HUC 8)

- Little Sugar Creek Watershed (10-Digit HUC)
- Brush Creek-Little Sugar Creek Watershed (12-Digit HUC)

Illinois Watershed (HUC 8)

- Osage Creek-Illinois River Watershed (10-Digit HUC)
- Headwaters Osage Creek-Illinois River Watershed (12-Digit HUC)

Purposes and Scope:

Purposes:

There are three purposes of the Stormwater Plan (SWMP), as follows:

- 1- The Stormwater Program is for cataloging a City's stormwater drainage system (both the open and piped systems), its connections to streams, and the overall condition of the system. This cataloging is necessary to address relevant State and Federal regulatory requirements, it provides baseline information on which to develop focused stormwater management strategies, it provides a map and

system for tracking pollutants back to their source, and it provides a scheduled observance program for observing any maintenance needs of the stormwater system.

2- The Stormwater Program is used to establish goals, policies, and implementation actions that will achieve the City's long-term objectives in a way that is understandable to the public, usable by City staff, and that meets regulatory needs.

3 - The Stormwater Program establishes a means for measuring, reporting, and adaptively managing the City's water resources by presenting benchmarks that will ensure meaningful progress, as well as ensuring compliance with applicable laws and permit requirements.

Scope:

The scope of the Stormwater Program is determined primarily by the Federal MS4 permit requirements and is intended to address local water resource issues. The rules and regulations specified in this SWMP are designed to reduce pollutant discharges, to protect water quality, and to satisfy the appropriate water quality requirements and the Clean Water Act. The stormwater program ensures that stormwater quality management policies and management practices will be implemented by the City.

Areas of Focus in the Stormwater Program:

Public education geared toward broad community stewardship of water resources. The Federal NPDES Stormwater Program places significant emphasis on public education as part of the long-term solution to stormwater pollution. As such, education is a required element of the Stormwater Program. The long-term success of the City's efforts will hinge on increased awareness and stewardship throughout the community. Many of these efforts are most effectively approached on a broad Northwest Arkansas MS4 basis through cooperative efforts with the University of Arkansas Cooperative Extension Service.

Public awareness and involvement in Little Flock's Stormwater management program. Broad awareness and participation in the development and implementation of the Stormwater Program by residents and local area businesses is a key component to ensure effectiveness of the Stormwater Program. The Stormwater Program includes a public involvement component in its development that meets the Federal NPDES program's requirements.

Detection and elimination of pollution incidents and unlawful (illicit) discharges to the City's stormwater drainage system. These discharges can be systematic (recurring) or episodic (occasional or one-time) discharges, and include pollutant runoff from parking lots, discharges from industrial outfalls, accidental spills, poor construction site management, and a variety of ways people dump pollutants into street gutters or catch basins.

On-site management of stormwater to reduce the quantity of stormwater and pollution entering the drainage system. Similar to illicit discharges, events that cause flooding, system surcharges, or ongoing pollutant loading can occur downstream from the City's Urbanized Area and originate from a variety of causes. These include inadequacies in the type and design of infrastructure, inadequate

maintenance, insufficient erosion and/or sediment control practices. The City regulates these issues through implementation of their ordinances.

Reduction and prevention of pollution from City facilities and from City activities and business practices. The City provides services with a potential of creating water pollution, erosion, and sedimentation. These include field activities such as ditch cleaning and excavation/maintenance activities, activities at city facilities such as vehicle washing and maintenance, painting, and material handling (such as street sweeper dumping and processing), and continued construction activities. The Federal NPDES Stormwater Program requires the City to implement pollution prevention practices within their Urbanized Area that reduce or eliminate stormwater pollution from their activities. Beyond this regulatory motivation, it is important that the City lead by example in areas where similar practices and behaviors from citizens and businesses are required.

Maintain knowledge of the City's stormwater plan. The City maintains a map of their stormwater system. This plan will be updated periodically to maintain a masterplan for tracking pollutants. Dry Weather Screenings will be conducted based off this map in order to maintain knowledge of the general health of their Stormwater System.

Goals, Policies, & Implementation Actions:

In order to aid development of its MS4 program, Little Flock created a list of needed policies to explain how those policies would be implemented. The following section provides overall guidance in performing stormwater management activities in a manner consistent with State and Federal laws, while meeting local goals and the long-term outcomes the City hopes to achieve.

The following goals are derived from long-term key outcomes that have been reviewed. The following policies provide specific direction consistent with the stated goals and State and Federal requirements. Implementation actions include BMPs discussed in detail in the MS4 program and actions needed to achieve local objectives.

GOAL 1: Protect citizens and property from flooding.

Policies:

- A. Maintain surface drainage within the City's Urbanized Area to reduce the threat of flooding, through proper maintenance of their stormwater drainage system infrastructure, and with practices that are protective of water quality.
- B. Through the development review process, ensure that new development incorporates adequate stormwater management infrastructure to avoid downstream capacity and water quality problems.
- C. Adhere to standards, policies, and practices which comply with Federal Emergency Management Agency (FEMA) Flood Management Program requirements.

Implementation Actions:

1. Continue evaluation of their maintenance practices and implement appropriate BMPs to ensure that the City adequately maintains the stormwater drainage system capacity in an environmentally responsible manner.

2. Evaluate and refine their drainage program, including outreach, inspection, and enforcement components to reduce the negative stormwater impacts from land alteration, erosion, sedimentation, and excessive runoff.
3. Continue adding to the City's MS4 map in order to assess the City's stormwater drainage system and capacity needs and to identify capital improvements and other measures necessary to maintain adequate system capacity for planned community growth.
4. Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to minimize or eliminate erosion and sedimentation in the stormwater drainage system.

GOAL 2: Improve surface and sub-surface waters for aquatic life and other beneficial uses.

Policies

- A. Through the development review process, the City will ensure that development is protective of significant open waterways, wetlands, and riparian areas.
- B. The City will implement permitting programs, educational outreach, compliance inspections and enforcement activities as needed to reduce erosion, sedimentation, illicit discharges, and other pollution impacts to the City's waterways. Education is handled by the University of Arkansas' Cooperative Extension Service.

Implementation Actions

1. The City will review and refine as needed its drainage program, which addresses erosion, sedimentation, and the impacts of land alteration, including permitting, inspections, technical education and outreach.
2. The City will review development proposals for impacts on open drainage ways and will protect the functions and benefits of these areas as provided for in the City's Ordinances.
3. The City will work cooperatively with citizens, businesses, and agencies to protect and improve surface waterways, seek opportunities for stewardship partnerships, further enhance educational opportunities, and continue participation in intergovernmental work groups.
4. The City will implement and continue to refine/improve BMPs for all Campus activities with potential to impact water quality and/or the functions of waterways, wetlands, and riparian areas.
5. Implement BMPs consistent with NPDES Minimum Control Measure #4, Construction Site Stormwater Runoff Control, to reduce or eliminate sedimentation from construction sites as a contributor to poor water quality and quantity management.
6. Implement BMPs consistent with NPDES Minimum Control Measure #5, Post-Construction Stormwater Management for New Development and Redevelopment, so new development at a minimum maintains the functioning of the stormwater drainage system and doesn't contribute to future degradation.
7. Implement BMPs consistent with NPDES Minimum Control Measure #6, Pollution Prevention in Municipal Operations, which is critical to maintaining properly functioning wetland and riparian areas and open channels.

GOAL 3: Preserve and maintain surface waters, wetlands, and riparian areas.

Policies

- A. The City will develop targeted education, outreach, and technical assistance programs regarding practices and obligations for keeping debris and pollutants out of the stormwater drainage system. The City will also train stakeholder groups in appropriate erosion control and sediment prevention practices, as well as stormwater management BMPs.
- B. The City will develop, implement, and enforce appropriate building, design, and ordinances to address water quality compliance issues, including pollution, habitat, and aesthetic issues, to encourage the development of urban waterways that are positive amenities in the community.

Implementation Actions

- 1. The City will continue to support outreach and education efforts regarding water quality, and riparian and wetland areas, including business, contractor, and developer outreach programs to educate these parties about their impacts on stormwater quality.
- 2. Continue to maintain enforcement and compliance activities, including inspections, technical assistance, and Ordinance enforcement.
- 3. Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to engage the public in the efforts to create positive urban amenities.
- 4. Implement BMPs consistent with NPDES Minimum Control Measure #3, Illicit Discharges Detection and Elimination, to ensure that waterways are safe, meet State water quality standards, and can function as positive amenities.

GOAL 4: Citizens, businesses, and industries understand the need to protect water quality.

Policies

- A. The City will work with the University of Arkansas Cooperative Extension Service to develop targeted education, outreach, and technical assistance programs regarding practices and obligations for keeping debris and pollutants out of the storm water drainage system.
- B. The City will develop, implement, and enforce appropriate building, design, and City Ordinances to address water quality compliance issue such as pollution.

Implementation Actions

- 1. The City will continue to support outreach and education efforts regarding water quality, riparian and wetland areas, including business, contractor, and developer outreach programs to educate these parties about their impacts on stormwater quality.
- 2. Continue to maintain enforcement and compliance activities including inspections, technical assistance, and Ordinance enforcement.
- 3. Implement BMPs consistent with NPDES Minimum Control Measure #1, Public Education and Outreach on Stormwater Impacts, to engage the public in the efforts to create positive urban amenities.
- 4. Implement BMPs consistent with NPDES Minimum Control Measure #3, Illicit Discharges Detection and Elimination, to ensure that waterways are safe, meet State water quality standards, and can function as positive amenities.

GOAL 5: Urban drainage ways become community amenities.

Policies

- A. The University of Arkansas Cooperative Extension Service will conduct education and outreach activities to appropriate target groups to increase understanding of the importance of maintaining safe and clean drainage ways, and to seek volunteers willing to be caretakers for water features near them.
- B. Little Flock will, through their ordinances, protect existing significant open waterways and encourage site planning that enhances the natural functions of the water features.
- C. The City will maintain urban drainage ways in a manner that provides for safe conditions within the limits of its fiscal constraints.

Implementation Actions

1. Enhance the City's erosion control program, including educating contractors and the community regarding the positive aspects of open waterways to promote acceptance, and integrating effective compliance and enforcement components.
2. Provide adequate funding within the City's restraints for maintenance of the stormwater drainage system, and ensure ongoing maintenance of private stormwater features through development agreements.
3. The University of Arkansas Cooperative Extension Service will work to increase educational outreach to the public to increase awareness of the public regarding the need to keep litter and pollutants out of urban drainage ways.
4. Implement all six of the NPDES Minimum Control Measure BMPs. Implementing all of the provisions of the MS4 program will ultimately result in improved water quality and quantity management, improved habitat and resource protection, and, ultimately, enhance urban waterways as desirable community amenities.

The City's NPDES MS4 Program:

Little Flock's Stormwater Management Program - Responsible Parties:

The City is responsible for implementing surface water management activities within its Urbanized Area, including the planning, design, construction, operation, and maintenance of the stormwater drainage system where located on public land in their Urbanized Area. In response to the NPDES Phase II stormwater requirements, Little Flock developed an MS4 program addressing each of the six required Minimum Control Measures specified in the Federal-NPDES Phase II rules. The City's stormwater management program is the responsibility of the City Administration. However, the implementation of the City's MS4 program will extend throughout the City's organization by the following City departments being involved in stormwater management: Planning Commission, Street Department, and City Contract Engineer. Each department's task is to recognize and address any stormwater issues of their facilities and the field work they do, and to log data as needed for stormwater-related events.

City Maintenance and New Development

The Street Department maintains all City-owned property through maintenance activities such as mowing, tree trimming, storm drainage removal of debris, sediments, and other items that may hinder conveyance of stormwater. For street maintenance, the City rents street sweepers. New development is held to a high standard of following best management practices to prevent stormwater pollution. Within Little Flock's Urbanized Area, any stormwater infrastructure within the Arkansas Department of Transportation's (ARDOT) Right-of-Way (ROW) is the responsibility of ARDOT and not of the City.

ADEQ-required Municipal Separate Storm Sewer System (MS4) Plan Elements:

The Federal rules and, therefore, ADEQ's permit requirements, direct that the City's MS4 program address six minimum areas termed "Minimum Control Measures" described in detail later in this document:

Minimum Control Measures:

1. **Public Education and Outreach on Stormwater Impacts** (*III, 2, A of the NPDES Permit ARR040000*)
2. **Public Involvement/Participation** (*III, 2, B of the NPDES Permit ARR040000*)
3. **Illicit Discharge Detection and Elimination** (*III, 2, C of the NPDES Permit ARR040000*)
4. **Construction Site Stormwater Runoff Control** (*III, 2, D of the NPDES Permit ARR040000*)
5. **Post-Construction Stormwater Management for New Development and Redevelopment** (*III, 2, D of the NPDES Permit ARR040000*)
6. **Pollution Prevention/Good Housekeeping in Municipal Operations** (*III, 2, F of the NPDES Permit ARR040000*)

For each of these six minimum control measures, this SWMP includes the following information:

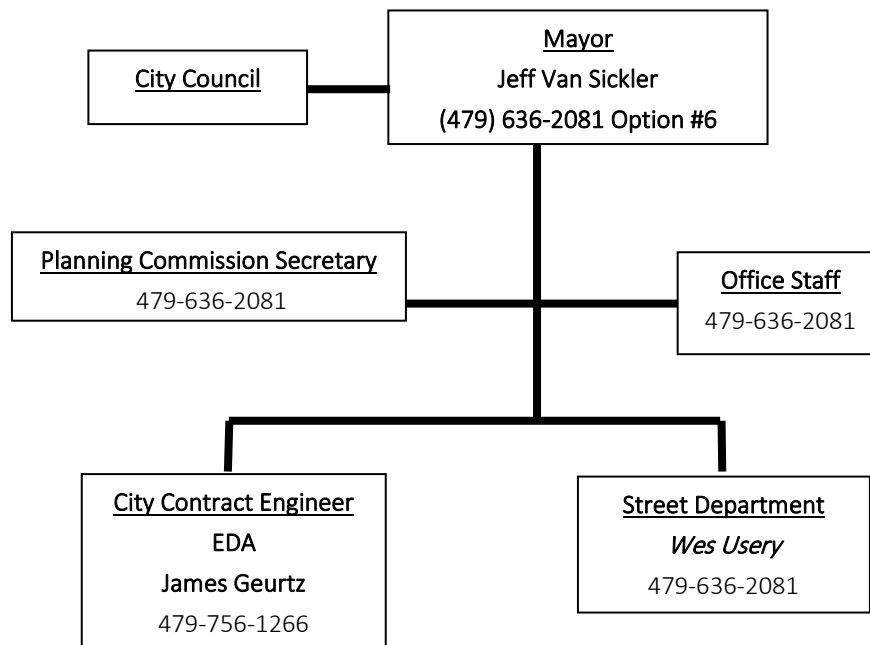
- The Best Management Practices (BMPs) that the permittee or another entity will or already implements for each of the stormwater Minimum Control Measures;
- The measurable goals (Benchmarks) for each of the BMPs including, as the City has authority to implement and as appropriate: the years in which the permittee will undertake required actions and the frequency of the action, in order to satisfy the Permit's performance standards;
- The person or persons responsible for implementing or coordinating the BMPs for the City's MS4 program. There shall be a Table of Organization including a primary point of contact and identification of how implementation of the SWMP across the City's various positions, agencies, and departments will occur. Needed contact information and position title for each entity shall be listed.
- Rationale for how and why each of the BMPs and measurable goals for the permittee's stormwater management program was selected. The MS4 program is required to be developed and implemented within five (5) years of initially being granted Small MS4 general permit coverage. Since Little Flock initially had coverage under a previous version of this permit, they have revised the MS4 program and this SWMP where needed to satisfy the 2024-2029 NPDES Permit ARR040000.
- Reevaluation of BMPs will occur if Little Flock discharges into impaired waters, waters with an approved TMDL where it has been determined that the City contributes to said impairment, or waters designated as an Extraordinary Resource Water (ERW), Ecologically Sensitive Waterbody (ESW), or a Natural and Scenic Waterway (NSW). The enhanced BMPs shall be specifically addressed within the SWMP. *See below:*

Stormwater Best Management Practices (BMPs):

The term "Stormwater Best Management Practices (BMPs)" is a *catch-all* term for approaches to managing stormwater that reduce negative impacts of runoff on the receiving streams. While the term has become widely used by regulatory agencies and throughout the stormwater management industry, it does *not* imply that each BMP is necessarily the "Best" at achieving a particular stormwater management objective. BMPs are alternatives to practices that reduce the water quality and flow management functions and benefits of the open drainage system such as piping, filling or hardening open drainage ways. BMPs include, but are not limited to:

- physical structures or created natural features such as wetlands or ponds that improve water quality and/or attenuate flow;
- maintenance or construction practices that prevent erosion, control sedimentation, and reduce pollution entering runoff;
- educational strategies that inform the public, developers, contractors, business/industry, etc. on stormwater pollution prevention;
- regulations and enforcement programs that protect water quality;
- protection of open drainage ways for stormwater treatment and conveyance and maintaining adjacent (riparian) buffers to provide natural stormwater filtration, cooling and long-term channel stability and other stormwater management functions; and the avoidance of piping, filling, or deteriorating the condition of open drainage ways.

Organizational Chart



Also part of this organization chart is the University of Arkansas' Cooperative Extension Service which provides the educational aspect of the MS4 program.

NPDES Phase II BMP Requirements:

Specific BMPs, proposed for each Minimum Control Measure, are intended to support the reduction of pollutant discharges in stormwater runoff to the *maximum extent practicable (MEP)* as required by the Federal-NPDES Phase II rules. The tables to follow provide a summary of the selected BMPs and the

associated implementation schedule. A summary sheet is provided for each Minimum Control Measure, which includes a list of the selected BMPs, the rationale for their development and selection, and a summary of the measurable goals and implementation schedule.

On the following pages, the five-year BMP development/implementation schedule specifies when certain activities will be completed on a fiscal year basis. The NPDES Phase II rules provide for a five-year implementation schedule starting August 01, 2024 and terminating July 31, 2029.

Minimum Control Measure #1: Public Education and Outreach on Stormwater Impacts

Decision Process

The MS4 Stormwater Compliance Group meets to discuss stormwater pollution prevention and provide input on education activities. The NWA Stormwater Education Steering committee convenes at least once each year to review and evaluate program accomplishments and plan next steps. Both groups provide the localized input used to identify critical stormwater pollutants, education needs, target audiences, program methods, and public relations strategies.

Public Education/Outreach BMPs

Develop and distribute educational materials

Input from both the MS4 Stormwater Compliance Group and NWA Stormwater Education Steering Committee guides the emphases of electronic and printed educational materials. Once topics are identified, materials will be developed, adapted, and/or gathered for distribution at public meetings, in support of presentations, and with educational displays. Examples may include fact sheets, videos, social media content, website content, newsletters, press releases, and PSAs.

Conduct stormwater education activities

Educational presentations will be given to illustrate stormwater dynamics, identify potential pollutants and pathways, describe techniques to reduce stormwater pollution and encourage voluntary BMP implementation according to the annual topic/audience emphases outlined in the table below.

Measurable Goal:

Stormwater education programs will be conducted and documented.

Mechanism types and numbers of educational materials will be documented.

Develop 5 educational materials across the permit term.

Attendance of MS4 Stormwater Compliance Group and Education Steering Committee meetings will be documented.

Responsible Party

The Northwest Arkansas Regional Planning Commission and the University of Arkansas Cooperative Extension Service have contracted with the MS4 to be responsible for the development and implementation of the public education efforts. A copy of that agreement is included in this plan.

Performance Standard:

Urban stormwater outreach/education programs will reach at least 50% of the urbanized area population.

**Minimum Control Measure #1:
Public Education & Outreach on Stormwater Impacts
5 Year Implementation Schedule of Measurable Goals**

2025	2026	2027	2028	2029
<i>Topic Emphases:</i> Storm drain awareness/dumping	<i>Topic Emphasis:</i> Slow runoff from impervious surfaces	<i>Topic Emphasis:</i> Sediment control	<i>Topic Emphasis:</i> Litter	<i>Topic Emphasis:</i> Yard waste
<i>Target Audience:</i> General public	<i>Target Audience:</i> Residential, municipal, and small commercial	<i>Target Audience:</i> Land development community	<i>Target Audience:</i> General public	<i>Target Audience:</i> General public and green industry
<i>Rationale:</i> Pollutants entering the storm drain system degrade water quality	<i>Rationale:</i> Negative impacts of stormwater runoff can be mitigated by slowing runoff and allowing it to stay on site through LID and disconnecting impervious surfaces.	<i>Rationale:</i> Sediment leaving construction sites can enter the storm drain system and degrade water quality	<i>Rationale:</i> Litter can enter the storm drain system and degrade water quality	<i>Rationale:</i> Improper yard waste disposal can clog drainage ways and excess fertilizer and pesticide applications can enter the storm drain system and degrade water quality

Minimum Control Measure #2: Public Involvement/Participation

Decision Process

The MS4 Stormwater Compliance Group meets to discuss stormwater pollution prevention and provide input on education activities. The NWA Stormwater Education Steering committee (public membership comprised of diverse backgrounds/interests) convenes at least once each year to review and evaluate program accomplishments and plan next steps. Both groups provide the localized input used to identify critical stormwater pollutants, education needs, target audiences, program methods, and public relations strategies.

Target Audience

The audience for public involvement programs and activities will be the general public and may include businesses, trade associations, environmental groups, homeowners, and civic organizations.

Public Involvement/Participation BMPs

Engage Residents in Public Participation/Involvement Activities

Input from both the MS4 Stormwater Compliance Group and Education Steering Committee guides the emphases of educational materials, educational programs, and public involvement efforts. Residents will participate in public involvement activities. Examples may include stormwater compliance meetings, stormwater steering meetings, clean ups, rain barrel workshops, etc.

Measurable Goal:

Public participation activities will be documented.

Responsible Party

The Northwest Arkansas Regional Planning Commission and the University of Arkansas Cooperative Extension Service have contracted with the MS4 to be responsible for the development and implementation of the public involvement efforts. A copy of that agreement is included in this plan.

Performance Standard

At least 5 public participation and involvement activities will be coordinated over the permit term.

Minimum Control Measure #3: Illicit Discharge Detection and Elimination

SWMP Permit Requirements: According to NPDES Permit No. ARRO40000, regulated MS4 must:

1. *...develop, implement and enforce a program to detect and eliminate illicit discharges...into the small MS4 (III, 2, C, a).*
2. *...develop a storm sewer system map, showing the location of all surface waters of the State that receive discharges from those outfalls...(including catch basins, pipes, ditches and public and private stormwater facilities)...(III, 2, C, b).*
3. *...effectively prohibit, through ordinance or other regulatory mechanism, illicit discharges into the storm sewer system and implement appropriate enforcement procedures and actions; (III, 2, C, c.); and shall ...develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping...(III, 2, C, d).*
4. *...inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste; (III, 2, 3, e).*
5. *...address...non-stormwater discharges or flows (i.e. illicit discharges)...only if the MS4 identifies them as significant contributors of pollutants to the small MS4: uncontaminated water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, uncontaminated foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, uncontaminated footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, uncontaminated street wash water, and discharges or flows from emergency fire fighting activities, and splash pads (III, 2, C, f).*
6. *...may develop a list of other similar occasional incidental non-storm water discharges (e.g. non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-storm water discharges must not be reasonably expected...to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions the MS4 have established for allowing these discharges to the permittee's MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to waters such as impaired waters, waters with an applicable TMDL, ERWs, ESWs, or NSWs, BMPs on the wash water, etc.). The MS4 must document in the SWMP any local controls or conditions placed on the discharges. The MS4 must include a provision prohibiting any individual non-storm water discharge...determined to be contributing substantial amounts of pollutants to the permittee's MS4. (III, 2, C, g).*
7. *...document the decision process for the development of a stormwater illicit discharge detection and elimination program. ...the rational statement shall address the overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for the program...and shall include the following information, at a minimum: (III, 2, C, h).*
 - a. *...how the MS4 will develop a storm sewer system map showing ...location of all outfalls and the names and location of all receiving waters. Describe the sources of information used for the storm sewer system maps and the plan to verify the outfall locations with field surveys. If already completed, describe how the map was developed. Also, describe how the storm sewer system map will be regularly updated. III, 2, C, h, (1).*
 - b. *The mechanism (ordinance or other regulatory mechanism) the MS4 will use to...prohibit illicit discharges...and why the MS4 chose that mechanism. ...Include a copy of the relevant sections with the program. (III, 2, C, h, (2).*
 - c. *The plan (through enforcement procedures and actions) that will ensure that the illicit discharge ordinance is implemented. (III, 2, C, h, (3))*

- d. *The plan to detect and address illicit discharges...shall include dry weather field screening for non-stormwater flows... The created plan shall address the following... (III, 2, C, h (4)):*
 - I. *Procedures for locating priority areas...with higher likelihood of illicit connections (e.g., areas with older sanitary sewer lines) or ambient sampling to locate impacted reaches. (III, 2, C, h (4) i).*
 - II. *Procedures for tracing the source of an illicit discharge, including the specific techniques that will be used to detect the location of the source. (III, 2, C, h, (4) ii).*
 - III. *Procedures for moving the source of the illicit discharge; and (III, 2, C, h, (4) iii).*
 - IV. *Procedures for program evaluation and assessment. (III, 2, C, h, (4) iv).*
- e. *...how the MS4 plans to inform public employees, businesses, and the general public of hazards associated with illegal discharge and the improper disposal of waste. Include in the description how this plan will coordinate with the public education minimum measure and the pollution prevention/good housekeeping minimum measure programs; (III, 2, C, h, (5)).*
- f. *...who is responsible for overall management and implementation of the stormwater illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program; and (III, 2, C, h, (6))*
- g. *...How the MS4 will evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs. (III, 2, C, h, (7))*

Little Flock has chosen to follow the below five Illicit Discharge, Detection, and Elimination (IDDE) BMPs to address the above SWMP permit requirements:

- IDDE1 – Illicit Discharge Reporting and Tracking Regulating Documents
- IDDE2 -- Storm Sewer Inventory and Mapping
- IDDE3 – Illicit Discharges Response and Enforcement
- IDDE4 – City-wide Illicit Discharge Detection and Elimination
- IDDE5 -- Non-Stormwater Discharge Assessment

Decision Process

Little Flock selected the above BMPs to aid in developing tools and processes for discovering and eliminating illicit stormwater discharges. The City's [Stormwater Pollution Prevention and Erosion Control Standards](#) and [Stormwater Pollution Prevent, Grading, and Erosion Control BMP Manual](#) give Little Flock a framework from which City staff tracks and regulates illicit discharges (**IDDE1**). **IDDE1** sets standard regulations expected to be followed. This addresses above permit requirements **1 & 3**. Little Flock uses its detailed map of the City's ditches, outfalls, detention ponds, springs, culverts, storm pipes, roads, and waterbodies for inspections. They also maintain and update the map when changes are needed (addressed in **IDDE2, IDDE4, & 2**).

The stormwater conveyance map was created from online aerial imagery, .dwg files from past development plans, from old plan sets, and from field observations (**2**). Names of waterbodies come from google earth's Water .kmz file data and, if needed, historical surveys or local knowledge. Outfalls will be inspected at least once every five years. The inspector reports any discovered inaccuracies or needed map updated to the mapper for corrections (**2 & 7a**). The City's existing code will be utilized to enforce elimination of prohibited illicit discharges (**7b**). The Stormwater Pollution Prevention and Erosion Control Standards ordinance and the Stormwater Pollution Prevention, Grading, and Erosion Control Best Management Practices Manual give the City the ability to regulate and enforce illicit discharge regulations (**7b & 7c**). Areas that have experienced past illicit discharges which retain an elevated risk of repeated events, areas with known activities that can cause illicit discharges, and areas known to be of higher risk

in causing illicit discharges, will be marked on the MS4 map as a “Priority Area” and information about potential illicit discharges from these areas will be included in the City’s O&M Manual (7d, I).

Permit requirements 4, & 7e are addressed through the University of Arkansas’ Cooperative Extension Service’s public education portion of this SWMP permit. IDDE3 (utilizing/addressing permit requirements 1, 3, & 5) involves utilizing the City’s Ordinances for a response and enforcement framework guide to illicit discharges, including any non-stormwater discharges or flows determined to be significant contributors of pollutants (5). IDDE3 & 4 involve City Staff utilizing their MS4 map and the illicit discharge reporting system to detect and eliminate sources of illicit discharge. City staff responds to illicit discharge reports/discoveries and they address measures required for elimination of illicit discharges (7e II). When allowable non-stormwater illicit discharges are discovered, Staff will keep a record and a list of the allowable discharges (IDDE5 & 6). Dry-weather screening for non-stormwater flows will occur in order to detect and address illicit discharge to the MS4 system (IDDE4). Tracking of illicit discharges shall utilize public and employee complaints and the stormwater map; from the known source of the contamination, the inspector shall track the illicit discharge up-flow to locate the source. (7d I & II). Once the source of the illicit discharge has been discovered, the City’s code regulations will be utilized, to require remediation of the situation (7d III). The success of this Minimum Measure will be determined by whether illicit discharges are remediated as required by the City and by the NPDES permit no. ARRO40000 (7g). The Street Department staff is responsible for overall management and implementation of the stormwater illicit discharge detection and elimination inspections. Other City offices may become involved in cleanup of illicit discharges (7f).

Each of the Measurable goals was selected in order to coincide with the rows of the Annual Report and with the NPDES Permit No. ARRO40000’s regulations for each minimum control measure (7e III). If Little Flock encounters problems locating illicit discharges and/or enforcing illicit discharge elimination, they will reevaluate the program elements (7d iv).

Measurable Goals

IDDE1 - Illicit Discharge Reporting and Tracking Regulating Documents

Measurable Goals:

- Continue following policy documents:
 - [Stormwater Pollution Prevention and Erosion Control Standards](#)
 - [Stormwater Pollution Prevent, Grading, and Erosion Control BMP Manual](#)
- Continue utilizing the standard forms and procedures for MS4 complaints, reports, and discoveries of illicit discharges.

IDDE2 - Storm Sewer Inventory and Mapping

Measurable Goals:

- Continue adding any new outfalls, stormwater pipes, ponds, ditches, and springs to the map when discovered.
- Add new .dwg linework to the Stormwater Map when new development or changes in ditches, outfalls, or storm pipes occur.

IDDE3 – Illicit Discharges Response and Enforcement

Measurable Goals:

- Staff to continue reporting to the Street Department any concerns observed while completing daily responsibilities
- Complaints phoned in shall continue to be directed to the Street Department, all complaints documented, and a file created for investigation and resolution.
 - Track number of complaints received and investigated
- Continue to track number of enforcement actions taken

IDDE4 – City-wide Illicit Discharge Detection and Elimination

Measurable Goals:

Detection

- Continue to inspect outfalls and record inspection data, resulting in 100% of the outfalls being inspected by the termination of this SWMP's permitted span.
- Add Priority Areas to map & add information about these areas to the O&M Manual.
- Continue to update storm sewer outfall map as needed.
- Staff to continue to report any concerns observed while completing their daily responsibilities.

Elimination

- Continue to follow enforcement procedures developed for illicit discharges.
- Continue to educate City Staff and area businesses about illicit discharges (*carried out by the University of Arkansas' Cooperative Extension Service's public education programs*).
- Continue to track number of outfalls dry-weather screened.
- Continue to track number of dry-weather flows identified.
- Continue notifying responsible parties of illicit discharges and work with them to create plans of resolution.
- Report severe incidents to the appropriate State or Federal agency.

IDDE5 - Non-Stormwater Discharge Assessment

Measurable Goals:

Assess non-stormwater discharges; once identified:

- Continue to record allowable and potentially significant non-stormwater illicit discharges.
- Continue to review if discovered discharges are detrimental to storm water system; if they are, work to eliminate them.

Responsible Parties

- Street Department
- City Contract Engineer

Performance Standard

The successful implementation of a non-stormwater discharge assessment process includes complete mapping of the storm sewer system, utilization of standard forms and procedures, and the ability to track progress of events such as screenings, inspections, and enforcement in order to determine where non-stormwater discharges exist.

**Minimum Control Measure #3:
Illicit Discharge Detection & Elimination (IDDE)
5 Year Implementation Schedule of Measurable Goals**

BMP#	PERMIT YEAR				
	2025	2026	2027	2028	2029
IDDE1	Illicit Discharge Reporting and Tracking Regulating Documents				
	Continue utilizing the standard forms and procedures for MS4 complaints, reports, and discoveries of illicit discharges.				
IDDE2	Storm Sewer Inventory and Mapping				
	Continue updating the MS4 outfall map as new development occurs and as new outfalls, stormwater pipes, ponds, ditches, and springs are discovered.				
IDDE3	Illicit Discharge Response and Enforcement				
	<ul style="list-style-type: none"> – Continue reporting to the Street Department any concerns observed while completing daily responsibilities. – Continue to direct MS4 complaints to the Street Department – Continue tracking number of complaints received and investigated – Continue to track number of enforcement actions taken 				
IDDE4	City-Wide Illicit Discharge Detection and Elimination				
	Add Priority Areas to map & add information about these areas to the O&M Manual.		Add new Priority Areas to the map if new ones are found.		
	<ul style="list-style-type: none"> – Continue inspecting outfalls and record inspection data, resulting in 100% of the outfalls being inspected by the termination of this SWMP’s permitted span. – Continue updating storm sewer outfall map as needed. – Continue reporting IDDE concerns observed while completing their daily responsibilities. – Continue following enforcement procedures developed for illicit discharges. – Continue educating City Staff and area businesses about illicit discharges (<i>carried out by the University of Arkansas’ Cooperative Extension Service’s public education programs</i>). – Continue tracking number of outfalls <u>dry-weather screened</u>. – Continue tracking number of <u>dry-weather flows identified</u>. – Continue notifying responsible parties of illicit discharges and working with them to create plans of resolution. – Report severe incidents to the appropriate State or Federal agency. <p style="text-align: center;">(See following page for IDDE4)</p>				

IDDE5	Non-Stormwater Discharge Assessment
	<p>If new allowable and potentially significant non-stormwater illicit discharges are discovered, add them to the list of allowed non-stormwater illicit discharged in the O&M Manual.</p> <p>Continue to review if discovered discharges are detrimental to storm water system; if they are, work to eliminate them</p>

Minimum Control Measure #4: Construction Site Stormwater Runoff Control

Permit Requirements: According to NPDES Permit No. ARR040000, regulated MS4 must:

1. *...develop, implement, and enforce a program to reduce pollutants in any stormwater runoff to the permittee's small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre shall 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. If the Division waives requirements for stormwater discharges associated with small construction from a specific site(s), the permittee is not required to enforce the program to reduce pollutant discharges from such site(s). The program shall include the development and implementation of, at a minimum (III, 2, D, a):*
 - a. *Enforce the University's existing regulating documents to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law; III, 2, D, a, (1).*
 - b. *Requirements for construction site operators to implement appropriate erosion and sediment control BMPs; III, 2, D, a, (2).*
 - c. *Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality; III, 2, D, a (3).*
 - d. *Procedures for site plan review which incorporate consideration of potential water quality impacts; III, 2, D, a (4).*
 - e. *Procedures for receipt and consideration of information submitted by the public; and III, 2, D, a, (5).*
 - f. *Procedures for site inspection and enforcement of control measures. III, 2, D, a, (6).*
2. *Decision Process. ...document the decision process for the development of a construction site stormwater control program. The rationale statement shall address both the overall construction site stormwater control program and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum III, 2, D, b, (1):*
 - a. *...(ordinance or other regulatory mechanism)...used to require erosion and sediment controls at construction sites and why the MS4 chose that mechanism...If the ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with the SWMP description. III, 2, D, b, (1)*
 - b. *...plan to ensure compliance with the erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms that will be used to ensure compliance. Describe the procedures for when certain sanctions will be used... III, 2, D, B (2)*
 - c. *The requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. III, 2, D, b, (3)*
 - d. *...procedures for site plan review, including the review of pre-construction site plans, which incorporate consideration of potential water quality impacts. Describe the procedures and...rationale for how certain sites will be identified for site plan review, if not all plans are reviewed. Describe the estimated number and percentage of sites that will have pre-construction site plans reviewed; III, 2, D, b, (4)*
 - e. *...procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with the public education program; III, 2, D, b, (5).*

- f. ...procedures for site inspection and enforcement of control measures, including how sites are prioritized for inspection; III, 2, D, b, (6)
 - g. ...who is responsible for overall management and implementation of the construction site stormwater control program and, if different, who is responsible for each of the BMPs identified with this program, and III, 2, D, b, (7)
 - h. Describe how the MS4 will evaluate the success of this minimum measure, including how the measurable goals were selected for each of the BMPs. III, 2, D, b, (8)
3. Performance Standards. The construction site stormwater control program shall include pre-construction site plan reviews (reviews of construction site Stormwater Pollution Prevention Plans) of 100 percent of projects from construction activities that result in a land disturbance of greater than or equal to one acre. These applicable sites shall be inspected at least on a monthly basis to ensure compliance. III, 2, D, c.

The City has chosen to follow the below three Construction Storm Water (CSW) BMPs to address the above SWMP permit requirements:

Construction Storm Water measures (CSW):

- CSW1** – Stormwater Drainage Ordinance Regulations
- CSW2** – Reduction of runoff pollutants
- CSW3** – Address complaints
- CSW4** – Site Plan Review
- CSW5** – Site Inspections
- CSW6** -- Enforcement

Decision Process

The above chosen six BMPs act to address the construction site stormwater runoff control requirements. Little Flock has existing regulating documents in place to address construction site runoff (**CSW1 and 1, 1b, & 1c**). The City's [Stormwater Pollution Prevention and Erosion Control Standards](#) and [Stormwater Pollution Prevent, Grading, and Erosion Control BMP Manual](#) are made available by the City to guide contractors and to provide regulations for the City to follow for regulating discharges by contractors (**CSW2**). Responsible persons for meeting the requirements of the program are contractors, City Staff (when City Staff is conducting dirt work activities), and City Staff and the City Contract Engineer when enforcement actions are being enforced (**2g**). The Street Department, Planning Department, and City Contract Engineer are responsible for site plan review and site inspections (**2g**). The City' existing regulations provide guides for Staff to utilize in enforcing BMPs applicable on construction sites; this addresses all above **CSW** measures & **1a-1f, 2a, 2c**. Complaints are received by the Planning Commission Secretary and by the Street Department; remediation will be enforced by City staff (**CSW3 & CSW6, 1f**).

Site plans are reviewed by the City Contract Engineer (**CSW4**) for compliance with the City's regulating Ordinances (**2b, 2d-2f, & 3**). Sites of 1 acre or more are required to undergo site plan review (**CSW4, 2d, & 3**). Any plans not in compliance are required to be brought into compliance before the plans will be approved for construction. The City's regulating documents give Little Flock regulations which entities must follow.

Construction site inspections occur at least once a month; if needed, multiple inspections within a month may occur on sites (**CSW5 & 2**). If illicit discharges are discovered on a site, compliance with the City's regulating erosion and sediment control ordinances is required (**2b**). When enforcement actions are

required, a notice will be given to the responsible party detailing the MS4 issue. If this is insufficient, a stop work order may be enforced until the out of compliance issue(s) is/are remediated **(1f, 2b, 2f)**.

Success of this BMP will be determined by tracking the number of sites following the BMP requirements on their site plans, the number following BMP regulations, the number of enforcement actions required, and/or by the rate of compliance **(CSW4, CSW5, CSW6 & 2h)**.

An important aspect of this minimum control measure is public education which is handled by the University of Arkansas Cooperative Extension Service **(2e)**.

Measurable Goals

CSW1 Stormwater Drainage Ordinance Regulations

Measurable Goals:

- Follow the requirements put forth by the existing regulating Ordinances for erosion and construction site runoff control.
- Update the regulating documents if found to be needed.

CSW2 Reduction of Runoff Pollutants

Measurable Goals:

- Staff continue to review all applicable projects of 1 acre and larger, including projects less than 1 acre that are part of a larger common plan of development, before construction, for BMP compliance.
- Erosion and sediment controls are to be shown on the erosion control plans as well as measures to control waste. Such waste includes discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste.

CSW3 Address Complaints

Measurable Goals:

- Utilize the complaint form.
- Record number of complaints received
- Work to get resolution of complaints

CSW 4 Site Plan Review

Measurable Goals:

- Continue to review all applicable projects of 1 acre and larger before construction, for BMP compliance. Staff to review smaller sites if determined by Staff as needed.
- Erosion and sediment controls shall be shown on the erosion control plans as well as measures to control waste. Such waste includes discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste.
- Continue to track number of applicable sites in the MS4 jurisdiction requiring pre-construction plan review.

CSW5 Site Inspections

Measurable Goals:

- A Preconstruction Meeting shall be held to discuss maintenance of BMPs during construction. Track projects requiring Preconstruction Meetings.

- Continue to inspect all applicable sites for compliance with regulating documents once a month or more often if needed.
- Continue to record site inspections.
- Continue to record the number of violation communications issued.

CSW6 Enforcement

Measurable Goals:

- Continue enforcement communications and subsequent inspection letters; tract both. Any reports of non-compliance of BMPs on any construction site are to be dealt with in a timely manner.
- Continue tracking enforcement communications and subsequent inspection letters.
- If problems getting BMP enforcement are encountered, consider updating the regulating policy documents to provide further enforcement actions.

Responsible Parties

Responsible positions for site plan review and site inspections are the Planning Department, Street Department, and the City Contract Engineer. Contractors working on private sites are responsible for following best management practices and City Ordinances to prevent contaminated construction site runoff.

Performance Standard

The performance of this BMP can be determined by how well the BMP requirements are followed for projects and by the enforcement actions of the Street Department.

**Minimum Control Measure #4:
Construction Site Runoff Control
5 Year Implementation Schedule of Measurable Goals**

BMP#	PERMIT YEAR				
	2025	2026	2027	2028	2029
CSW1	Stormwater Drainage Ordinance Regulations				
	Continue to follow the requirements put forth by the existing regulating Ordinance documents for erosion and construction site runoff control. Update the regulating documents if found needed.				
CSW2	Reduction of runoff pollutants				
	Staff to continue reviewing all applicable projects of 1 acre and larger, including projects less than 1 acre that are part of a larger common plan of development, before construction, for BMP compliance.				
CSW3	Address complaints				
	Continue to utilize the complaint form. Continue to record number of complaints received, and the process followed to remedy the complaints. Continue to work to get resolution of complaints.				
CSW4	Site Plan Review				
	Staff to review all applicable project plans of 1 acre and larger before construction, for BMP compliance. Staff to review smaller sites if determined by Staff to be needed. Erosion and sediment controls are to be shown on the erosion control plans as well as measures to control waste. Such waste includes discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste. Continue to track number of applicable sites in the MS4 jurisdiction requiring pre-construction plan review.				
CSW5	Site Inspections				
	Continue to conduct Preconstruction Meetings to discuss maintenance of BMPs during construction. Continue to track projects requiring Preconstruction Meetings. Continue to inspect all applicable sites for compliance with regulating documents once a month or more often if needed. Continue recording site inspections and the number of violation communications issued. <p style="text-align: center;">(See following page for CSW6)</p>				

CSW6	Enforcement
	Continue enforcement communications and subsequent inspection letters; track both. Any reports of non-compliance of BMPs on any construction site are to be dealt with in a timely manner.
	Continue tracking enforcement communications and subsequent inspection letters. If problems are encountered getting BMP enforcement, consider updating the regulating policy documents to provide additional enforcement abilities.

Minimum Control Measure #5: Post-Construction Stormwater Management in New Development and Redevelopment

Permit Requirements: According to NPDES Permit No. ARR040000, regulated MS4 must:

1. *...develop, implement, and enforce a program to address 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 or scale, that discharge into a small MS4. The program shall ensure that controls are in place that will prevent or minimize water quality impacts. III, 2, E, a*
2. *...develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for the community. III, 2, E, b*
3. *...use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law...III, 2, E, c*
4. *The permittee shall ensure adequate long-term operation and maintenance of BMPs. III, 2, E, d*
5. *Decision process...document the decision process for the development of a post-construction SWMP. The rational statement shall address both the overall post-construction SWMP and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum: III, 2, E, e*
 - a. *Develop...a program to address stormwater runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program. III, 2, E, e, (1)*
 - b. *How the program will be specifically tailored for a local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions; III, 2, E, e, (2)*
 - c. *Provide information regarding Any non-structural BMPs in the program (i.e. policies...that provide requirements and standards to direct growth to identified areas, protect sensitive areas sch as wetlands and riparian areas, maintain and/or increase open space,...provide buffers along impaired waters, waters with applicable TMDLs, and waterbodies designated as ERWs, ESWs, or NSWs, minimize impervious surfaces, and minimize disturbance of soils and vegetation....policies...that encourage infill development in higher density urban areas, areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventative maintenance and spill prevention. III, 2, E, e, (3)*
 - d. *Provide information regarding...Any structural BMPs in the program (i.e. stormwater storage practices such as wet ponds and extended-detention outlet structures, infiltration practices, etc.). III, 2, E, e, (4)*
 - e. *Provide information regarding the...regulatory mechanisms...used to address post-construction runoff from new developments and redevelopment and why they were chosen. If a mechanism needs to be developed, then describe a plan and a schedule to do so. III, 2, E, e, (5)*
 - f. *How the permittee will ensure the long-term operation and maintenance (O&M) of the selected BMPs. III, 2, E, e, (6)*
 - g. *Who is responsible for overall management and implementation of the post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program; and III, 2, E, e, (7)*
 - h. *How the MS4 will evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs. III, 2, E, e, (8)*
6. *Performance Standards. The post-construction SWMP shall include pre-construction site plan review...of 100 percent of projects...with land disturbance of greater than or equal to one acre...These*

applicable sites shall be inspected....The program shall also ensure that long-term O&M are developed and agreements are in place... III, 2, E, f

7. *Annual Reporting. The MS4 annual report shall document the following: number of applicable sites, number of pre-construction site plans reviewed, number of site inspections,...compliance rates...and the number of long-term O&M plans developed and agreements in place. III, 2, E, f*
8. *Low Impact Development. ADEQ recommends that MS4s evaluate their existing codes and planning procedures to remove impediments to low impact development and green infrastructure. The Department also encourages municipalities to evaluate proposed development using green infrastructure for waivers from local requirements in tehri community planning process. The operator must include information on efforts to identify and remove impediments to LID in the post-construction program element of the Annual Report covering the 4th year of this renewal permit term. III, 2, E, h*

The City has chosen to follow the below six Development Standards (DS) BMPs to address the above SWMP permit requirements:

Development Standards (DS):

- DS1** -- City Code of Ordinances and BMP Manual
- DS2** -- Post Construction Requirements
- DS3** -- Site Plan Review
- DS4** -- Site Inspection Procedures
- DS5** -- Enforcement Procedures
- DS6** -- Long-Term O&M Plans/Agreements

Decision Process

Regulations for post-construction site runoff on sites one acre or larger are already in place (**DS1**). In the City's regulating documents, strategies covering a combination of structural and/or non-structural BMPs requirements are provided (**DS1, DS2, 1-3**). These documents are the City's [Stormwater Pollution Prevention and Erosion Control Standards](#) and [Stormwater Pollution Prevent, Grading, and Erosion Control BMP Manual](#)

Long-term operation and maintenance of BMPs is ensured in Little Flock through the Street Department's maintenance of drainage ways located within their ROW, through the City enforcing their Floodplain Development Permit, and through private easements being maintained by property owners and Property Owner Associations (POAs) (**DS6 & 4**).

Encourage Low Impact Development (LID) methods (**DS2, 3, 5c, 5d**). Ordinance requirements require development to address post-construction runoff from new development and redevelopment and to also prohibit off-site illicit discharges (**5e**). The [Stormwater Pollution Prevent, Grading, and Erosion Control BMP Manual](#) provides examples of these methods.

Post-Construction BMP methods are reviewed for compliance during Site Plan Review and during Site Inspections (**DS1-DS4, 5a**). Any Priority Areas will be added to the O&M Manual and to the City's MS4 Outfall Map (**5a**). The City's existing City's [Stormwater Pollution Prevention and Erosion Control Standards](#) grants the City permission to enforce compliance actions against compliance offenders (**DS5**)

The success of the program will be measured by the ability to enforce post-construction BMP requirements (DS5 & 5h).

Measurable Goals

DS1 City Code of Ordinances and BMP Manual

Measurable Goals:

- Continue utilizing the existing regulating documents to guide the methods used on construction sites for erosion and sediment control on sites 1 acre or larger in size, including projects less than 1 acre that are part of a larger common plan of development.
- If needed, revise regulating documents to provide additional post-construction runoff regulations.
- Continue to allow certain LID design elements.

DS2 Post Construction Requirements

Measurable Goals:

- When needed, enforce structural BMPs for post construction runoff.

DS3 Site Plan Review

Measurable Goals:

- Review site plans for post-construction BMPs to ensure adequate stormwater controls are employed.

DS4 Site Inspection Procedures

Measurable Goals:

- During a site's final inspection, continue to ensure that any constructed post-construction BMPs are adequately installed.

DS5 Site Enforcement Procedures

Measurable Goals:

- Continue enforcing the City's BMP requirements during both site plan review and during site inspections.
- Continue to record every site inspection and record the number of violation letters issued.

DS6 Long-Term O&M Plans/Agreements

Measurable Goals:

- Add any priority areas for post-construction stormwater management to the O&M Manual and MS4 Outfall Map.
- Continue to have the City's Street Department maintain public storm infrastructure within their ROW and continue to enforce maintenance of privately-owned stormwater conveyance systems.

Responsible Parties

The City's Street Department, Planning Commission, Planning Department, and City Contract Engineer review construction plans, coordinate site plan review, grading and drainage review, and conduct final walk-through inspections. Individual contractors falling under the requirements of Measurable Goal #5 are responsible for their individual sites until a Notice of Termination is awarded. At that point, long-term maintenance of private property is the responsibility of the property owner or the POA.

Performance Standard

The performance of this BMP can be determined by how well the City is able to enforce post-construction requirements.

**Minimum Control Measure #5:
Post-Construction Storm Water Management in New Development and Redevelopment
5 Year Implementation Schedule of Measurable Goals**

BMP#	PERMIT YEAR				
	2025	2026	2027	2028	2029
DS1	City Code of Ordinances and BMP Manual				
	Continue utilizing the existing regulating documents to guide the methods used on construction sites for erosion and sediment control on sites 1 acre or larger in size, including projects less than 1 acre that are part of a larger common plan of development.				
	If needed, revise regulating documents to provide additional post-construction runoff regulations. Remove impediments to LID where possible.				
DS2	Post Construction Requirements				
	Continue enforcing structural BMPs for post construction runoff				
DS3	Site Plan Review				
	Continue reviewing site plans for post-construction BMPs to ensure adequate stormwater controls are employed.				
DS4	Site Inspection Procedures				
	During a site’s final inspection, continue to ensure that any post-construction BMPs are installed adequately.				
DS5	Enforcement Procedures				
	Continue to enforce the City’s BMP requirements during both site plan review & during site inspections.				
	Record every site inspection and record the number of violation letters issued.				
DS6	Long-Term O&M Plans/Agreements				
	Add any priority areas for post-construction stormwater management to the O&M Manual and MS4 Outfall Map.		If new priority areas emerge, add them to the O&M Manual and MS4 Outfall Map.		
	Continue to have the City’s Street Department maintain public storm infrastructure within their ROW and continue to enforce maintenance of privately-owned stormwater conveyance systems.				

Minimum Control Measure #6: Pollution Prevention/Good Housekeeping for Municipal Operations

Permit Requirements: According to NPDES Permit No. ARR040000, regulated MS4 must:

1. *...develop and implement an O&M (operations and maintenance) program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations. III, 2, F, a*
2. *Using training materials that are available from EPA, ADEQ, other organizations, or developed in-house, the program shall include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance; and ...shall include a list of industrial facilities owned or operated by the MS4 that are subject to ADEQ's Industrial Stormwater General Permit or individual NPDES permits for discharges of stormwater associated with industrial activity that ultimately discharge to the MS4. III, 2, F, b*
3. *Decision Process. ...shall document the decision process for the development of a pollution prevention/good housekeeping program for municipal operations. The rationale statement shall address both the overall pollution prevention/good housekeeping program and the individual BMPs, measurable goals, and responsible persons for the program. The rationale statement shall include the following information, at a minimum: III, 2, F, c*
 - a. *The O&M program to prevent or reduce pollutant runoff from the municipal operations. The program shall specifically list the municipal operations that are impacted by this operation and maintenance program; III, 2, F, c, (1)*
 - b. *Any government employee training program that will be used to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance. Describe any existing, available materials planned for use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure; III, 2, F, c, (2)*
 - c. *The program description shall specifically address the following areas: III, 2, F, c, (3)*
 - I. *Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to the MS4; III, 2, F, c, (3), i*
 - II. *Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas the permittee operates; III, 2, F, c, (3), ii*
 - III. *Procedures for the proper disposal of waste removed from the MS4 and the municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris; and III, 2, F, c, (3), iv*
 - IV. *Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices. III, 2, F, c, (3), iv*
4. *Who is responsible for overall management and implementation of the pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program; and III, 2, F, c, (4)*
5. *How will the MS4 evaluate the success of this minimum measure, including how the MS4 selected the measurable goals for each of the BMPs. III, 2, F, c, (5)*
6. ***Performance Standards.*** *The pollution prevention/good housekeeping program shall include, at a minimum, an annual employee training for all eligible employees. An eligible employee is a new or*

veteran employee whose day-to-day work activities have the potential to impact stormwater quality. MS4s shall evaluate all current municipal-owned facilities to ensure that industrial general stormwater permit coverage (ARRO00000), if needed, is obtained. This evaluation shall be included in the first annual report. For all municipal facilities not requiring industrial stormwater permit coverage, the inspections must be performed at least annually for municipal facilities performing maintenance activities on mechanical equipment, facilities with fueling stations, facilities involved in waste storage, transfer or recycling, facilities with material stockpiles, and facilities storing fertilizers or pesticides. The O&M program shall include appropriate procedures, controls, maintenance schedules and recordkeeping to address Part III.2.F.c.(3) of this permit. III, 2, F, c, d

7. Annual Reporting. *The annual report shall document the following:*
 - a. *A summary of employee training program(s) implemented with the number of employees that attended; and*
 - b. *A summary of activities and procedures implemented for the operation and maintenance program. III, 2, F, e*

Little Flock has chosen to follow the below five Pollution Prevention/Good Housekeeping for Municipal Operations standards to address the above SWMP permit requirements:

Operation and Maintenance (OM):

OM1 -- Operation and Maintenance Program

OM2 – Municipal Facility Inspections

OM3 – Maintenance Program

OM4 – Road Salt, Pesticide, Herbicide, and Fertilizer Usage

OM5 – Street Sweeping

Decision Process

The City has a contract with Northwest Arkansas Regional Planning and the University of Arkansas Cooperative Extension Service to offer training at least once a year on reducing contamination to the MS4; applicable City employees attend these training services (**1, 2, 3b, 6**). In addition, periodic meetings are held by the Cooperative Extension Service to discuss MS4 related matters with the City and other MS4s in the area (**3b**). This service provides the needed training per permit requirements **1, 2, 3**, and per **OM1**.

There are no industrial stormwater-permitted facilities owned or operated by the City of Little Flock (**2**). For its City-owned municipal properties, Little Flock will perform annual inspections once a year for MS4 compliance. and a facility inspection form completed (**OM2, 3a, & 4**). The overall pollution prevention/good housekeeping program is composed of individual BMPs, measurable goals, and responsible persons at the City's various facilities (**OM1 & 4**).

The City has an Operations & Management Manual which will continue to be utilized to address routine maintenance activities and practices involving road salt, pesticides, herbicides, and fertilizer usages (**OM4**). This manual also addresses controls for reducing or eliminating discharges of pollutants from streets, roads, highways, parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas (**OM3, OM4, OM5, & 3c I-II**). Procedures guiding proper disposal of waste are included in this manual and will be followed (**3c III**). Said procedures aim to prevent or reduce pollutants contained in urban stormwater runoff from municipal operations.

New projects are required to follow existing Ordinance requirements for reducing impacts on water quality (3d). Success of this BMP will be determined by methods successfully implemented to reduce applied pollutants such as road salt (3c, II).

OM1 Operation and maintenance program

Measurable Goals:

- As part of the contract with Northwest Arkansas Regional Planning and the University of Arkansas Cooperative Extension Service, Cooperative Extension service employees will provide training at least once a year to MS4s. The training will use materials provided by ExCal Visuals and others that include information on construction sites, park & open space maintenance, and fleet & building maintenance. Jurisdictional-specific policies will also be addressed during these trainings and specific system maintenance as departmentally appropriate. Training will stress how the employees are the “eyes and ears” of the City and that they should learn to recognize signs of illicit discharge and how to properly report these instances. Recommendations from the employees are also addressed during the regional stormwater compliance committee’s monthly meetings, and these recommendations help to shape the educational outreach messages.
- Attend employee training as required by the NPDES permit

OM2 Municipal Facility Inspections

Measurable Goals:

- Municipal non-industrial stormwater permit sites:
 - Add to the O&M Manual a list of municipal facilities/operations impacted by the O&M program. *Note that there are no known industrial facilities owned or operated by the City as of June 2024 that are required to be tracked and inspected by the City.*
 - Annual inspections for municipal facilities/operations impacted by the O&M program that do not require *industrial stormwater permit coverage*. These non-industrial permit sites are defined as sites that perform maintenance activities on mechanical equipment, facilities with fueling stations, facilities involved in waste storage, transfer or recycling, facilities with material stockpiles, and facilities storing fertilizers or pesticides.
- If, in the future, Industrial Stormwater Permits are required of any of the City’s municipal sites, list said site(s) in the O&M Manual and develop procedures for inspecting these sites.
- Continue to perform, at a minimum, once yearly inspections of all municipal facilities requiring inspections.

OM3 Maintenance Program

Measurable Goals:

- Continue to have the Street departments report its MS4 maintenance activities to the Planning Commission Secretary and City Contract Engineer.

OM4 Road Salt, Pesticide, Herbicide, and Fertilizer Usage

Measurable Goals:

- Utilize the City’s Operations & Management Manual and make any needed changes to the Manual when/if needed.

OM5 Street Sweeping for Stormwater Pollution Control

Measurable Goals:

- Continue following the City’s street sweeping program.

Responsible Departments

The City's Street department is the city entity responsible for MS4 maintenance including salt, pesticides, herbicides, fertilizer, and street sweeping. This department is also largely responsible for inspections of the city's municipal facilities.

Performance Standards

The performance of this BMP can be determined by whether or not methods can be employed to keep salt, pesticide, herbicide, and/or fertilizer usage by the City to a minimum, if proper procedures are followed in utilizing them, if annual facility inspections show that the City is maintaining their facilities properly, and if City employees learn from the public education sessions. However, another way to gauge this BMP's success is if the City has already carried all of these measures out and simply needs to maintain their procedures.

**Minimum Control Measure #6:
Pollution Prevention / Good Housekeeping for Municipal Operations
5 Year Implementation Schedule of Measurable Goals**

BMP#	PERMIT YEAR				
	2025	2026	2027	2028	2029
OM1	Operation and Maintenance Program				
	Continue coverage of this BMP under the educational memorandum of understanding with the University of Arkansas Cooperative Extension Service. Continue to have applicable staff attend employee training as required by the NPDES permit				
OM2	Municipal Facility Inspections				
	To the O&M Manual, add the following: 1. List of any industrial facilities owned or operated by the City. 2. List of City facilities/operations impacted by the O&M manual and those that receive yearly MS4 inspections.		If new sites need to be listed in the O&M Manual or if new guidelines are needed, add them to the O&M Manual.		
	Continue to perform, at a minimum, once yearly inspections of all municipal facilities requiring inspections.				
Continue utilizing the facility inspection form.					
OM3	Maintenance Program				
	Have the Street Department report its MS4 maintenance activities to the Planning Commission Secretary and City Contract Engineer.				
OM4	Road Salt, Pesticide, Herbicide, & Fertilizer Usage				
	Utilize the City's O&M Manual and make any needed changes to the Manual when/if needed. Utilize the O&M Manual				
OM5	Street Sweeping				
	Continue following the City's street sweeping program.				