PART C – STORM WATER MANAGEMENT PROGRAM PARTNERS

The City of Excelsior Springs is a member of the Mid America Regional Council (MARC) Water Quality Education Committee (WQEC) and utilizes MARC's services to augment their local public outreach and education programs. While MARC augments the City's programs, it neither solely operates nor implements any BMP for Excelsior Springs. The City is not working towards the development of an integrated plan. The primary point of contact for MARC is Tom Jacobs (Environmental Programs Director). His contact information:

Email: tjacobs@marc.org Phone #: 816-474-4240

Address: 600 Broadway, Suite 200, Kansas City, MO 64105

PART D-MINIMUM CONTROL MEASURES, BEST MANAGEMENT PRACTICES, AND MEASURABLE GOALS EVALUATION

MCM 1. Public Education and Outreach

1. (4.1.A) Who are the target audiences? **Residents and Detention Basin Owners**

Were any changes made to target audiences during reporting period? **No**

2.(4.1.B) What are the target pollutants? <u>Common urban stormwater pollutants</u> (HHW, IDDE, Car Washing and Yard Waste) and pollutants associated with land <u>development</u>

Were any changes made to target pollutants during reporting period? **No**

- 3.(4.1.C) Were any changes made to educational resources to be used as BMPs (materials, postings, etc.) in conjunction with the selected pollutants for the selected target audiences during reporting period? If Yes, please include an attachment describing changes. **No**
- 4.(4.1.D, 4.1.E) Were any changes made to involvement activities, or support to be used as BMPs (events, activities, etc.) in conjunction with the selected pollutants for the selected target audiences during reporting period? If Yes, please include an attachment describing changes. **No**
- 5. (4.1.F) Were all BMPs for MCM 1 evaluated during reporting period? If No, please include an attachment describing what BMPs were not evaluated and why. **Yes**
- 6. Were the measurable goals for all BMPs for MCM 1 successfully reached? If No, were the measurable goals or BMPs evaluated/modified in an effort for success in the next reporting period? **Yes**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

- The City's stormwater information web pages were up all year. The stormwater quality page had 404 page views, the stormwater resources page has 601 page views, the waterways information page had 891 page views, and the Fishing River Downtown page had 357 page views in 2023. MARC stormwater quality information was available on their web site and linked from the City's web site. The following pdf files were downloaded: Designing a rain garden (441 downloads), Rain garden planting (170 downloads), SWMP (158 downloads), Biennial/Annual Reports (81 downloads) and the Fishing River Watershed Study Open House (141 downloads).
- The City's Stormwater Education Facebook page has 50 followers. Public education on stormwater quality topics was posted quarterly on Facebook:
 - January 26, 2023 "Follow the Flow, Where Does It Go?" (IDDE) 3 likes, 2 shares
 - April 28, 2023 "Where it Flows, Everything Goes" (IDDE) 3 likes, 2 shares
 - July 7, 2023 "Where it Flows, Everything Goes" (Pet Waste) 1 like,
 1 share
 - November 6, 2023 Yard Waste
 - November 13, 2023 Yard Waste 2 likes, 1 shares
- In recent years, Boy Scouts marked 286 inlets (of the total 337 inlets = 85%) with a combination of marking disks and stenciled messages. In 2023, 37 were remarked with an additional 35 field-verified that the markings were still legible and intact. Also in more recent years, new storm inlets added to the MS4 have been installed with the casting marked with the "No dumping" message. However, in 2023, no new MS4 inlets were constructed and accepted into the City's system for maintenance (though a subdivision is currently under construction).
- Paid the annual fee for the MARC water quality committee in March 2023
 (\$1150). The City stormwater coordinator keeps a file of the various
 educational pamphlets from MARC to hand out based on the types of
 issues he encounters while completing his duties. The Stormwater
 Coordinator also has joined the MARC Water Quality Committee to improve
 the voice of the small MS4 communities in order for the program to better
 benefit Excelsior Springs.

- Hosted a cleanup event along the Fishing River and its tributaries as part of an Earth Day celebration April 22, 2023. Approximately 3 miles of riverbank/streambank (and much of the contributing watershed in the downtown area) were cleaned by 57 volunteers resulting in the collection of 55 large (55 gallon) bags of trash, 20 smaller mesh stream cleanup bags of trash, 3 tires, and 10 large pickup truck (F550) loads of bulky items. City staff organized and advertised the event and provided all of the trash disposal. In conjunction with this event, 600 middle schoolers spent 1.25 hours doing additional cleanup (though metrics for this effort were not collected). The Parks Department estimated this at over \$29,000 of cleanup efforts.
- Yard waste was collected from March 1 to November 30 on Fridays, Saturdays and Sundays from 8:00 A.M. to 3:00 P.M. There was no grinding of the yard waste during this reporting period. Typically, this is done every one to three years based on the volume collected and a large amount was hauled off in 2022.
- Encouraged citizens to utilize the various permanent and mobile locations for household hazardous waste dropoff around the Kansas City metro area. The City web site has a link to the RecycleSpot.org web site where information about HHW can be taken. During this reporting period, 13,855 pounds of HHW waste were collected from Excelsior Springs citizens (dropped off by 111 cars). Also, 7 volunteers from the Public Works Department attended and assisted with the mobile collection in Richmond in September 2023.
- Met with 4 owners of existing post-construction stormwater BMPs to educate each on the operation and maintenance requirements of their BMPs.
- 7. Were the BMPs for MCM 1 determined effective/successful for this reporting period? If No, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? **Yes**
- 8. Were any changes made to MCM 1 during the reporting period that were not covered above, including the addition of programmatic BMPs? If Yes, please include an attachment describing changes. **No**

MCM 2. Public Involvement and Participation

3. (4.2.D) Were any changes to publicly available method to accept public inquiries, or concerns, and to take information provided by the public about stormwater and

stormwater related topics made during reporting period? If Yes, please include an attachment describing changes. **No changes**

- 4. Were all BMPs and tracking methods for 4.2.D evaluated during reporting period? If No, please include an attachment describing what BMPs were not evaluated and why. **Yes**
- 5. (4.2.E) Does the permittee utilize a stormwater management panel or committee during the reporting period? If Yes, was the panel or committee determined to be effective/successful for this reporting period? If the permittee does not currently utilize a stormwater management panel or committee, did the permittee evaluate the potential benefits of utilizing a stormwater management panel or committee? No, the City does not have a stormwater management panel or committee. Yes, the City evaluated the potential benefits of utilizing a stormwater management committee and does not believe it makes sense for the City at this time.
- 6. Were any changes to 4.2.E made during reporting period? If Yes, please include an attachment describing changes. **No**
- 7. (4.2.F) On what date did the permittee provide an update to the governing board on the status of, or updates on, the Stormwater Management Program, including compliance with the program for this reporting period? **Update on program by Nate Convers at the City Council Meeting on March 20, 2023.**
- 8. (4.2.I) Were all tracking mechanisms and databases for MCM 2 evaluated during this reporting period? If No, please include an attachment describing why the mechanisms were not evaluated. **Yes**
- 9. Were the measurable goals for all BMPs for MCM 2 successfully reached? If No, were the measurable goals or BMPs evaluated/modified in an effort for success in the next reporting period? **Yes**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

Received 9 public inquires during the reporting period (all via phone call/voicemail). Seven were related to private property flooding issues and two were related to "sinkholes" from pipe or inlet failures. Staff met with 8 property owners in person and spoke with the other property owner on the phone. All necessary follow up (including two capital repairs/replacements) were completed.

10. Were the programmatic BMPs for MCM 2 determined effective/successful for this reporting period? If No, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? **Yes**

11. Were any changes made to MCM 2 during the reporting period that were not covered above, including the addition of programmatic BMPs? If Yes, please include an attachment describing changes. **No**

MCM 3. Illicit Discharge Detection and Elimination

- 1. (4.3.A) Were any changes to the storm sewer system map made during reporting period? **No (no new facilities constructed, no annexation)**
- 2. (4.3.C) Were any changes made to the ordinance for prohibition of non-stormwater into the storm sewer system during this reporting period? **No**
- 3. (4.3.D) Was the measurable goal for dry weather field screening met? If No, were the measurable goals evaluated/modified in an effort for success in the next reporting period? **Yes**
- 4. (4.3.H) Were the priority areas evaluated for this reporting period? If Yes, were the priority areas determined to be appropriate for the next reporting period? Will additional or new priority areas be identified for the next reporting period? Yes, they were evaluated. Yes, they are appropriate for the next reporting period. No new areas will be added at this time.
- 5. (4.3.J) Were any illicit discharge investigations conducted during this reporting period? If Yes, were the investigation procedures, response times, and tracking mechanisms determined to be appropriate for the next reporting? If No, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? Yes illicit discharge investigations were conducted during this reporting period. Yes investigation procedures, response times and tracking mechanisms appear to be appropriate.
- 6. (4.3.K) Were MCM 3 enforcement procedures evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 7. (4.3.L) Were all tracking mechanisms and databases for MCM 3 evaluated during this reporting period? If No, please include an attachment describing why the mechanisms were not evaluated. **Yes**
- 8. (4.3.M, 4.3.Q) Were all outreach and internal training procedures for MCM 3 evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**

9. Were the measurable goals for all BMPs for MCM 3 successfully reached? If No, were the measurable goals or BMPs evaluated/modified in an effort for success in the next reporting period? <u>Yes</u>

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

- 35 outfalls were dry weather field screened (25 within the priority areas); The total number of outfalls had previously been established as 84, but with recent training on the definition of outfall, it is expected that this total is much lower as many discharge points of the engineered stormwater collection system will not meet the legal definition of "MS4 Outfall". The discharge points will be used as "outfalls" until field-evaluated to verify which will be in the outfall total. Only two of the discharge points had dry weather flow. One turned out to be a leak on a potable water main. This line has been fixed. One turned out to be irrigation from upstream.
- Two illicit discharges were reported by the public and two were reported by City staff. All were investigated immediately and resolved. City provided personnel and equipment to assist with clean up as needed.
- 13,855 pounds of HHW collected
- 26 employees trained on illicit discharges
- Facebook post messages covered illicit discharge education (See MCM #1)
- Sanitary sewers were inspected for potential for exfiltration of waste that could impact the City's MS4. In 2023: 12,358 feet of sanitary sewers were inspected via CCTV.
- 10. (4.3.N -4.3.R) Were the programmatic BMPs for MCM 3 determined effective/successful for this reporting period? If No, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? **Yes**
- 11. Were any changes made to MCM 3 during this reporting period that were not covered above, including the addition of programmatic BMPs? If Yes, please include an attachment describing changes. **No**

MCM 4. Construction Site Stormwater Runoff Control

- 1. (4.4.A) Were any changes to the ordinance for construction site stormwater made during this reporting period? If Yes, please include an attachment describing changes. **No**
- 2. (4.4.B) Were the pre-construction plan review procedures evaluated during this reporting period? If No, please include an attachment describing why the review procedures were not evaluated. **Yes**

- 3. (4.4.C) Were the procedures for construction site inspections evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 4. (4.4.D) Were construction site enforcement procedures evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 5. (4.4.E) Were the procedures for requiring construction site operators to conduct site inspections evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 6. (4.4.F, 4.4.G) Were all tracking mechanisms and databases for MCM 4 evaluated during this reporting period? If No, please include an attachment describing why the mechanisms and/or databases were not evaluated. **Yes**
- 7. (4.4.J) Were all procedures for public submittal of concerns or information related to construction sites evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 8. (4.4.K) Were all internal training procedures for MCM 4 evaluated for effectiveness during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 9. (4.4.L) Were all procedures outlining the local inspection and enforcement for MCM 4 evaluated during this reporting period? If No, please include an attachment describing why the document(s) were not evaluated. **Yes**
- 10. Were the measurable goals for all programmatic BMPs for MCM 4 successfully reached? If No, were the measurable goals or programmatic BMPs evaluated/modified in an effort for success in the next reporting period? **Yes**

For each of the programmatic BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

- Continued pre-construction plan review of new and redevelopment projects disturbing more than one acre ensuring that selected BMPs are appropriate for the site. The City contract review engineer received and reviewed 7 sets of plans in 2023. This resulted in the issuance of 4 permits (3 still in the review process).
- Continued to receive and log any public input on construction site runoff control. During the reporting period, no complaints were received in regard to 6 active sites. Staff believes that this is directly correlated to the

- ongoing education efforts by meeting with contractors early in the construction process to ensure they understand the permit requirements and inspectors' expectations.
- Continued to require weekly contractor self-inspections of active construction sites that result in land disturbance of greater than or equal to one acre and any smaller land disturbances if part of a greater plan or sale that would exceed the one-acre threshold in aggregate.
- In 2023, 78 site inspection visits to 6 active construction sites were completed by the Stormwater Coordinator on grading permits. During this same period, Code Enforcement staff performed 59 inspections on 18 active residential permits.
- Continued to take enforcement actions as necessary to ensure proper construction site runoff control on applicable sites. No written violation and 9 verbal warnings were issued by the Stormwater Coordinator on grading permits. Code Enforcement had 20 stormwater related violations on residential permits. All issues were corrected.
- Met with four different contractors on-site prior to each of their projects starting to explain expectations for construction site runoff control.
- 11. (4.4.H, 4.4.I, 4.4.M) Were the programmatic BMPs and procedures for MCM 4 determined effective/successful for this reporting period? **Yes**
- 12. Were any changes made to MCM 4 during the reporting period that were not covered above, including the addition of programmatic BMPs? If Yes, please include an attachment describing changes. **No**

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

- 1. (4.5.A) Were any changes to the ordinance for post-construction runoff site stormwater made during this reporting period? If Yes, please include an attachment describing changes. **No**
- 2. (4.5.B) Were any changes to the permittee's strategy to minimize water quality impact made during this reporting period? This includes any policy or ordinance changes to either structural or non-structural controls. If Yes, please include an attachment describing changes. **No**
- 3. Were all strategies (programmatic BMPs) for 4.5.B evaluated during this reporting period? If No, please include an attachment describing what BMPs were not evaluated and why. **Yes**

- 4. (4.5.C) Were the pre-construction plan review procedures evaluated during this reporting period? If No, please include an attachment describing why these procedures were not evaluated. **Yes**
- 5. (4.5.D) Were procedures for long-term operation and maintenance of the post-development BMPs evaluated during this reporting period? If No, please include an attachment describing why these procedures were not evaluated. **Yes**
- 6. (4.5.E) Were the procedures for inspections or requiring inspections, evaluated during this reporting period? If No, please include an attachment describing why these procedures were not evaluated. **Yes**
- 7. Were the measurable goals for all BMPs for 4.5.E successfully reached? If No, were the measurable goals evaluated/modified in an effort for success in the next reporting period? **Yes**
- 8. (4.5.F, 4.5.G) Were compliance and enforcement procedures evaluated during this reporting period? If No, please include an attachment describing what BMPs were not evaluated and why. **Yes**
- 9. (4.5.H) Was the inventory of all post-construction BMPs, including the tracking mechanism, evaluated during this reporting period? If No, please include an attachment describing why these procedures were not evaluated. **Yes**
- 10. (4.5.I) Were all tracking mechanisms for post-construction BMP inspections, including the tracking mechanism, evaluated during this reporting period? If No, please include an attachment describing why these procedures were not evaluated. **Yes**
- 11. (4.5.L) Were all training procedures for inspections evaluated for effectiveness during this reporting period? No, please include an attachment describing why these procedures were not evaluated. **Yes**
- 12. Were the measurable goals for all programmatic BMPs for MCM 5 successfully reached? If No, were the measurable goals or programmatic BMPs evaluated/modified in an effort for success in the next reporting period? **Yes**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

 Continued to utilize the various requirements for quantity and quality control on new and redevelopment projects found within the UDO and stormwater ordinances as well as the design criteria located in KC APWA Section 5600 Stormwater Design Criteria and KC APWA/MARC Manual of Best Management Practices for Stormwater Quality. In 2023, 7 plans for new or redevelopment that included post-construction structural BMPs were reviewed, and 4 permits were issued for construction. This resulted in the construction of one rain garden and one underground detention storage facility. Additionally, an existing wet storage basin was improved to provide additional capacity for the community center project. Each of these BMPs were inspected during construction and upon completion.

- Continued to require long term operation and maintenance of postconstruction BMPs through the execution of recorded maintenance covenants and an annual inspection of all existing BMPs. In 2023: two maintenance agreement were executed and recorded with Clay County.
- 53 existing post-construction BMP inspections were completed. Two
 facilities had violations (mostly minor mowing and/or litter issues though
 one had silt fence that had never been removed following construction).
 Both were corrected following verbal warnings.
- 13. (4.5.J, 4.5.K, 4.5.M) Were programmatic BMPs and procedures for MCM 5 determined effective/successful for this reporting period? If No, were the programmatic BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? **Yes**
- 14. Were any changes made to MCM 5 during the reporting period that were not covered above, including the addition of programmatic BMPs? If Yes, please include an attachment describing changes. **No**

MCM 6. Pollution Prevention/Good Housekeeping for Municipal Operations

- 1. (4.6.A) Did the permittee maintain and utilize an employee training program for MS4 municipal operations staff? What date or dates was the training held during this reporting period? **26 employees trained in July 2023**
- 2. Were any changes to the training program made during reporting this period? If Yes, please include an attachment describing changes. **No**
- 3. (4.6.B) Were the following topics covered during training for this reporting period?
- Vehicle and equipment washing Yes
- •Fluid disposal and spills **Yes**
- •Fleet, equipment, and building maintenance Yes
- •Park, open space maintenance procedures (including fertilizer, herbicide, pesticide application) **Yes**
- •New construction, road maintenance, and land disturbances Yes
- •Stormwater system maintenance Yes

- •MS4 operated salt and de-icing operations Yes
- •Fueling Yes
- •Solid waste disposal **Yes**
- •Street sweeper operations Yes
- •Illicit Discharges Yes
- 4. (4.6.C) Were training materials, written procedures for the training program, and a schedule for topics evaluated during this reporting period? If No, please include an attachment describing what BMPs were not evaluated and why. **Yes**
- 5. (4.6.D) Was a list of municipal operations/facilities impacted by the MS4 permit maintained and evaluated during this reporting period? **Yes**
- 6. (4.6.E) Was a list of all industrial facilities owned or operated by the permittee which are subject to NPDES permits for discharges of stormwater associated with industrial activity, maintained and evaluated during this reporting period? **Yes**
- 7. (4.6.F) Were controls and procedures for reducing or eliminating the discharge of floatables and pollutants from municipal facilities evaluated during this reporting period? If No, please include an attachment describing what elements and procedures were not evaluated and why. **Yes**
- 8. Were inspections conducted on these facilities at minimum annually? Yes
- 9. Were the stormwater control measures and other programmatic BMPs for 4.6.E determined effective/successful for this reporting period? If No, were the BMPs, and procedures determined to be ineffective/unsuccessful evaluated for modification or replacement? **Yes**
- 10. (4.6.G) Were procedures for proper disposal of waste removed from the MS4 structures and areas of jurisdiction evaluated during this reporting period? If No, please include an attachment describing why the procedures were not evaluated. **Yes**
- 11. (4.6.H) Was washing of municipal vehicles and/or equipment taking place on a facility owned and/or operated by the permittee during this reporting period? If Yes, were procedures for proper disposal of wash water evaluated during this reporting period? If No, please include an attachment describing what procedures were not evaluated and why. Yes, there was washing of City vehicles/equipment at City facilities. Yes, standard operating procedures were followed for proper disposal of wash waters.
- 12. (4.6.I) Did the permittee maintain written Stormwater Pollution Prevention Plans or an Operations and Maintenance Manual for all applicable MS4 facilities during this reporting period? If No, please include an attachment describing why the document(s) were not created and/maintained. No. Staff used Good Housekeeping Standard Operating Procedures and more site specific SWPPPs were begun, but not

finished during the reporting period. They will be finished early in the next reporting period.

- 13. Did the permittee evaluate the results, controls, and inspection procedures to ensure compliance with the permit and determine if changes are needed? This evaluation may also aid in finding priority areas or pollutants in relation to MCM 3, or adding more education in relation to MCM 1. If No, please include an attachment describing what BMPs were not evaluated and why. **Yes**
- 14. (4.6.J) Were any new flood management projects reviewed or begun during this reporting period? If Yes, were procedures used to determine if there are impacts to water quality for the new project? **No**
- 15. Were the measurable goals for all BMPs for MCM 6 successfully reached? If No, were the measurable goals evaluated/modified in an effort for success in the next reporting period? **Yes**

For each of the BMPs under this MCM, please provide a brief summary of how the measurable goals were achieved and documented. For any BMPs where the measurable goals were not achieved, provide a brief summary of how the BMP evaluated/modified in an effort for success in the coming reporting year.

- Continued to provide employee training on stormwater quality protection.
 In 2023: 26 employees were trained on stormwater SOPs (July).
- Continued to perform maintenance activities on the MS4. Generally, there
 are approximately 25 grated inlets that tend to clog with leaves and other
 waste that are checked after rain events and cleaned.
- Continued to sweep streets to reduce pollutant loads. In 2023: 584 miles were swept.
- Two hundred tons of salt was purchased for the 2022-2023 snow season.
 The pad outside the salt barn was swept after each snow event.
 Additionally, the barn had been noted as in need of replacement on a previous MDNR inspection. The construction of a new salt storage shed was completed in July 2022. The new salt storage shed is more watertight. The old storage shed now houses stockpiles of soil and sand that had previously been stored more open to the elements.
- Continued to have the grit chambers in the maintenance facility cleaned out regularly. Heritage-Crystal Clean LLC cleaned it out twice (April and October).
- Continued tire recycling. These are stored until a complete load can be picked up. A pickup of 268 tires was made on March 31, 2023.
- Continued to perform inspections of city maintenance facilities. In 2023: all City maintenance facilities were inspected twice each. This included:

Public Works and Golf Course. Minor deficiencies were noted and corrected immediately.

- Continued to dispose of waste from the MS4 and other maintenance activities appropriately in dumpsters.
- The mowing crew picked up 113 bags of trash from City rights-of-way.
- There were no new flood control projects to be reviewed for potential water quality impacts during this reporting period.
- Aging fuel pumps at the Public Works Maintenance Facility were leaking and were replaced in 2023. During this project, the underground storage tanks for the fuel system were verified to be in good working order.
- SWPPPs for the maintenance facilities have been started but were not completed during the reporting period. However, staff have continued to use SOPs for all related maintenance activities that occur at these facilities. The SWPPP documents will simply provide additional site-specific details and maps.

16.(4.6.K, 4.6.L, 4.6.M) Were BMPs for MCM 6 determined effective/successful for this reporting period? If No, were the BMPs determined to be ineffective/unsuccessful evaluated for modification or replacement? **Yes**

17. Were any changes made to MCM 6during the reporting period that were not covered above? If Yes, please include an attachment describing changes. **No**