

**TRAVIS COUNTY WATER CONTROL AND IMPROVEMENT
DISTRICT No. 17**

**STORMWATER MANAGEMENT PROGRAM
TPDES PHASE II MS4 GENERAL PERMIT (TXR040000)**

Prepared by

Travis County Water Control and Improvement District No. 17

October 1, 2024

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STORMWATER MANAGEMENT PROGRAM
TPDES PHASE II MS4 GENERAL PERMIT
(TXR040000) October 1, 2024

SUMMARY

MS4 Name:	Travis County Water Control and Improvement District 17
Entity Type:	Water Control and Improvement District
Executive Officer:	Jeff Roberts, President, Board of Directors
Designated Signer:	Jason F. Homan, General Manager / Chief Executive Officer
Mailing Address:	3812 Eck Lane, Austin, TX 78734
Physical Address:	3812 Eck Lane
City:	Austin
State:	Texas
Zip Code:	78734
Phone Number:	(512) 266-1111
Fax Number:	(512) 266-2790
Population:	Approximately 50,000
Operator Level:	Level 2B Non-Traditional

Table of Contents

Introduction	4
Plan Development	5
MS4 Boundary Map	7
Definitions	8
MCM 1 – Public Education and Outreach	16
MCM 2 – Public Involvement and Participation	21
MCM 3 – Illicit Discharge Detection and Elimination (IDDE)	23
MCM 4 – Construction Site Stormwater Runoff Control	30
MCM 5 – Post-Construction Stormwater Management in New Development and Redevelopment	37
MCM 6 – Pollution Prevention and Good Housekeeping for Municipal Operations	40

Introduction

The U.S. Environmental Protection Agency (EPA) issued regulations to protect stormwater quality in urbanized areas. In Texas, the Texas Commission on Environmental Quality (TCEQ) was delegated the responsibility for implementing these regulations, commonly referred to as the Phase II Stormwater Program. WCID No. 17 is one of the many public entities required to develop a program that protects stormwater quality under the Phase II regulations.

Phase II MS4s are categorized by population size:

Level 1: Operators of traditional small MS4s that serve a population of less than 10,000 within an “urban area with a population of at least 50,000 people”.

Level 2A: Operators of traditional small MS4s that serve a population of at least 10,000 but less than 40,000 within an “urban area with a population of at least 50,000 people”.

Level 2B: Operators of all non-traditional small MS4s such as counties, drainage districts, transportation entities, military bases, universities, colleges, correctional institutions, municipal utility districts and other special districts regardless of population served within the “urban area with a population of at least 50,000 people”, unless the non-traditional MS4 can demonstrate that it meets the criteria for a waiver from permit coverage based on the population served.

Level 3: Operators of traditional small MS4s that serve a population of at least 40,000 but less than 100,000 within an “urban area with a population of at least 50,000 people”.

Level 4: Operators of traditional small MS4s that serve a population of 100,000 or more within an “urban area with a population of at least 50,000 people”

According to the results of the 2020 Census, WCID No. 17 is categorized as a **Level 2B MS4**.

WCID No. 17 developed this Stormwater Management Program (SWMP) in compliance with the Texas Pollutant Discharge Elimination System (TPDES) General Permit TXR040000 which was put in place on August 15th, 2024. The SWMP helps ensure that WCID No. 17 reduces pollutants in stormwater runoff from its MS4 to protect water quality to the maximum extent practicable (MEP).

This SWMP includes specific best management practices (BMPs) aimed at minimizing pollutants, measurable goals for each BMP, and an implementation schedule for the five-year permit term. These BMPs were developed for each of the applicable minimum control measures (MCMs) required by the Phase II Rule.

The eight MCMs are as follows:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination (IDDE)
4. Construction Site Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment
6. Pollution Prevention and Good Housekeeping for Municipal Operations
7. Industrial Stormwater Sources
8. Authorization for Construction Activities where the Small MS4 is the Site Operator

The seventh MCM, which addresses Industrial Stormwater Sources, has not been included in this SWMP as it is only required for Level 4 small MS4s. Additionally, the optional eighth MCM, which provides authorization for construction activities where the small MS4 is the site operator, has not been selected for inclusion in this SWMP.

By submitting a SWMP and a Notice of Intent (NOI) to comply with the TPDES Phase II regulations, WCID No. 17 acknowledges the regulatory authority of the TCEQ and agrees to meet the requirements of TPDES General Permit TXR040000 for direct discharges into surface waters. This permit will remain valid for five years from the date of issuance. An annual report detailing compliance with the SWMP will be submitted to the TCEQ.

Plan Development

The development of the WCID No. 17 Stormwater Management Program (SWMP) was guided by a commitment to creating an effective, compliant, and cost-efficient plan that meets the requirements of the Texas Pollutant Discharge Elimination System (TPDES) Small MS4 General Permit. WCID No. 17 recognized the importance of building on existing stormwater related efforts and practices to fulfill the requirements of the permit and reduce pollutants to the maximum extent practicable (MEP).

WCID No. 17 has assessed its current stormwater practices and programs, aligning them with the six Minimum Control Measures (MCMs) specified in the TPDES general permit. Where existing programs were already contributing to stormwater quality, they were incorporated into the SWMP as part of the best management practices (BMPs) to meet compliance. Additional BMPs were carefully selected to complement existing efforts and to ensure comprehensive coverage of all general permit requirements.

The selection of BMPs, measurable goals, and the corresponding implementation schedule was based on a practical approach. Input was sought from various departments and staff members who will be responsible for carrying out the activities associated with the BMPs. WCID No. 17 prioritized BMPs and goals that were deemed necessary, achievable, and in line with the resources available to ensure compliance with permit requirements while managing costs effectively.

To further ensure the effectiveness of the SWMP, WCID No. 17 has implemented a system for regular evaluation and monitoring of both BMP implementation and the achievement of measurable goals. This includes setting up annual reviews of the SWMP's progress and making adjustments where needed based on findings. Feedback from relevant staff members will be incorporated into this review to identify opportunities for improvement or areas where resources may need to be reallocated. The District GM/CEO is ultimately responsible for overseeing the entire SWMP, ensuring that it is continuously evaluated, and making any necessary adjustments to maintain compliance and optimize stormwater management efforts. By integrating these evaluations and adjustments, WCID No. 17 ensures the program is responsive to changes and challenges while maintaining its focus on achieving the goals set forth in the permit.

The costs of implementing each BMP and meeting the measurable goals will be reviewed annually, with adjustments to the BMPs and the implementation schedule being made as needed to maintain compliance with the permit and respond to emerging needs or challenges. WCID No. 17 is committed to ensuring that all BMPs are cost effective while delivering measurable improvements in stormwater quality. This approach allows WCID No. 17 to adapt to changing conditions and priorities while staying in compliance with the TPDES MS4 permit.

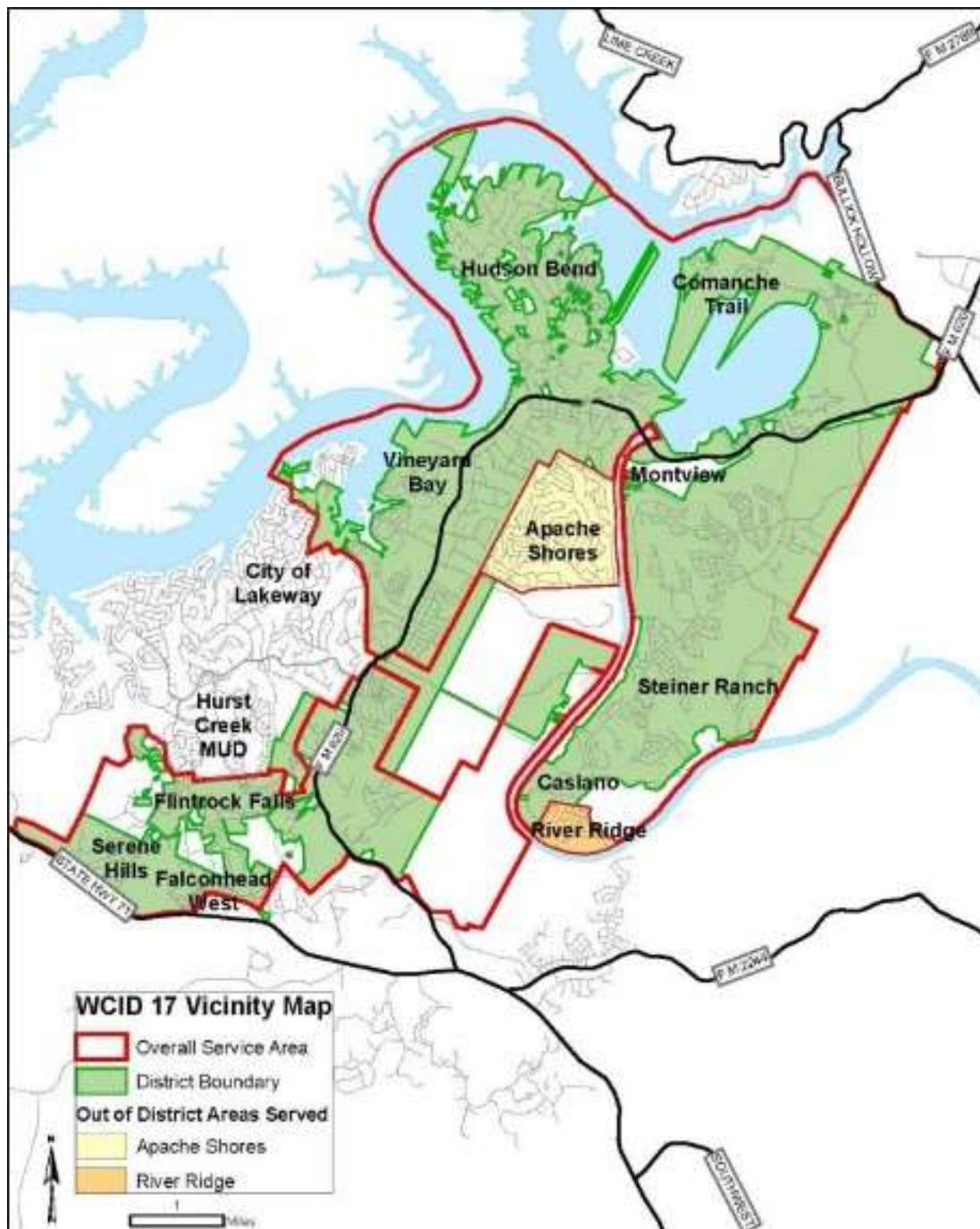
The implementation schedule for the BMPs and measurable goals follows a structured timeline, with each permit year aligned as follows:

Permit Year	Calendar Year
Year 1	2025
Year 2	2026
Year 3	2027
Year 4	2028
Year 5	2029

This schedule ensures that all tasks are completed within the TPDES permit cycle and allows WCID No. 17 to track progress annually, report on achievements, and make adjustments as necessary to maintain compliance and optimize stormwater quality efforts.

MS4 Boundary Map

The following map illustrates the jurisdictional boundaries of WCID No. 17's Municipal Separate Storm Sewer System (MS4). These boundaries define the areas where WCID No. 17 is responsible for implementing the Stormwater Management Program (SWMP) and ensuring compliance with the Texas Pollutant Discharge Elimination System (TPDES) General Permit. The map helps to clarify the geographic scope of the MS4 and the areas subject to stormwater quality management under this permit.



Definitions

Arid Areas – Areas with an average annual rainfall of less than ten inches.

Benchmarks – A benchmark pollutant value is a guidance level indicator that helps determine the effectiveness of chosen best management practices (BMPs). This type of monitoring differs from “compliance monitoring” in that exceedances of the indicator or benchmark level are not permit violations, but rather indicators that can help identify problems at the Municipal Separate Storm Sewer System (MS4) with exposed or unidentified pollutant sources; or control measures that are either not working correctly, whose effectiveness need to be re-considered, or that need to be supplemented with additional BMP(s).

Best Management Practices (BMPs) – Schedules of activities, prohibitions of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spills or leaks, waste disposal, or drainage from raw material storage areas.

Catch Basins – Storm drain inlets and curb inlets to the storm drain system. Catch basins typically include a grate or curb inlet that may accumulate sediment, debris, and other pollutants.

Classified Segment – A water body that is listed and described in Appendix A or Appendix C of the Texas Surface Water Quality Standards, at 30 Texas Administrative Code (TAC) § 307.10.

Clean Water Act (CWA) – The Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. 96-483, and Pub. L. 97-117, 33 U.S.C. 1251 et. seq.

Common Plan of Development or Sale – A construction activity that is completed in separate stages, separate phases, or in combination with other construction activities. A common plan of development or sale is identified by the documentation for the construction project that identifies the scope of the project, and may include plats, blueprints, marketing plans, contracts, building permits, a public notice or hearing, zoning requests, or other similar documentation and activities.

Construction Activity – Soil disturbance, including clearing, grading, excavating, and other construction related activities (e.g., stockpiling of fill material and demolition); and not including routine maintenance that is performed to maintain the original line and grade, hydraulic capacity, or original purpose of the site (e.g., the routine grading of existing dirt roads, asphalt overlays of existing roads, the routine clearing of existing right-of-ways, and similar maintenance activities). Regulated construction activity is defined in terms of small and large construction activity.

Small Construction Activity is construction activity that results in land disturbance of equal to or greater than one acre and less than five acres of land. Small construction activity also includes the disturbance of less than one acre of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than one and less than five acres of land.

Large Construction Activity is construction activity that results in land disturbance of equal to or greater than five acres of land. Large construction activity also includes the disturbance of less than five acres of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than five acres of land.

Construction Site Operator – The entity or entities associated with a small or large construction project that meet(s) either of the following two criteria:

- (a) The entity or entities that have operational control over construction plans and specifications (including approval of revisions) to the extent necessary to meet the requirements and conditions of this general permit; or
- (b) The entity or entities that have day-to-day operational control of those activities at a construction site that are necessary to ensure compliance with a stormwater pollution prevention plan (SWP3) for the site or other permit conditions (for example they are authorized to direct workers at a site to carry out activities required by the SWP3 or comply with other permit conditions).

Control Measure – Any BMP or other method used to prevent or reduce the discharge of pollutants to water in the state.

Conveyance – Curbs, gutters, man-made channels and ditches, drains, pipes, and other constructed features designed or used for flood control or to otherwise transport stormwater runoff.

Discharge – When used without a qualifier, refers to the discharge of stormwater runoff or certain non-stormwater discharges as allowed under the authorization of this general permit.

Edwards Aquifer – As defined in 30 TAC § 213.3 (relating to the Edwards Aquifer), that portion of an arcuate belt of porous, water-bearing, predominantly carbonate rocks known as the Edwards and Associated Limestones in the Balcones Fault Zone trending from west to east to northeast in Kinney, Uvalde, Medina, Bexar, Comal, Hays, Travis, and Williamson Counties; and composed of the Salmon Peak Limestone, McKnight Formation, West Nueces Formation, Devil's River Limestone, Person Formation, Kainer Formation, Edwards Formation, and Georgetown Formation. The permeable aquifer units generally overlie the less-permeable Glen Rose Formation to the south, overlie the less-permeable Comanche Peak and Walnut Formations north of the Colorado River, and underlie the less-permeable Del Rio Clay regionally.

Edwards Aquifer Recharge Zone – Generally, that area where the stratigraphic units constituting the Edwards Aquifer crop out, including the outcrops of other geologic formations in proximity to the Edwards Aquifer, where caves, sinkholes, faults, fractures, or other permeable features would create a potential for recharge of surface waters into the Edwards Aquifer. The recharge zone is identified as that area designated as such on official maps located on the TCEQ website or in the offices of the TCEQ.

Final Stabilization – A construction site where any of the following conditions are met:

(a) All soil disturbing activities at the site have been completed and a uniform (for example, evenly distributed, without large bare areas) perennial vegetative cover with a density of 70 percent (%) of the native background vegetative cover for the area has been established on all unpaved areas and areas not covered by permanent structures, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geotextiles) have been employed.

(b) For individual lots in a residential construction site by either: (1) The homebuilder completing final stabilization as specified in condition (a) above; or (2) The homebuilder establishing temporary stabilization for an individual lot prior to the time of transfer of the ownership of the home to the buyer and after informing the homeowner of the need for, and benefits of, final stabilization.

(c) For construction activities on land used for agricultural purposes (for example pipelines across crop or range land), final stabilization may be accomplished by returning the disturbed land to its preconstruction agricultural use. Areas disturbed that were not previously used for agricultural activities, such as buffer strips immediately adjacent to a surface water and areas which are not being returned to their preconstruction agricultural use must meet the final stabilization conditions of condition (a) above.

(d) In arid, semi-arid, and drought-stricken areas only, all soil disturbing activities at the site have been completed and both of the following criteria have been met:

(1) Temporary erosion control measures (e.g., degradable rolled erosion control product) are selected, designed, and installed along with an appropriate seed base to provide erosion control for at least three years without active maintenance by the operator, and

(2) The temporary erosion control measures are selected, designed, and installed to achieve 70 percent (%) vegetative coverage within three years

General Permit – A permit issued to authorize the discharge of waste into or adjacent to water in the state for one or more categories of waste discharge within a geographical area of the state or the entire state as provided by Texas Water Code (TWC) § 26.040. Groundwater

Infiltration – For the purposes of this permit, groundwater that enters a municipal separate storm sewer system (including sewer service connections and foundation drains) through such means as defective pipes, pipe joints, connections, or manholes.

High Priority Facilities – High priority facilities are facilities with a high potential to generate stormwater pollutants. These facilities must include, at a minimum, the MS4 operator's maintenance yards, hazardous waste facilities, fuel storage locations, and other facilities where chemicals or other materials have a high potential to be discharged in stormwater. Among the factors that must be considered when giving a facility a high priority ranking are: the amount

of urban pollutants stored at the site, the identification of improperly stored materials, activities that must not be performed outside (for example, changing automotive fluids, vehicle washing), proximity to water bodies, proximity to sensitive aquifer recharge features, poor housekeeping practices, and discharge of pollutant(s) of concern to impaired water(s).

Hyperchlorinated Water – Water resulting from hyperchlorination of waterlines or vessels, with a chlorine concentration greater than 10 milligrams per liter (mg/L). **Illicit Connection** – Any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

Illicit Discharge – Any discharge to an MS4 that is not entirely composed of stormwater, except discharges pursuant to this general permit or a separate authorization and discharges resulting from emergency fire-fighting activities.

Impaired Water – A surface water body that is identified as impaired on the latest U.S. Environmental Protection Agency (EPA) approved Clean Water Act (CWA) § 303(d) List or waters with an EPA approved or established TMDL that are found on the latest EPA approved Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) which lists the category 4 and 5 water bodies.

Implementation Plan (I-Plan) – A detailed plan of action that describes the measures or activities necessary to achieve the pollutant reductions identified in the total maximum daily load (TMDL).

Indian Country – Defined in 18 U.S.C. § 1151 as:

- (a) All land within the limits of any Indian reservation under the jurisdiction of the United States (U.S.) Government, notwithstanding the issuance of any patent, and including rights-of-way running through the reservation;
- (b) All dependent Indian communities within the borders of the U.S. whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state; and
- (c) All Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same. This definition includes all land held in trust for an Indian tribe.

Indicator Pollutant – An easily measured pollutant, that may or may not impact water quality that indicates the presence of other stormwater pollutants. **Industrial Activity** – Any of the ten categories of industrial activities included in the definition of “stormwater discharges associated with industrial activity” as defined in 40 Code of Federal Regulations (CFR) § 122.26(b)(14)(i)-(ix) and (xi).

Infeasible – For the purpose of this permit, infeasible means not technologically possible, or not economically practicable and achievable in light of best industry practices. The TCEQ notes that it does not intend for any small MS4 general permit requirement to conflict with state water right laws.

Maximum Extent Practicable (MEP) – The technology-based discharge standard for MS4s to reduce pollutants in stormwater discharges that was established by the CWA § 402(p). A discussion of MEP as it applies to small MS4s is found in 40 CFR § 122.34.

MS4 Operator – For the purpose of this permit, the public entity or the entity contracted by the public entity, responsible for management and operation of the small municipal separate storm sewer system that is subject to the terms of this general permit.

Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

(a) Owned or operated by the U.S., a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over the disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under the CWA § 208 that discharges to surface water in the state;

(b) That is designed or used for collecting or conveying stormwater;

(c) That is not a combined sewer; and

(d) That is not part of a publicly owned treatment works (POTW) as defined in 40 CFR § 122.2.

Non-traditional Small MS4 – A small MS4 that often cannot pass ordinances and may not have the enforcement authority like a traditional small MS4 would have to enforce the stormwater management program. Examples of non-traditional small MS4s include counties, transportation authorities (including the Texas Department of Transportation), municipal utility districts, drainage districts, military bases, prisons, and universities.

Notice of Change (NOC) – A written notification from the permittee to the executive director providing changes to information that was previously provided to the agency in a Notice of Intent.

Notice of Intent (NOI) – A written submission to the executive director from an applicant requesting coverage under this general permit.

Notice of Termination (NOT) – A written submission to the executive director from a permittee authorized under a general permit requesting termination of coverage under this general permit.

Outfall – A point source at the point where a small MS4 discharges to Waters of the U.S. and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream or other Waters of the U.S. and are used to convey Waters of the U.S. For the purpose of this permit, sheet flow leaving a linear transportation system without channelization is not considered an outfall. Point sources such as curb cuts; traffic or right-of-way barriers with drainage slots that drain into open culverts, open swales, or an adjacent property, or otherwise not actually discharging into Waters of the U.S. are not considered an outfall.

Permittee – The MS4 operator authorized under this general permit.

Point Source – (from 40 CFR § 122.22) any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pollutant(s) of Concern (POCs) – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids (TSS), turbidity or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment of any water body that will receive a discharge from an MS4. (Definition from 40 CFR § 122.32(e)(3)).

Redevelopment – Alterations of a property that changed the “footprint” of a site or building in such a way that there is a disturbance of equal to or greater than one acre of land. This term does not include such activities as exterior remodeling, routine maintenance activities, and linear utility installation.

Semiarid Areas – Areas with an average annual rainfall of at least ten inches, but less than 20 inches.

Small Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

(a) Owned or operated by the U.S., a state, city, town, borough, county, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under CWA § 208;

(b) Designed or used for collecting or conveying stormwater;

(c) Which is not a combined sewer; (d) Which is not part of a POTW as defined in 40 CFR § 122.2; and

(e) Which was not previously regulated under a National Pollutant Discharge Elimination System (NPDES) or a Texas Pollutant Discharge Elimination System (TPDES) individual permit as a medium or large municipal separate storm sewer system, as defined in 40 CFR §§ 122.26(b)(4) and (b)(7).

This term includes systems similar to separate storm sewer systems at military bases, large hospitals or prison complexes, and highways and other thoroughfares. This term does not include separate storm sewers in very discrete areas, such as individual buildings. For the purpose of this permit, a very discrete system also includes storm drains associated with certain municipal offices and education facilities serving a nonresidential population, where those storm drains do not function as a system, and where the buildings are not physically interconnected to a small MS4 that is also operated by that public entity.

Stormwater and Stormwater Runoff – Rainfall runoff, snow melt runoff, and surface runoff and drainage.

Stormwater Associated with Construction Activity – Stormwater runoff from an area where there is either a large construction or a small construction activity.

Stormwater Management Program (SWMP) – A comprehensive program to manage the quality of discharges from the MS4.

Structural Control (or Practice) – A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in stormwater runoff. Structural controls and practices may include but are not limited to wet ponds, bioretention, infiltration basins, stormwater wetlands, silt fences, earthen dikes, drainage swales, vegetative lined ditches, vegetative filter strips, sediment traps, check dams, subsurface drains, storm drain inlet protection, rock outlet protection, reinforced soil retaining systems, gabions, and temporary or permanent sediment basins.

Surface Water in the State – Lakes, bays, ponds, impounding reservoirs, springs, rivers, streams, creeks, estuaries, wetlands, marshes, inlets, canals, the Gulf of Mexico inside the

territorial limits of the state (from the mean high water mark (MHW) out 10.36 miles into the Gulf), and all other bodies of surface water, natural or artificial, inland or coastal, fresh or salt, navigable or nonnavigable, and including the beds and banks of all water courses and bodies of surface water, that are wholly or partially inside or bordering the state or subject to the jurisdiction of the state. Waters in treatment systems which are authorized by state or federal law, regulation, or permit, and which are created for the purpose of waste treatment are not considered to be water in the state.

Total Maximum Daily Load (TMDL) – The total amount of a substance that a water body can assimilate and still meet the Texas Surface Water Quality Standards.

Traditional Small MS4 – A small MS4 that can pass ordinances and have the enforcement authority to enforce the stormwater management program. An example of traditional MS4s includes cities.

Urban Area – A statistical geographic entity consisting of a densely settled core created from census blocks and contiguous qualifying territory that together have at least 2,000 housing units or 5,000 persons as defined and used by the U.S. Census Bureau in the 2020 Decennial Census.

Urbanized Area (UA) – A retired statistical geographic entity type consisting of a densely settled core created from census tracts or blocks and adjacent densely settled territory that together have a minimum population of 50,000 people which was used by the U.S. Census Bureau in the 2000 and the 2010 Decennial Census.

Waters of the United States – Waters of the United States or Waters of the U.S. means the term as defined in 40 CFR § 122.2.

Travis County Water Control and Improvement District No. 17
Stormwater Management Program
Phase II MS4 Permit No. TXR040000

Travis County Water Control and Improvement District No. 17

(512) 266-1111

October 1, 2024

I. MCM 1 – Public Education and Outreach

The Public Education and Outreach minimum control measure consists of Best Management Practices (BMPs) aimed at educating the public on the impacts of stormwater discharges on local water bodies and the steps individuals and organizations can take to reduce pollutants in stormwater runoff. WCID No. 17 is responsible for implementing an outreach program that distributes educational materials and conducts outreach activities targeting key groups within its service area, such as residents, staff, contractors, and additional audiences as appropriate. The BMPs selected for this measure focus on conveying targeted messages that address specific pollutants of concern and provide guidance on how these pollutants can be managed. Educational resources may include websites, social media, storm drain marking, newsletters, and public events, among others. Each BMP is designed to engage the public, raise awareness, and promote behaviors that help reduce stormwater pollution. The success of this measure will be evaluated through the achievement of measurable goals tied to each BMP.

Target Audience and Pollutants:

Being a non-traditional MS4, WCID No. 17 is required by the TPDES General Permit to target residents served, district staff, and outside contractors to enhance awareness and participation in stormwater management practices. The outreach program is tailored to inform these groups about the effects of stormwater pollution and encourage preventative actions such as proper trash disposal, reduction of illicit discharges, and adherence to district guidelines. By focusing on these target audiences, WCID No. 17 aims to foster a community wide effort in reducing pollutants – especially litter and yard waste – from entering local water systems and supporting broader water quality goals. *Specific target audiences and target pollutants can be seen in the table below.*

Target Audiences	Target Pollutants
District Residents	Yard Waste
District Staff	Litter, Trash Containment
Outside Contractors	Litter, Trash Containment

Public Transparency:

To promote transparency and compliance with TCEQ regulations, WCID No. 17 will ensure that the Stormwater Management Program (SWMP) and annual reports are readily accessible to the public. These documents will be posted on the district's public website no later than 30 days after the Notice of Intent (NOI) or Notice of Change (NOC) approval date, as well as within 30 days of the annual report due date. By making this information available, WCID No. 17 aims to keep residents, contractors, and board members informed about stormwater management efforts and progress, fostering community engagement and accountability in achieving local water quality objectives.

Best Management Practices:

1. Company Website

Measurable Goals:

- Maintain a webpage that provides current and accurate information on stormwater quality topics relevant to residents, contractors, and district staff.
- Conduct an annual review of the webpage to verify the accuracy of all information and the functionality of all links.
- Update the webpage as necessary to ensure year-round access to current resources and educational materials.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Conduct initial review of existing website materials Jun – Develop a list of subjects for inclusion Dec – Update the website with new stormwater quality information and resources based on the developed list
Years 2 – 5	Jun – Annually review and verify the accuracy of the webpage and functionality of all links Sep – Update as necessary based off of emerging issues and resident feedback

2. Social Media Campaign

Measurable Goals:

Post a minimum of four times each year on at least one social media platform, ensuring that:

- Each post addresses strategies for minimizing adverse stormwater impacts or improving the quality of stormwater runoff.
- Messages are seasonally appropriate and relevant to the target audience.
- At least one post is made per quarter, with all quarterly posts remaining visible for the full year.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Feb - Identify relevant topics to post, and create a tentative content calendar Mar – Post the first message Jun – Post the second message Sep – Post the third message Dec – Post the fourth message
Years 2 – 5	Mar – Post the first message Jun – Post the second message Sep – Post the third message Dec – Post the fourth message Regularly review engagement metrics to assess audience interaction; Adjust content as necessary based on these insights, and evaluate engagement strategies by examining successful campaigns from other municipalities for inspiration

3. Article Publishing

Measurable Goals:

- Develop a minimum of two articles each year that are group specific and address activities or pollutants of concern, ensuring the topics are seasonally appropriate for the target audience.
- Ensure articles are published in local newspapers or newsletters, or distributed electronically to effectively reach the intended audience.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jan – Identify key topics relevant to the community and seasonal events May – Draft and publish the first article Aug – Draft and publish the second article
Years 2 – 5	Jan – Review previous articles for effectiveness May – Publish first article, adjusting topic based on current community concerns, or seasonal issues Aug – Publish second article, adjusting topic based on current community concerns, or seasonal issues

4. Drain Labeling Program

Measurable Goals:

- Mark a minimum of 10% of all known stormwater inlets each year in high-impact or impaired areas within the MS4 jurisdiction.
- Once all stormwater inlets have been marked, inspect and maintain markers on at least 15% of these inlets annually.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Identify high-impact areas and impaired watersheds Sep – Mark 10% of inlets with "No Dumping – Drains to Creek" messages Dec – Inspect and maintain 15% of previously marked inlets
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Years 2 – 5	<p>Sep – Mark an additional 10% of stormwater inlets each year</p> <p>Dec – Continue inspecting and maintaining 15% of all marked inlets annually to ensure visibility and legibility</p>
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II. **MCM 2** – Public Involvement and Participation

The Public Involvement and Participation minimum control measure consists of Best Management Practices (BMPs) designed to encourage active involvement from the community in stormwater management efforts. This measure requires public participation in the development and implementation of the Stormwater Management Program (SWMP), ensuring that residents and other groups have opportunities to be directly involved. Activities such as household hazardous waste events, public events, and board meetings are examples of BMPs used to reduce pollutants in stormwater runoff while improving water quality. Each BMP is crafted to foster community engagement, increase awareness, and encourage pollution-reducing practices. The success of this measure will be assessed through the achievement of measurable goals set for each BMP, ensuring continuous improvement and meaningful contributions toward water quality protection.

Best Management Practices:

1. Public Education Displays

Measurable Goals:

- Set up an educational display or booth at least once annually at a public event, such as Public Safety Day, to provide information about stormwater management, water quality issues, and pollution prevention.
- Properly staff the booth, and provide interactive educational materials to engage attendees and increase public understanding of local stormwater issues.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	Attend and staff a stormwater educational booth or display at a minimum of one public event annually, such as Public Safety Day or a similar community gathering. Provide information on stormwater issues and pollution prevention methods Nov – Evaluate and update educational materials as needed to align with community needs and current water quality topics
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2. Public Input

Measurable Goals:

- Conduct at least one public survey annually to gather input on stormwater program implementation.
- Distribute the survey to at least 75% of the intended audience and develop a method to track and estimate audience reach to evaluate BMP effectiveness.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Sep – Design and distribute the first survey to the public, ensuring it reaches at least 75% of the intended audience; Develop a tracking system to estimate audience reach and gauge BMP effectiveness
Years 2 – 5	Jun – Annually review and update the survey to reflect current program implementation needs Sep – Distribute the updated survey to at least 75% of the intended audience each year; Use the tracking system to evaluate the effectiveness of survey distribution and report findings internally for program adjustments

3. Public Board Meeting

Measurable Goals:

- Conduct a board meeting annually to gather community input on stormwater program implementation. Ensure the event is accessible and publicized to at least 75% of the target audience.
- Collect and review feedback from attendees to identify areas for improvement in the program and address community concerns.
- Track and estimate attendance from the intended audience to gauge effectiveness and identify any outreach gaps.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	Host annual board meetings to provide program updates and gather feedback; Announce and promote each meeting to ensure a minimum of 75% of the intended audience is informed; Maintain a tracking system for attendance and outreach results, making improvements as needed to increase engagement
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III. MCM 3 – Illicit Discharge Detection and Elimination (IDDE)

The Illicit Discharge Detection and Elimination (IDDE) minimum control measure aims to detect and eliminate non-stormwater discharges into the MS4 that could harm water quality. The program includes developing and maintaining a detailed storm sewer system map, implementing public education efforts, and providing accessible reporting mechanisms for the public to identify illicit discharges. Additionally, it involves training MS4 field staff, establishing procedures for investigating, tracing, and eliminating the sources of illicit discharges, and responding to illegal dumping incidents. Regular inspections, complaint responses, and follow-up actions ensure effective enforcement. Success will be measured through the achievement of specific, measurable goals tied to each Best Management Practice (BMP) included in the program, ensuring ongoing compliance and water quality protection.

Impaired Waters Monitoring:

Currently, the district does not discharge into any water bodies identified as impaired on the latest TCEQ and EPA-approved CWA § 303(d) List or Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). As part of the annual reporting process, the district will verify whether any water bodies within its jurisdiction have been added to these lists. If impaired waters are identified, the district will comply with all applicable requirements under Part III.B of the TCEQ MS4 General Permit, including controlling discharges of pollutants of concern (POCs), modifying the SWMP, and documenting progress toward reducing POCs in its annual report.

Best Management Practices:

1. MS4 Map

Measurable Goals:

- Maintain an accurate MS4 map that reflects the current layout and features of the stormwater system, ensuring it is updated at least once annually.
- Review any changes to the MS4 area, including additions, removals, or modifications of stormwater features.
- Document all updates and any identified gaps or areas needing future mapping.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	Continually maintain a current and accurate MS4 map by reviewing the existing map annually to identify necessary updates based on changes in the stormwater system; Update the MS4 map to reflect any newly added, removed, or altered features within the system; Document all updates made to the MS4 map, including the rationale for changes and any gaps identified during the review
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2. Staff Training

Measurable Goals:

- Conduct annual training sessions for all MS4 field staff, ensuring that 100% of staff members who may encounter or observe illicit discharges, illegal dumping, or illicit connections receive the necessary training.
- Evaluate the effectiveness of the training through feedback and assessments, making adjustments to the content and delivery methods as needed.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jul – Develop training materials and schedule the first training session Oct – Conduct first training session, ensuring that all staff members complete the training
Years 2 – 5	Mar – Review and revise training materials annually, updating information based on the latest regulations and best practices Oct – Conduct annual training sessions for all field staff

3. Public Reporting Mechanisms

Measurable Goals:

- Maintain a public reporting method on the district website to allow the public to report illicit discharges, illegal dumping, or water quality issues, ensuring it remains active and accessible at all times.
- Publicize the reporting method twice a year through various channels, aiming to reach a significant portion of the intended audience.

- Implement a tracking system to assess the percentage of the audience reached and adjust strategies as needed for maximum outreach.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	<p>Apr – Review and revamp the existing online reporting form to improve user experience; Establish a tracking system to measure audience reach and effectiveness of the reporting method</p> <p>Sep – Announce and promote the reporting method through various media channels</p> <p>Dec - Announce and promote the reporting method through various media channels again</p>
Years 2 – 5	<p>Sep – Maintain and promote the reporting method, using data from the tracking system to optimize outreach strategies</p> <p>Dec - Maintain and promote the reporting method, using data from the tracking system to optimize outreach strategies</p> <p>Continually make any necessary updates to the reporting form to enhance its functionality; Ensure the reporting mechanism stays clearly publicized on the website</p>

4. **Illicit Discharge Response**

Measurable Goals:

- Develop and maintain clear, effective procedures for responding to illicit discharges, illegal dumping, and spills.
- Review and update these procedures annually to reflect any regulatory changes or identified improvements to response strategies.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Develop initial response procedures covering illicit discharges, illegal dumping, and spills; Distribute these procedures to relevant staff and ensure proper documentation for accessibility
Years 2 – 5	Jun – Review and update response procedures annually, incorporating feedback and any regulatory updates to improve effectiveness; Ensure all relevant staff are informed of any changes, and keep records of each review for compliance tracking

5. Illicit Discharge Investigation

Measurable Goals:

- Investigate 100% of known illicit discharges and illegal dumping incidents within MS4 jurisdiction each year.
- Respond within 24 hours to 100% of high-priority discharges, including sanitary sewer discharges, or notify the appropriate agency if jurisdictional limits apply.
- For incidents outside MS4 jurisdiction, notify the relevant MS4 operator or the TCEQ regional office for 100% of cases annually.
- Report 100% of illicit flows immediately to TCEQ when they pose an immediate threat to human health or the environment.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	<p>Jun – Develop and refine procedures for investigation and response to illicit discharges, with a focus on high-priority discharges</p> <p>Sep – Train staff on response protocols, including documentation and notification procedures for incidents beyond jurisdiction;</p> <p>Dec – Establish a tracking and reporting system to ensure timely response and accurate notification</p>
Years 2 – 5	<p>Conduct investigations for all reported illicit discharges or illegal dumping incidents, following the established procedures as needed; Ensure timely responses to all high-priority discharges and maintain ongoing communication with TCEQ and adjacent MS4 operators as required</p> <p>Dec – Review and update response protocols annually based on incident data and any regulatory updates</p> <p>Dec – Refine tracking and reporting processes each year to improve the accuracy and effectiveness of source investigations and notifications</p>

6. Illicit Discharge Elimination

Measurable Goals:

- For 100% of identified illicit discharges or illegal dumping incidents with a determined source, notify the responsible party within 24 hours.
- Ensure that the responsible party completes all corrective actions necessary to eliminate the illicit discharge or illegal dumping.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Establish notification procedures to ensure responsible parties are informed within 24 hours of identifying the source of any illicit discharge or illegal dumping incident
Years 2 – 5	Continue the process of notifying responsible parties for required corrective actions, making small updates to the process as needed to ensure timely responses and effective actions as necessary

7. Illicit Discharge Inspection Procedures

Measurable Goals:

- Maintain clear written procedures for conducting inspections in response to complaints and verifying corrective actions.
- Review and update inspection procedures at least once annually to reflect changes and improvements.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jun – Develop and implement written procedures for inspection protocols, ensuring they detail criteria for initiating inspections and conducting follow-ups.
Years 2 – 5	Dec – Annually review and revise inspection procedures to incorporate necessary changes and improvements based on feedback and regulatory updates.

8. Responding to Complaints

Measurable Goals:

- Respond to 100% of complaints each year by conducting inspections according to established procedures.
- Conduct follow-up inspections for 100% of cases where necessary, as outlined in the inspection procedures.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Establish and implement a system for tracking and responding to complaints, ensuring that inspections are conducted as required by the established procedures
Years 2 – 5	Continue to conduct inspections in response to 100% of complaints each year and perform follow-up inspections where necessary, making adjustments to the procedures as needed based on feedback and effectiveness

IV. MCM 4 – Construction Site Stormwater Runoff Control

The Construction Site Stormwater Runoff Control minimum control measure focuses on minimizing pollutant discharges from construction activities that disturb one acre or more (or smaller sites part of a larger plan). This includes implementing and maintaining erosion and sediment controls, as well as prohibiting discharges such as concrete washout, fuels, and other construction-related pollutants. The program requires the development of a regulatory mechanism to enforce these controls, along with plan review procedures to ensure construction sites have appropriate stormwater management measures in place. Regular inspections are conducted based on site-specific factors such as erosion potential and proximity to water bodies, with follow-up enforcement actions as needed. Public input is incorporated through established reporting mechanisms, and staff receive regular training to ensure the program is effectively implemented. Success will be measured through specific, trackable goals for each Best Management Practice (BMP) included in this control measure, ensuring continuous compliance and protection of water quality.

Best Management Practices:

1. Regulatory Mechanisms

Measurable Goals:

- Review the district regulatory requirements to ensure an ordinance or regulatory mechanism that requires operators of construction activities to implement and maintain effective stormwater control measures.
- Ensure the ordinance includes provisions for erosion and sediment control, as well as sanctions for non-compliance, to the extent allowable under state, federal, and local law.
- Review and update the ordinance or regulatory mechanism at least once during the permit term to ensure its effectiveness and relevance.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jun – Review the district regulatory requirements to ensure an ordinance or regulatory mechanism exists, that includes all necessary requirements for stormwater control measures, erosion and sediment control, and compliance sanctions Conduct board member reviews and make necessary revisions based on feedback
Year 2	As appropriate, finalize and adopt the ordinance or regulatory mechanism, ensuring all relevant parties are informed about the new requirements and compliance measures
Years 3 – 5	Review the ordinance or regulatory mechanism at least once during the remaining permit term to identify areas for improvement and/or necessary updates based on changes in regulations, feedback from board members, or observed effectiveness; Implement any updates as needed to enhance compliance and enforcement

2. Prohibited Discharges

Measurable Goals:

- Review the district regulatory requirements to ensure an ordinance or regulatory mechanism exists, that explicitly prohibits the following discharges:
 - A. Wastewater from washout of concrete and wastewater from water well drilling operations, unless managed by appropriate controls.
 - B. Wastewater from washout and cleanout of stucco, paint, release oils, and other construction materials.
 - C. Fuels, oils, or other pollutants used in vehicle and equipment operation and maintenance.
 - D. Soaps or solvents used in vehicle and equipment washing.
 - E. Discharges from dewatering activities, including discharges from dewatering of trenches and excavations, unless managed by appropriate BMPs
- Ensure that the ordinance includes sanctions for non-compliance to enforce the prohibitions effectively.
- Review and update the ordinance or regulatory mechanism at least once during the permit term to maintain its relevance and effectiveness.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	<p>Jun – Review the district regulatory requirements to ensure an ordinance or regulatory mechanism exists that outlines the prohibited discharges, and includes appropriate compliance measures</p> <p>Conduct board member reviews and incorporate feedback to finalize the document</p>
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Year 2	As appropriate, finalize and adopt the ordinance or regulatory mechanism, ensuring all relevant parties are informed about the new requirements and compliance measures
Years 3 – 5	Review the ordinance or regulatory mechanism at least once during the remaining permit term to identify areas for improvement and/or necessary updates based on changes in regulations, feedback from board members, or observed effectiveness; Implement any updates as needed to enhance compliance and enforcement

3. Site Plan Review

Measurable Goals:

- Ensure that all new construction site plans are reviewed according to established site plan review procedures before construction begins, with attention to water quality impacts.
- Incorporate water quality considerations into 100% of reviewed plans and confirm that they meet the TPDES Construction General Permit (CGP) requirements, including necessary construction site control measures.
- Review and update site plan review procedures annually to incorporate regulatory updates, feedback from board members, and any procedural improvements to enhance effectiveness.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	<p>Sep – Conduct an annual review of the site plan review procedures, making updates as needed based on regulatory changes, board member feedback, or observed effectiveness</p> <p>Continue to apply the procedures to 100% of new construction site plans, verifying that all plans include required control measures before allowing construction to commence</p>
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4. Construction Project Inspection Procedures

Measurable Goals:

- Develop and maintain written procedures for inspecting construction projects, outlining inspection criteria, timing, and steps for ensuring compliance.
- Review and update inspection procedures at least once annually to reflect any regulatory updates or process improvements.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Establish initial inspection procedures based on water quality risk factors (such as soil erosion potential, site slope, and proximity to water bodies) and ensure procedures are documented and accessible
Years 2 – 5	Dec – Conduct an annual review of the inspection procedures and update them as needed to stay aligned with TCEQ guidance or adjust based on site feedback

5. Construction Site Inspections

Measurable Goals:

- Conduct inspections at a minimum of 80% of active construction sites each year according to the established procedures.
- Perform follow-up inspections in 100% of cases where compliance issues are identified to ensure corrective actions have been implemented effectively.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Begin conducting inspections for at least 80% of active sites, prioritizing those with higher risk to water quality; perform necessary follow-ups and document findings as required
Years 2 – 5	Continue inspecting at least 80% of active construction sites annually, with follow-up inspections as needed; refine inspection focus or frequency based on prior year results and regulatory feedback

6. Public Concerns

Measurable Goals:

- Set up a public submission feature on the MS4 webpage to collect and consider public input specifically about construction activities and stormwater concerns.
- Maintain and update the public submission process to ensure public concerns are received, tracked, and reviewed effectively.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Add a submission form or feedback area on the existing MS4 webpage to specifically address construction activity and stormwater concerns Jun – Review and test the submission feature for functionality and ease of use; Establish simple tracking and follow-up procedures for handling submitted information, confirming all concerns are appropriately reviewed and addressed
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Years 2 – 5	Sep – Maintain and refine the submission process, with annual reviews to address any changes in procedures or feedback from public users; Make updates as necessary to improve user experience and streamline the review process as appropriate
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7. Staff Training

Measurable Goals:

- Ensure 100% of MS4 staff whose primary job duties are related to implementing the construction stormwater program receive training annually, including staff involved in permitting, plan review, site inspections, and enforcement.
- Review and update training materials annually to reflect any changes in regulations, procedures, or best practices.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	<p>Jun – Organize and conduct the first training session for all relevant MS4 staff, ensuring it covers the full range of construction stormwater program activities</p> <p>Sep – Evaluate the training process to ensure it meets the needs of the staff and regulatory requirements, collecting feedback for future improvements</p>
Years 2 – 5	<p>Jun – Conduct an annual training session for 100% of relevant MS4 staff, either in-person or through self-paced training materials</p> <p>Sep – Review and update training materials each year to incorporate new regulations, feedback from staff, and any changes in stormwater program procedures; Ensure training is tracked for documentation and reporting to TCEQ</p>

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

The Post-Construction Stormwater Management minimum control measure focuses on reducing pollutants in stormwater runoff from new development and redevelopment projects. This includes sites that disturb one acre or more, as well as smaller sites that are part of a larger development plan. The control measure requires the implementation of structural and non-structural Best Management Practices (BMPs) designed to prevent long-term water quality impacts. BMPs may include physical stormwater controls as well as operational practices such as maintenance and inspections. The program also involves ensuring that post-construction stormwater controls are installed and maintained over the long term, either by the municipality or by private site owners under a documented maintenance plan. Enforcement mechanisms ensure compliance with these requirements, and records of maintenance activities and enforcement actions are maintained for review. Success will be determined through the achievement of measurable goals for each BMP, ensuring effective and sustainable stormwater management for new and redeveloped sites.

Best Management Practices:

1. Regulatory Mechanisms

Measurable Goals:

- Review the district regulatory requirements to ensure an ordinance or regulatory mechanism exists to address post-construction runoff from new development and redevelopment projects, ensuring owners or operators design, install, implement, and maintain appropriate BMPs.
- Review and update the ordinance or mechanism at least once per permit term to address changes or improvements.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jun – Review the district regulatory requirements to ensure an ordinance or regulatory mechanism exists, that outlines requirements for post-construction BMPs Conduct board member reviews and incorporate feedback to finalize the document
Year 2	As appropriate, finalize and adopt the ordinance or regulatory mechanism, ensuring all relevant parties are informed about the new requirements and compliance measures
Years 3 – 5	Review the ordinance or regulatory mechanism at least once during the remaining permit term to identify areas for improvement and/or necessary updates based on changes in regulations, feedback from board members, or observed effectiveness; Implement any updates as needed to enhance compliance and enforcement

2. Record Keeping

Measurable Goals:

- Document and retain records of all enforcement actions related to post-construction runoff.
- Ensure availability of records for TCEQ review within 24 hours of request.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jul – Develop and implement a standardized record-keeping system to document all enforcement actions related to post-construction runoff Oct – Train relevant staff in using the system and establish access protocols to ensure records can be promptly provided to TCEQ when requested
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Years 2 – 5	<p>Maintain records for 100% of enforcement actions taken each year, ensuring they are complete, up-to-date, and accessible</p> <p>Nov – Annually review the record keeping system to make any necessary updates or improvements, ensuring compliance with TCEQ standards and maintaining the ability to fulfill TCEQ requests within 24 hours</p>
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3. Ensuring Long Term Maintenance

Measurable Goals:

- Ensure that maintenance plans are implemented for 100% of structural stormwater control measures maintained by the district each year.
- Require 100% of new development or redevelopment site owners or operators to develop and implement maintenance plans for any structural controls installed on-site.
- Ensure that site owners or operators maintain documentation of 100% of maintenance performed, and make this documentation available for review by the district or TCEQ within 24 hours of request.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	<p>Ensure a maintenance plan is in place for all structural stormwater control measures maintained by the district; Verify that maintenance plans are developed by owners/operators for new development or redevelopment sites; Confirm that site owners/operators are tracking maintenance activities</p>
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Years 2 – 5	Continue to monitor and verify that maintenance plans for 100% of structural stormwater control measures are being implemented; Ensure site owners/operators maintain documentation of maintenance performed and that it is available for review within 24 hours of request
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VI. MCM 6 – Pollution Prevention and Good Housekeeping for Municipal Operators

The Pollution Prevention and Good Housekeeping minimum control measure is aimed at minimizing pollutant runoff from municipal operations. This is achieved through the development of an operation and maintenance (O&M) program, which includes employee training and ensures proper management of municipally owned areas such as parks, streets, vehicle yards, and stormwater systems. Key components include maintaining an inventory of municipal facilities, managing waste disposal, and ensuring contractors comply with stormwater management protocols. Additionally, the program evaluates municipal activities for potential pollutant discharge, implements pollution prevention measures, and ensures long-term maintenance of structural stormwater controls. Success will be measured through established, trackable goals for each Best Management Practice (BMP), ensuring continuous improvement and compliance with environmental regulations.

Best Management Practices:

1. Facility Inventory

Measurable Goals:

- Develop and maintain an annual inventory for 100% of the permittee-owned and operated facilities and stormwater controls within the regulated MS4 area.
- Ensure the inventory includes all applicable permit numbers, registration numbers, and authorizations for each facility or control, covering the full range of facilities listed in Part IV.D.6.(b)(1) of the TPDES General Permit.
- Review and update the inventory at least annually to reflect any changes, additions, or deletions of facilities and controls as applicable.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Sep – Create and maintain an inventory for 100% of permittee owned and operated facilities and stormwater controls; Include all required details, such as permit numbers, registration numbers, and authorizations
Years 2 – 5	Continue updating the inventory annually to capture any changes or additions to the facilities and controls list; Ensure the inventory remains complete and available for review by TCEQ.

2. Employee Training

Measurable Goals:

- Conduct at least one training session annually for 100% of employees responsible for implementing pollution prevention and good housekeeping practices.
- Ensure training materials (in-person, videos, or reading materials) are available and accessible to all applicable employees.
- Maintain a training attendance list for all sessions to be available for TCEQ review upon request.
- If using contractors, verify that 100% of applicable contract staff are trained annually through contract language or a similar method.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Mar – Identify and develop training materials for pollution prevention and good housekeeping practices Sep – Conduct a training session for all applicable employees and ensure training is provided to 100% of contractors if applicable; Maintain an attendance list for all training sessions
Years 2 – 5	Jun – Annually review and update training materials if necessary Sep – Conduct at least one training session for all applicable employees and contractors each year; Ensure attendance lists are updated and kept available for review

3. Proper Waste Disposal

Measurable Goals:

- Ensure 100% of waste materials removed from the small MS4 are disposed of in compliance with 30 TAC Chapters 330 or 335 annually.

This goal will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	Confirm and ensure appropriate disposal methods are followed for all MS4-related waste each year throughout the permit term.
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4. Contractor Requirements

Measurable Goals:

- Ensure that 100% of contractors hired by the district to perform maintenance activities on permittee-owned facilities are contractually required to comply with all applicable stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures.
- Implement oversight procedures for 100% of contractor activities annually to confirm the use of appropriate control measures and SOPs.
- Maintain oversight procedures on-site at all times and ensure they are available for review by TCEQ within 24 hours of request.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	Include stormwater compliance requirements in 100% of relevant contracts at the time of contract execution or renewal; Conduct oversight of contractor activities throughout the year to verify compliance with contract terms and applicable SOPs; Maintain oversight procedures on-site and ensure they are readily available for TCEQ inspection annually.
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5. Operation & Maintenance Activities

Measurable Goals:

- Annually evaluate 100% of O&M activities for their potential to discharge pollutants in stormwater. This includes, but is not limited to:
 - A. Road and parking lot maintenance (e.g., pothole repair, pavement marking, sealing, re-paving)
 - B. Bridge maintenance (e.g., re-chipping, grinding, saw cutting)

- C. Cold weather operations (e.g., plowing, sanding, application of deicing and anti-icing compounds, snow disposal area maintenance)
- D. Right-of-way maintenance (e.g., mowing, herbicide and pesticide application, planting vegetation)
- Review procedures associated with each O&M activity, and identify potential improvements to reduce pollutant discharge where applicable.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Years 1 – 5	Dec – Annually evaluate 100% of the O&M activities for potential to discharge pollutants in stormwater, focusing on all listed activities: Review and update any procedures as necessary to ensure compliance with pollution prevention standards
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6. Identify Pollutants from Operation & Maintenance

Measurable Goals:

- Create a list of pollutants of concern that could be discharged from all O&M activities, including metals, chlorides, hydrocarbons (e.g., benzene, toluene, ethyl benzene, xylenes), sediment, and trash.
- Maintain a comprehensive list of identified pollutants related to all O&M activities.
- Review and update the pollutants list annually to account for any new O&M activities or changes.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jul – Develop and create a list of pollutants of concern related to all O&M activities (e.g., road maintenance, bridge work, cold weather operations, and right-of-way maintenance) Nov – Complete a review of the O&M activities and identify pollutants
Years 2 – 5	Dec – Annually review and update the list of pollutants to reflect any changes in O&M activities or new pollutants identified

7. Pollution Prevention

Measurable Goals:

- Develop and implement pollution prevention measures to reduce stormwater pollutants from permittee-owned operations.
- Implement at least two of the following measures within the permit term:
 - A. Replace at least 50% of the MS4's materials and chemicals with more environmentally friendly alternatives by the end of the permit term.
 - B. Track 100% of deicing and anti-icing compound applications in the MS4 area and record the amount used annually.
 - C. Use suspended tarps, booms, or vacuums to capture pollutants such as paint, solvents, rust, and paint chips during 80% of regular bridge maintenance each year.
 - D. Place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Identify and implement two pollution prevention measures from the options listed above; Document implementation and evaluate effectiveness
Years 2 – 5	Annually evaluate and adjust pollution prevention measures as needed to ensure compliance with the requirement to implement at least two measures each year; Ensure measures align with current operations and district goals, selecting from the list of four measures as applicable

8. Inspection of Pollution Prevention Measures

Measurable Goals:

- Ensure proper functioning of pollution prevention measures at permittee-owned facilities through annual visual inspections.
- Develop and maintain written procedures for inspections, including frequency and methodology.
- Review and update the inspection procedures at least one time annually to address changes or additions to the pollution prevention measures
- Maintain a log of inspections for TCEQ review upon request.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jun – Develop written procedures for visual inspections of pollution prevention measures, including the frequency of inspections and methods for conducting inspections Conduct visual inspections of 100% of pollution prevention measures at permittee-owned facilities, keeping a log of inspections when performed
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Years 2 – 5	Conduct visual inspections of 100% of pollution prevention measures annually; Update written inspection procedures as necessary to account for new measures or operational changes; Maintain and review the inspection log to ensure completeness and compliance with TCEQ requirements; Make logs and updated procedures available for TCEQ review upon request
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9. Structural Control Maintenance

Measurable Goals:

- Perform annual maintenance on 100% of structural controls to maintain their effectiveness.
- Develop and maintain written procedures that define the frequency and methodology of inspections and maintenance.
- Review and update written procedures annually to reflect any changes or additions.

These goals will be measured for effectiveness by evaluating if all aspects of the identified actions are fully completed within the specified time frame, ensuring that required activities are performed and documented as necessary.

Implementation Timeline:

Year 1	Jun – Develop written procedures for structural control maintenance specifying inspection frequency and detailing methods for both inspections and maintenance Dec – Conduct initial inspections of 100% of structural controls to establish baseline conditions; Perform maintenance as needed based on initial inspections to ensure effectiveness
Years 2 – 5	Dec – Conduct annual inspections and maintenance for 100% of structural controls; Review and update written procedures annually to account for operational changes, new structural controls, or updated BMPs; Document all inspections and maintenance activities and retain records for TCEQ review upon request