March 25, 2025

Texas Commission on Environmental Quality
Stormwater Team Leader (MC-148)
P.O. Box 13087
Austin, TX 78711-3087

Re: Phase II MS4 Annual Report Transmittal for City of Sugar Land TPDES Authorization: TXR040111

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040111 for the City of Sugar Land.

The annual report is for Year 6. The reporting period's beginning January 1, 2024 and ending December 31, 2024.

A separate Notice of Change has not been submitted based on the fact that the City submitted a revised SWMP to apply for coverage under the renewed MS4 General Permit TXR040000.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 12 in Houston, Texas.

Sincerely,

Christian Eubanks
Environmental Manager

CITY OF SUGAR LAND
STORMWATER MANAGEMENT PROGRAM ANNUAL REPORT

Permit Year 6
January 1, 2024 – December 31, 2024

PREPARED BY:

CITY OF SUGAR LAND
111 Gillingham Lane
Sugar Land, Texas 77478

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040111

Reporting Year (year will be either 1, 2, 3, 4, or 5): 6

Annual Reporting Year Option Selected by MS4:

Calendar Year: X

Permit Year_____

Fiscal Year: _____ Last day of fiscal year: (_____)

Reporting period beginning date: (month/date/year) 01/01/2024

Reporting period end date (month/date/year) 12/31/2024

MS4 Operator Level: Level 4 Name of MS4: City of Sugar Land

Contact Name: Christian Eubanks Telephone Number: 281.275.2284

Mailing Address: 111 Gillingham Lane Sugar Land, TX 77479

E-mail Address: ceubanks@sugarlandtx.gov

A copy of the annual report was submitted to the TCEQ Region YES X NO___
Region the annual report was submitted. TCEQ Region: 12

B. Status of Compliance with the MS4 GP and SWMP

Provide information on the status of complying with permit conditions:

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		The City was able to meet all measurable goals for Reporting Year Jan. 2024 – Dec. 2024.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		The City met recordkeeping and reporting requirements during Jan. 2024 – Dec. 2024.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	X		The City met goals for Reporting Year Jan. 2024 – Dec. 2024.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report.	X		The City reviewed the SWMP submitted to TCEQ for renewal of MS4 permit.

2. Provide a general assessment of the appropriateness of the selected BMPs. Use table below or attach a summary, as appropriate:

   See attached, Appendix A.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction of pollutants, provide an explanation. Use the table below to meet this requirement:

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
1	Public Education	Storm Drain Marking Program	0	Number of storm drains marked.	No. This BMP does not result in a direct reduction of pollutants; however, it deters people from disposing of material in the storm drains.
1	Public Education	Don't Mess with Texas Trash-Off	1,440	Pounds of garbage collected.	No, volunteers would normally collect garbage from various locations, reducing the amount of material entering our waterways.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
1	Public Education	Adopt-A-Spot Program	3,260	Pounds of garbage collected.	Yes. Volunteers collect garbage from various locations, reducing the amount of material entering our waterways.
1	Public Education	Social Media Outreach	7 social media posts 248 webpage views	Social media posts.	No. This BMP does not result in a direct reduction of pollutants; however, it helps educate people on the importance of stormwater quality.
1	Public Education	311 Contact Center	9	Citizen reports of stormwater quality concerns.	Yes. When the City receives reports of possible stormwater quality issues, staff can take immediate action to identify the source, remove the pollutant, and educate the responsible party.
2	Detection and Elimination	Household Hazardous Waste (HHW) Collections	32,207	Pounds of material collected.	Yes. Providing a disposal method for HHW prevents material from being illegally dumped in the MS4.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
2	Detection and Elimination	Illicit Discharges and Spills	9	Number of illicit discharges reported.	Yes. When the City receives reports of a possible illicit discharge, staff can take immediate action to identify the source, remove the pollutant, and educate the responsible party.
2	Detection and Elimination	Grease Trap Inspections	570	Number of grease trap inspections conducted.	Yes. Inspecting grease traps routinely helps reduce the number of SSO's.
3	Construction Site Inspection	Construction sites	193	Inspections.	Yes. By inspecting the construction sites, we can evaluate if proper BMPs are in place to reduce sediment discharge and erosion.
4	Post-Construction Plan Review	Post-Construction Plans	5	Post-construction maintenance plans.	No. The reduction in pollutants will be reduced over time as the permanent post construction BMPs are utilized.

MCM	BMP	Information Used	Quantity	Units	Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
5	Facility Inspection Program	Standard Operation Procedures	34	Inspections.	Yes. By inspecting the facilities, the City can evaluate if proper BMPs are in place to reduce pollutants from entering the MS4.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals:

   See attached, Appendix B.

C. Stormwater Data Summary

Provide a summary of all information used including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

The City performed dry weather screening at 120 City-known outfalls during PY3 and 130 City outfalls during PY5. The City also conducted bacteria and D.O. sampling events at 4 sites in Upper Oyster. Additionally in PY 5, two 24-hour D.O. sampling events were conducted at 2 sites in Upper Oyster Creek. City staff investigated all 9 illicit discharge complaints received via the 311 Contact Center.

City staff also conducted 12 pre-construction meetings with contractors, 17 pre-development meetings with contractors, and inspected 23 active construction sites during PY6. The City and contract crews operated, maintained, and repaired wastewater collection lines and manholes, and conducted grease trap inspections to ensure proper operation and maintenance. The City contractor also collected approximately 1,800 cubic yards of debris during routine street sweeping throughout PY 6.

D. Impaired Waterbodies

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.

   According to 2022 Texas Integrated Report of Surface Water Quality, there are no newly-identified impaired waters in the MS4's jurisdiction.

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern:

   The City performed dry weather screening at 130 City-known outfalls during PY 5. The City also conducted bacteria and D.O. sampling events at 4 sites in Upper Oyster. Additionally in PY 5, two 24-hour D.O. sampling events were conducted at 2 sites in Upper Oyster Creek. The City continues to remove feral hogs throughout the year. The City's Parks Department also provides and collects pet waste bags throughout our community parks.

3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL:

Activity	**Pollutant of Concern**	**Measurable Goal**	**Evaluation**
Monitoring 1.1: Support BIG Regional BMP Database Effort	Bacteria	Attend one Upper Oyster Creek TMDL I-Plan meeting by December of each year (2019-2024).	The City will continue to provide information regarding BMP implementation, monitoring or sampling data at the annual I-Plan meeting.
Monitoring 1.2: Review DMR/SSO Data over Next 5 Years	Bacteria	Submit DMR and SSO reports to TCEQ in accordance with TXR050000 requirements from January 1 to December 31 of each year (2019-2024).	The City will continue to provide DMR and SSO data for WWTPs in the watershed for the next five years.

Monitoring 1.5: Conduct Additional Monitoring	Bacteria and DO	Conduct one DO and bacteria sampling event in Permit Year 2 (by December 2020) and in Permit Year 4 (by December 2022).	The City conducted 2 DO and bacteria sampling events during PY 5. Due to program changes, the City was unable to complete the bacteria and dissolved oxygen monitoring in PY4 as outlined in the SWMP.
Research 2.3: Evaluate Future Sampling Data	Bacteria and DO	Provide DO and bacteria sampling results to H-GAC in Permit Year 3 (by December 2021) and in Permit Year 5 (by December 2023).	The City provided available bacteria and DO sampling data to H-GAC for the Basin Summary Report in PY5.
Education and Outreach 3.1: Deliver the Lone Star Healthy Stream Program Feral Hog Component	Bacteria and DO	Assess 100% of complaints received regarding feral hog activity within our jurisdiction from January 1 to December 31 of each year (2019-2024).	The City has an ongoing process for the removal of feral hogs. A total of 12 documented feral hogs were removed during PY 6.

Education and Outreach 3.2: Urban/Suburban Education and Outreach	Bacteria and DO	Sponsor at least one community environmental education class and one student education presentation regarding water quality aspects such as stormwater, recycling, and conservation by December of each year (2019-2024).	The City, in collaboration with Keep Sugar land Beautiful (KSLB) and private residents, continue to host and participate in multiple events throughout the year which included the following: Going Green Together Speakers Bureau, Reuse and Reuse Recycling education table at giving spirits concert, TX Ambassadors Youth Summit, Keep Texas Beautiful (KTB) Regional Training hosted by KSLB, KSLB Youth Advisory Board, and the Adopt-a-Spot program. During PY 6, 248 events were held, with 433 volunteers.
Education and Outreach 3.4: Stream Team Volunteering Sampling	DO	Utilize at least one volunteer to perform water quality monitoring activities at all active monitoring locations on a monthly basis from January to December of each year (2019-2024).	The City continues to participate in the Texas Stream Team Program. During PY 5 City staff, in partnership with Houston-Galveston Area Council (H-GAC), conducted a Stream Team training on November 4, 2023. 5 volunteers were trained and assigned monitoring sites. This group of volunteers began monitoring in December of 2023. Information about the program and/or registration is available on the City's stormwater webpage. https://www.sugarlandtx.gov/335/Public-Involvement
General Nonpoint Source Management 5.4: Dog Parks and Dog Waste Stations	Bacteria	Maintain installation of dog waste bags at 50% of the City's 24 dog waste stations by December of each year (2019-2024).	Pet waste stations are located throughout community parks within the City. During the PY 6, a total of 130,000 dog waste bags were collected from the 25 pet waste stations.

General Nonpoint Source Management 5.7: Domestic Oil Recycling Program	DO	Collect 300 gallons of domestic cooking oil through the City's collection program by December of each year (2019-2024).	The City's Public Works facility offers a drop-off center for residents to utilize during working hours. The center accepts passenger tires and cooking oil. City residents may dispose of up to 10 gallons of liquid cooking oil per day at no charge. The cooking oil recycling center is for residential customers only and includes only liquid cooking grade fats, oils and grease, and not petroleum products. During PY 6, the City collected 416 gallons of liquid cooking oil at the drop-off center.
General Nonpoint Source Management 5.8: Household Hazardous Waste (HHW) Collection Event	DO	Collect 10,000 pounds of household hazardous and electronic waste through the City's collection programs by December of each year (2019-2024).	On March 2014, the City enhanced its Solid Waste and Recycling Program by adding curbside collection of Household Hazardous Waste (HHW) and Electronic Waste. In 2021, the City reduced its Solid Waste and Recycling Program by removing curbside collection of HHW and Electronic Waste. The City encourages residents to utilize the Fort Bend County Recycling Center for Hazardous Waste drop off. In PY5 the City was awarded a Solid Waste Grant from H-GAC to host a HHW/Electronic Waste collection event in FY24/25. This event will be widespread and will give residents an opportunity to dispose of HHW/E-Waste in the correct and environmentally responsible manner. The event was held on October 19, 2024 and 32,207 lbs of HHW was collected.
Urban MS4 Stormwater Management 6.1: MS4 Phase II Activities	Bacteria and DO	Apply for permit coverage under the renewed TXR040000 MS4 General Permit by July 2019.	The City has applied for permit coverage and in August 2023 a response from TCEQ was received acknowledging approval.

Urban MS4 Stormwater Management 6.2: Ordinance for Pet Waste and Waste Haulers	Bacteria and DO	Evaluate the existing City stormwater ordinance for potential updates and adopt any necessary modifications by December 2020.	The City completed the evaluation of Ordinance No. 1972, which requires all liquid waste haulers to obtain a license from the City in order to collect, transport, and/or dispose of liquid waste. No revisions were identified for City Council approval. During PY 6, the City licensed 27 commercial liquid waste haulers.
Sanitary Sewer Collection Systems 11.3: Fats, Oils, and Grease Requirements	Bacteria	Perform one inspection at 100% of grease traps within MS4 jurisdiction by December of each year (2019-2024).	The City conducted 570 grease trap inspections in PY 6.

4. Report the benchmark identified by the MS4 and assessment activities:

Benchmark Parameter	**Benchmark Value**	**Description of additional sampling or other assessment activities**	**Year(s) conducted**
Bacteria	4,570 Billion cfu/d	The City conducted two bacteria sampling events at 4 sites in Upper Oyster Creek on 6/13/2023 and 8/18/2023.	PY 5
Dissolved Oxygen (DO)	4.0 mg/L 24-Hour Average DO concentrations	The City conducted two 24-hour D.O. sampling events at 4 sites in Upper Oyster Creek on 6/13/2023 and 8/18/2023.	PY 5

5. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark:

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
Bacteria	• Stormwater Quality Education Materials • Community Events • Texas Stream Team Water Quality Monitoring Program • Social Media Outreach • Detection and Elimination Program • MS4 Staff Training	The City educates the general public via the City website, social media posts, and community outreach events year round. Educational Material is provided at all outreach events. Texas Stream Team volunteers were trained and began sampling events in PY5. The City continues to investigate all illicit discharge complaints received, and provides annual training to City staff on illicit discharges, construction inspections, and good housekeeping.
Dissolved Oxygen (DO)		

6. If applicable, report on focused BMPs to address impairment for bacteria:

Description of Bacteria Focused BMP	**Comments/Discussion**
• Make Improvements to Reduce Overflows • Address Lift Station Inadequacies • Improve Reporting of Overflows • Maintain Requirements to Reduce Blockages from Fats, Oils, and Grease (FOGs)	The City's Water Utilities Division operates, maintains, and repairs sanitary sewer collection lines and manholes in a manner that meets all state and federal guidelines. City staff and contract operation firms are also responsible for the operation, maintenance, and repair of 132 sanitary sewer lift stations and four wastewater treatment plants. During PY 6, 570 grease trap routine inspections were performed by the City. Staff maintains a database detailing the dates of the inspection and inspection rating. During PY 6, the City licensed 27 commercial liquid waste haulers.
• Identify and Address Failing Systems • Address Inadequate Maintenance of OSSFs	The City will reevaluate the sanitary sewer system to determine if any septic systems are currently in operation within the City. There is a pump and haul system in operation at the facility housing the City's Visitor Center and Fort Bend Children's Discovery Center. Any inadequacies or failures will be addressed through the City's MCM 2 Illicit Discharge Detection and Elimination Program.
• Continue Effort to Reduce Waste Sources of Bacteria	During PY 6, the City responded to a total of 9 illicit discharge service requests.

• Continue Management Programs to Identify and Target Animal Sources	The City removed a total 12 documented feral hogs during PY 6.
• Bacteria Discharging from a Residential Site During Runoff Events or Directly • Fats, Oils, and Grease (FOG) Clogging Sanitary Sewer Lines & Resulting Overflows • Decorative Ponds • Pet Waste	The City distributed educational materials under its Public Education, Outreach and Involvement program that focuses on the impacts of bacteria on receiving streams. The City also distributed restaurant brochures focusing on FOG issues. The City continues to develop new material for use at future outreach events. The City currently provides pet waste stations in City parks and distributes pet waste bag key-chains for residents to use while walking their dogs. During PY 6, the City collected 130,000 dog waste bags at local parks. The City's website and social media platforms are also used to reach out to the public regarding proper pet waste handling.

7. Assess the progress to determine BMP's effectiveness in achieving the benchmark:

Benchmark Indicator	Description/Comments
Number of Illegal Dumping Reported	There were 9 complaints of illegal dumping for PY 6.
Reduction in Animal Sources	The City removed 12 documented feral hogs throughout the City. Personal pet waste bags were distributed at community events, and the City's Parks Department collected 130,000 dog waste bags at City parks.
Reductions in Sanitary Sewer Overflows (SSOs)	The City passed a Liquid Waste Ordinance in October 2014 that requires all liquid waste operators to obtain a license to collect, transport, and/or dispose of liquid waste within the City.
Number of Educational Opportunities Conducted	The City, in partnership with KSLB, conducted a series of community events, school activities, and presentations addressing non-point source pollution, water conservation, and recycling. During PY 6, a total of 15 events were conducted reaching approximately 1,101 people. These events included Going Green Together Speakers Bureau, Earth Day Celebration, and Texas Recycles Day.

E. Stormwater Activities

Describe activities planned for the next reporting year:

MCM(s)	BMP	Stormwater Activity	Description/Comments
Impaired Water Bodies	Conduct Additional Monitoring	Monitor for 24-hour DO levels and bacteria in key areas of the watershed.	The City conducted two 24-hour DO and bacteria sampling in key areas of the watershed during PY 5.
MCM 5- Good Housekeeping and Pollution Prevention	Municipal Operations and Maintenance Activities	Develop procedures to implement stormwater BMPs as deemed necessary in the municipal operations assessment.	Document procedure development for implementing stormwater BMPs.
MCM 5- Good Housekeeping and Pollution Prevention	Municipal Operations and Maintenance Activities	Develop written procedures describing the frequency and steps for performing visual inspections by December 2022	Procedure for performing visual inspections at municipal facilities was discussed and reviewed during PY4. A written procedure was developed for this in PY5.

MCM 5- Good Housekeeping and Pollution Prevention	Evaluation of Flood Control Projects	Inventory all City-owned flood control structures and evaluate their potential to minimize impacts to receiving waters.	The inventory and evaluation of all City-owned flood control structures was assessed in PY 5.
MCM 5- Good Housekeeping and Pollution Prevention	Evaluation of Flood Control Projects	Develop design, construction, and maintenance criteria for future City-owned flood control structure projects.	The City will investigate the need for future City-owned flood control structures and develop a procedure to move forward with implementation.
MCM 5- Good Housekeeping and Pollution Prevention	Contractor Requirements and Oversight	Develop standard operating procedures to oversee contractor operations.	The City evaluated the contract language for contractors that perform work on City-owned facilities and will develop standard operating procedures to oversee contractor operations.

MCM 6- Industrial Stormwater Sources	Industrial Stormwater Sources Inspection Program	Conduct one inspection at 100% of private facilities that require compliance with the MSGP that lie within the City's regulated MS4 area.	An industrial inspection training program was developed in PY4. Industrial stormwater inspections began in PY5. 100% of private facilities who held an MSGP within the MS4 were investigated in PY6.
MCM 6- Industrial Stormwater Sources	Industrial Stormwater Sources Inspection Program	Conduct one inspection at 100% of City-owned and operated facilities that require compliance with the MSGP.	An industrial inspection training program was developed in PY4. Industrial stormwater inspections at City-owned and operated facilities began in PY5. 100% of City-owned facilities who held an MSGP within the MS4 were investigated in PY6.

F. SWMP Modifications

1. The SWMP and MCM implementation procedures are reviewed each year.

   _X_ Yes___No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ's review.

____Yes__X__No

If 'Yes', report on changes made to measurable goals and BMPs:

MCM(s)	Measurable Goal(s) or BMP(s)	Implemented or Proposed Changes (Submit NOC as needed)
N/A	N/A	N/A

Explain additional changes or proposed changes not previously mentioned (i.e. dates, contacts, procedures, annexation of land etc.):

N/A

G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

BMP	Description	Implementation Schedule (Start Date etc.)	Status / Completion Date (completed, in progress, not started)
N/A	N/A	N/A	N/A

H. Additional Information

1. Is the permittee relying on another entity to satisfy some of its permit obligations?

____Yes __X__ No

If 'Yes," provide the name(s) of other entities and an explanation of their responsibilities (add more spaces or pages if needed):

2.a. Is the permittee part of a group sharing a SWMP with other entities?

_____Yes __X__ No

2.b. If 'yes,' is this a system-wide annual report including information for all permittees?

____Yes __X__ No

If 'Yes,' list all associated authorization numbers, permittee names, and SWMP responsibilities of each member (add additional spaces or pages if needed):

Authorization Number: N/A Permittee: N/A

I. Construction Activities

1. The number of construction activities that occurred in the jurisdiction area of the MS4 (Large and Small Site Notices submitted by construction site operators): 14

2. a. Does the permittee utilize the optional seventh MCM related to construction?

____Yes __X__ No

2. b. If ‘yes,’ then provide the following information for this permit year:

The number of municipal construction activities authorized under this general permit	N/A
The total number of acres disturbed for municipal construction projects	N/A

J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name (printed):_____ Title:_____

Signature: _____ Date:_____

Name of MS4: _City of Sugar Land_____

Appendixes

Appendix A

City of Sugar Land

BMP Status for Permit Year: January 1, 2024 – December 31, 2024

Minimum Control Measure (MCMs)	Best Management Practices (BMPs)	BMP is appropriate for reducing the discharge of pollutants in storm water (yes or no). Explain.
1: Public Education, Outreach and Involvement	Stormwater Quality Education Materials	Yes, 1 stormwater educational brochure was developed to educate construction sites on Post Construction Stormwater requirements. Brochures educating residents on proper discharge methods of swimming pool water were provided to residents. Educational brochures on proper disposal methods of FOGs were provided to 365 food establishments during inspections.
	Storm Drain Marking Program	Yes, the City in conjunction with Keep Sugar Land Beautiful (KSLB) marks storm drains, no storm drains were marked during PY 6. Additionally, 11,166 storm drains were inspected in PY4 and 252 repairs of storm drains were conducted in PY 5.
	Community Events	Yes, the City sponsors and co-sponsors events to educate the community on the importance of stormwater management. Staff also attend Home Owner Association meetings, as requested, to provide information on stormwater and solid waste management. • The Don't Mess with Texas Trash-off event was resumed in PY6 where 103 volunteers collected 1,440 pounds of trash.
	Business Education Program	Yes, the Environmental and Neighborhood Services Department has various brouchers with stormwater educational material on them that are provided to the businesses. During industrial inspections we educated businesses on various BMPs.

1: Public Education, Outreach and Involvement	Speakers' Bureau	Yes, KSLB, conducted a series of events to inform and distribute material to residents, the public, and local schools on the effects of stormwater pollution and the importance of recycling and water conservation. During PY 6, the City, in partnership with KSLB, conducted 13 presentations that reached 351 individuals.
	311 Contact Center	Yes, the City records and responds to all illicit discharge service requests received through the 311 Contact Center. During PY 6, 9 illicit discharge reports were received and investigated. Reports are available upon request through the Open Records Request program.
	Adopt-A-Spot Program	Yes, on behalf of the City, KSLB administers the Adopt-a-Spot program. 417 volunteers conducted 209 clean-up events which prevented 3,260 pounds of trash and debris from entering our waterways.
	Texas Stream Team Water Quality Monitoring Program	Yes, the City and KSLB work together to manage the local Texas Stream Team program. During PY 5, the City in conjunction with Houston-Galveston Area Council (H-GAC), conducted a Texas Stream team training on November 4, 2023. 5 volunteers were trained and began sampling events in PY5.
	Reforestation Program	Yes, the City and KSLB hosted a tree planting event during PY 6, where 194 five-gallon trees were planted in Cullinan Park.

1: Public Education, Outreach and Involvement	Community & Student Environmental Education Classes	Yes, the City along with KSLB, conducts a series of events to inform and distribute material to residents, the public, HOAs, and local schools on the effects of stormwater pollution and the importance of recycling and water conservation. During PY 6, KSLB hosted 13 Going Green Together Speakers Bureau, a Earth Day Celebration and a Stormwater Pollution Presentation at the HMNS Sugar Land. During these events, participants learned about waste reduction, litter abatement, as well as other green initiatives.
	Social Media Outreach	Yes, the City utilizes social media to disperse educational material to residents. During PY 6, 7 social media posts were made to educate residents on illicit discharges, illegal dumping, proper solid waste handling and recycling. The City also had 248 views of the stormwater webpage: https://www.sugarlandtx.gov/332/Stormwater-Management-Program
	SWMP and Annual Report	Yes, the City has posted its SWMP on the stormwater webpage within 30 days of receiving approval; the City will also post all annual reports within 30 days of the TCEQ due date. All documents to be posted on the following page: https://www.sugarlandtx.gov/336/Regulatory

2: Illicit Discharge Detection and Elimination	Storm Sewer Mapping	The City's Public Works Department updated the preventative maintenance program in November 2021 to annually inspect all storm sewer manholes and inlets. In addition to collecting data regarding the system's current condition, Public Works staff also identify areas where GIS mapping needed to be revised.
2: Illicit Discharge Detection and Elimination	Household Recycling Program	Yes, the City continues its curbside Household Recycling program offered to residents of Sugar Land. The City discontinued its HHW collection program in 2021. The City currently facilitates a cooking oil and tire recycling drop off location. At this time, the City promotes the Fort Bend County Recycling Center for materials that cannot be collected curbside. In PY5 the City was awarded a Solid Waste Grant from H-GAC to host a HHW/Electronic Waste collection event in FY24/25. This event will be widespread and will give residents an opportunity to dispose of HHW/E-Waste in the correct and environmentally responsible manner. The event was held on October 19, 2024 and 32,207 lbs of HHW was collected. During PY 6 there were 4,698 views of the City's Drop Off Center webpage. https://www.sugarlandtx.gov/315/Drop-Off-Centers
	Storm Water Ordinance	Yes, the current Stormwater Ordinance No. 1788 was adopted in August of 2010. Staff completed the evaluation of the current ordinance and no revisions were identified for City Council approval.

2: Illicit Discharge Detection and Elimination	Illicit Discharge Detection and Elimination Program & Dry Weather Screening	Yes, the City and contracted crews inspect the municipal infrastructure for health and construction related concerns and respond to citizen requests regarding streets, drainage, and traffic. Personnel are available 24 hours a day to respond to all requests both emergency and routine. The Utilities Division manages the operation and maintenance of grease traps at businesses throughout the City. During PY 6, 570 grease trap inspections were performed. In addition, the City's Public Works Department continued their preventative maintenance program to annually inspect all storm sewer manholes and inlets. Dry weather screening was conducted in September 2023 during PY 5.
	Septic Systems	Yes, the City will reevaluate the sanitary sewer system to determine if any septic systems are currently in operation within the City. There is a pump and haul system at the facility housing the City's Visitor Center and Fort Bend Children's Discovery Center. City staff will respond to any complaints received regarding the facility's current operational system.
	Field Staff Training	Yes, the City continues to provide annual classroom training to City staff with the potential to encounter or respond to illicit discharges. • 75 City staff members from various departments attended annual training on December 11, 2024, to review the City's updated Stormwater Management Program and standard operating procedures for illicit discharge detection and elimination. The in-person training was provided by CDM Smith.
	Database of Businesses	Yes, the City's GIS team continues to update the business database on a yearly basis.

	Public Reporting of Illicit Discharges and Spills	Yes, the City records and documents illicit discharges and spills. Incident reports are available upon request through the Open Records Request program. The City received 9 reports of illicit discharges and spills in PY 6.
	Reduction of Floatables	Yes, the City currently has two floatable control structure installed at Jane Long Lake and a basin adjacent to Dairy Ashford. The City has developed a SOP for the floatables program.
	Grease Trap and Collection System Inspections	Yes, the City conducted 570 grease trap inspections. The City is currently looking to doing a CCTV contract to conduct inspections of the collection system.
3: Construction Site Storm Water Runoff Control	Construction Site Runoff & Waste Control Ordinances	Yes, the City adopted its current Storm Water Ordinance No. 1788 in August of 2010. Staff completed the evaluation of the current ordinance and no revisions were identified for City Council approval.
	Site Plan Review Program	Yes, the City's Development Review Committee (DRC) meets weekly to discuss all projects that are new and ongoing. The committee reviews all Land Disturbance Permits, including all erosion control plans and Notice of Intents. During PY 6, the City reviewed 100% of the 14 Land Disturbance Permit applications submitted.
	Construction Site Inspection Program	Yes, the City staff conducts inspections and responds to complaints received regarding construction sites within the City limits. If violations are found, a Notice of Violation is issued, and follow-up inspections are scheduled to ensure the site comes into compliance. The City conducted inspections at 50% of construction sites with Land Disturbance Permits (LDPs) approved in PY 6. Several sites with approved LDPs in PY 6 were not inspected because construction had not begun. In addition to the inspections conducted for LDPs approved in PY 6, the City conducted additional inspections at sites with approved LDPs from previous years.

3: Construction Site Storm Water Runoff Control	Pre-Construction Meetings	Yes, the City conducted a pre-construction meeting with 100% of contractors that had approved Land Disturbance Permits. Pre-construction meetings are scheduled with contractors and developers to review City development guidelines, including stormwater requirements for sites disturbing one acre or more.
	Construction Site Inventory	Yes, the City's Engineering Department reviews all Land Disturbance Permits for projects that are larger than one acre or less than one acre, but part of a larger development. The permits are then routed to the Environmental and Neighborhood Services Department, which logs all construction site permits, NOIs, NOCs and NOTs. In PY 6, there were a total of 14 Land Disturbance Permits approved.
	MS4 Staff Training	Yes, the City continues to provide annual classroom and field training to City staff on construction inspection procedures. • 75 City staff members from various departments attended annual training on December 11, 2024 to review Stormwater Pollution Prevention Plan (SWP3) requirements and construction site inspection procedures. The in-person training was conducted by CDM Smith.
4: Post-Construction Storm Water Management in New Development and Redevelopment	Post-Construction Stormwater Management Development Code	Yes, during PY 6 the City completed the evaluation of the current Development Code and no revisions were identified for approval.
	Post-Construction Stormwater Management Ordinance	Yes, during PY 6 the City completed the evaluation of the current ordinance and no revisions were identified for City Council approval.

	Post-Construction Development Review Procedures	Yes, during PY 4 the City developed a new system for the submission and approval of post-construction maintenance plans. During PY 6, 5 acknowledgement forms were received and 5 post-construction maintenance plans were submitted and reviewed by the City.
	Long-Term Operation and Maintenance Program	Yes, the City updated the procedures for long-term inspection and maintenance of structural controls in PY 4.
	Inspection Program	Yes, inspections for facilities who obtain a Post-Costruction stormwater quality permit began in PY5.
5: Pollution Prevention and Good Housekeeping for Municipal Operations	Permittee-owned Facilities and Control Inventory	Yes, the City's GIS Department continues to capture data by georeferencing plans, using GPS units, and loading data from electronic files that consultants submit. In November 2021, the Public Works Department updated the preventative maintenance program to inspect all storm sewer manholes and inlets.
	MS4 Training Program	Yes, the City continues to provide annual classroom training to staff on good housekeeping for municipal operations. • 75 City staff members from various departments attended annual training on December 11, 2024 to review standard operating procedures and good housekeeping techniques for City facilities. The in-person training was provided by CDM Smith.

5: Pollution Prevention and Good Housekeeping for Municipal Operations	Disposal of Waste Materials	Yes, the City developed standard operating procedures for waste disposal that complies with State and Federal disposal regulations in PY 4.
	Contractor Requirements and Oversight	Yes, the City evaluated the contract language for contractors that perform work on City-owned facilities and developing standard operating procedures to oversee contractor operations in PY 5.
	Municipal Operations and Maintenance Activities	Yes, the City conducted an assessment of municipal operations and maintenance activities during PY 2. Current SOPs continue to be updated in PY 6 based on the assessment findings. The City also continues to conduct visual inspections at City-owned facilities. In PY 6, 34 inspections were conducted at City-owned facilities.
	Structural Control Maintenance	Yes, the City's Public Works Department conducts routine maintenance on all City-owned structural controls.
	Storm Sewer System Operation and Maintenance	The City's Public Works Department continued their preventative maintenance program in PY 6 to annually inspect all storm sewer manholes and inlets. Data is collected during the inspection regarding the system's current condition to identify needed repairs. Repairs are prioritized based on available funding.

5: Pollution Prevention and Good Housekeeping for Municipal Operations	Street Sweeping Operation and Maintenance	Yes, during PY 6 the City's street sweeping contractor cleaned approximately 5,244 miles of non-residential streets and State roads. Services include cleaning of curbs, median curbs, turning lanes, and underpasses located in the City, as designated by staff. During PY 6, an estimated total of 1,800 cubic yards of litter was collected off the streets.
	Mapping of Facilities	Yes, the City's GIS Department continues to capture data on City-owned and operated facilities.
	Facility Assessment	Yes, the City conducted assessments of 11 City-owned facilities during PY 2 that were identified as high-priority facilities. A second assessment was conducted in PY 5.
	Facility Specific SOPs and Stormwater Controls for High Priority Facilities	Yes, SOPs and necessary stormwater controls for high-priority facilities continue to be updated in PY 6 based on the results of the facility assessment.
	Facility Inspection Program	Yes, facility inspection procedures continue to be updated in PY 5 based on the results of the facility assessment. The City also continues to conduct visual inspections at City-owned facilities. During PY 6, 34 inspections were conducted at City-owned facilities.
5: Pollution Prevention and Good Housekeeping for Municipal Operations	Pesticide, Herbicide, and Fertilizer Application and Management	Yes, during PY 1 the City developed Pesticide, Herbicide, and Fertilizer Management SOPs. These SOPs are utilized to evaluate landscape activities performed by City staff and contractors. Additionally, pesticide management training was conducted on on December 11, 2024, by a member of the CDM Smith.
	Evaluation of Flood Control Projects	Yes, the City took inventory of City owned and Operated flood control structures in PY 6.

6: Industrial Stormwater Sources	Public Education	Yes, the City made updates to the Stormwater page with MSGP requirements and other educational stormwater material. The City informed businesses of proper industrial stormwater practices during industrial inspections in PY6.
	Industrial Stormwater Sources Inspection Program	Yes, the City has developed inspection training and standard operating procedures for inspecting industrial facilities. The City began facility inspections in PY 5.
Recordkeeping and Reporting	Annual Report	Yes, the City has prepared the annual report to be submitted to TCEQ and its regional office.

Appendix B

City of Sugar Land

Measurable Goal Status for Permit Year: January 1, 2024 – December 31, 2024

MCM(s)	Measurable Goal(s)	Success
1	• Develop or acquire one stormwater quality education material for the City's environmental awareness campaign by December of each year (2019-2024).	Met Goal
	• Implement the Storm Drain Marking Program each year of the permit period (2019-2024) in all areas of the MS4. Inspect 20% of the total storm drain markers by December of each year (2019-2024) and install/replace markers on unmarked drains.	
	• Utilize at least one volunteer organization for program implementation each year (2019-2024).	
	• Sponsor and participate in at least one (1) "Don't Mess with Texas Trash-off" event by December of each year (2019-2024).	
	• Sponsor and participate in at least one (1) Earth Day Celebration community event by December of each year (2019-2024).	
	• Conduct at least one (1) business education program annually with KSLB by December of each year (2019-2024).	
	• Hold at least two (2) speaking events by December of each year (2019-2024).	
	• Record and classify all incoming 311 Contact Center calls regarding stormwater quality issues from January 1 to December 31 of each year (2019-2024).	
	• Distribute one type of educational outreach material to enhance 311 Contact Center exposure at one community event by December of each year (2019-2024).	
	• Investigate all complaints identified through the 311 Contact Center from January 1 to December 31 of each year (2019-2024).	
	• Perform one collection activity at all active Adopt-a-Spot locations by December of each year (2019-2024).	
	• Utilize at least one volunteer to perform water quality monitoring activities at all active monitoring locations on a monthly basis from January to December of each year (2019-2024).	
	• Distribute one type of educational outreach material to enhance program exposure at one community event by December of each year (2019-2024).	
	• Sponsor one Tree Celebration promoting community reforestation in honor of Arbor Day by December of each year (2019-2024).	
	• Apply for recertification in the Tree City USA Program by December of each year (2019-2024).	

	• Sponsor at least one community environmental education class and one student education presentation regarding water quality aspects such as stormwater, recycling, and conservation by December of each year (2019-2024).	
	• Use the City's social media platforms to provide four water quality educational posts to the public by December of each year (2019-2024).	
	• Post the approved SWMP and annual reports on City's stormwater webpage in compliance with TXR040000 requirements.	
2	• Update the storm sewer map to reflect all newly constructed infrastructure within the city limits by December of each year (2019-2024).	Met Goal
	• Collect 10,000 pounds of household hazardous and electronic waste through the City's collection programs by December of each year (2019-2024).	
	• Evaluate the existing City stormwater ordinance for potential updates and adopt any necessary modifications by December 2020.	
	• Implement modified ordinance from January 2021 through January 2024.	
	• Review and update the dry weather outfall screening, inspection, and detection program procedures by December 2021.	
	• Identify and document all high priority areas within the MS4 likely to have illegal dumping and illicit discharges by December 2021.	
	• Investigate and eliminate all found illicit discharges and perform follow up inspections from January 1 to December 31 of each year (2019-2024).	
	• Perform dry weather screening on 50% of the known City-owned outfalls in areas identified as having a high potential for illicit discharges by December of each year (2019-2024).	
	• Determine the number of septic systems within jurisdiction by December 2021.	
	• If septic systems are identified within jurisdiction, develop an inspection program to reduce the potential for system failure by December 2022.	
	• Respond to 100% of complaints received regarding septic systems from January 1 to December 31 of each year (2019-2024).	
	• Provide one training class to City staff that have the potential to encounter an illicit discharge by December of each year (2019-2024).	
	• Update the database to reflect active businesses within the MS4 jurisdiction by December of each year (2019-2024).	

	• Record and classify all incoming 311 Contact Center calls regarding stormwater quality issues from January 1 to December 31 of each year (2019-2024).	
	• Distribute one type of educational outreach material to enhance 311 Contact Center exposure at one community event by December of each year (2019-2024).	
	• Investigate all complaints identified through the 311 Contact Center from January 1 to December 31 of each year (2019-2024).	
	• Develop floatable control program procedures and identify one location where floatable material can be removed before discharge by December 2021.	
	• Complete installation of one floatable control structure by January 2024.	
	• Conduct two floatable monitoring events from January 2023 to December 2023.	
	• Continue to perform operation, maintenance, and inspections on 2% of the City's 500 miles of gravity main wastewater collection lines by December of each year (2019-2024).	
	• Perform one inspection at 100% of grease traps within MS4 jurisdiction by December of each year (2019-2024).	
3	• Evaluate the existing City stormwater ordinance for potential updates and adopt any necessary modifications by December 2020.	Met Goal
	• Evaluate the DRC process and modify policies and procedures to include pollution prevention assessments and receipt of information from the public by December 2020.	
	• Develop a pollution prevention checklist for site plan review by December 2020.	
	• Review 100% of submitted plans associated with a Land Disturbance permit application by December of each year (2019-2024).	
	• Review the construction site inspection procedures and inspection forms and update as necessary by December 2020.	
	• Conduct site inspections of 50% of active construction sites with an approved Land Disturbance permit by December of each year (2019-2024).	
	• Conduct a follow-up inspection for 100% of Notice of Violations (NOVs) issued and perform enforcement proceedings in accordance with the adopted stormwater ordinance from January to December of each year (2019-2024).	
	• Review the procedures for receipt and consideration of information submitted by the public and update as necessary by December 2020.	

	• Meet with 50% of all contractors that have approved Land Disturbance permits by December of each year (2019-2024).	
	• Update the inventory to reflect all active public and private construction sites disturbing one acre or more, or less than one acre but part of a larger development by December of each year (2019-2024).	
	• Record 100% of Land Disturbance permits approved by December of each year (2019-2024).	
	• Provide one training class to City staff associated with construction related activities by December of each year (2019-2024).	
4	• Evaluate the existing City Development Code for potential updates and adopt any necessary modifications by December 2020.	Met Goal
	• Document and maintain 100% of identified Development Code violations occurring each year from January 2021 through January 2024.	
	• Evaluate the existing City stormwater ordinance for potential updates and adopt any necessary modifications by December 2020.	
	• Document and maintain 100% of identified Ordinance violations occurring each year from January 2021 through January 2024.	
	• Review and update procedures for post-construction maintenance plan review by December 2021.	
	• Review 100% of post-construction maintenance plans submitted by December of each year (2019-2024).	
	• Review and update program procedures for long-term inspection and maintenance of structural controls by December 2021.	
	• Develop inspection program procedures for post-construction structural controls by December 2021.	
	• Conduct inspections at 20% of all City-owned and privately-owned facilities by December of each year (2022-2024).	
5	• Update the inventory of City-owned and operated facilities and stormwater controls by December of each year (2019-2024).	
	• Provide one training class to City field staff by December of each year (2019-2024).	

5	• Develop a standard operating procedure (SOP) for waste disposal that complies with State and Federal disposal regulations by December 2021.	Met Goal
	• Review and update contract language for contractors that perform work on City-owned facilities, where those activities have the potential to affect discharges to the City's MS4 by December 2021.	
	• Develop standard procedures to oversee that contractors are complying with updated contract terms by December 2021.	
	• Perform an assessment of municipal operations and maintenance activities and identify associated pollutants of concern by December 2021.	
	• Develop procedures to implement stormwater BMPs as deemed necessary in the municipal operations assessment by December 2022.	
	• Develop written procedures describing the frequency and steps for performing visual inspections by December 2022.	
	• Perform quarterly visual inspections of pollution prevention measures at all high-priority City-owned facilities by December of each year (2019-2024).	
	• Develop maintenance program procedures for structural controls by December 2021.	
	• Review and update storm sewer operation and maintenance procedures by December 2021.	
	• Inspect 50% of storm sewer inlets by December of each year (2019-2024).	
	• Review and update procedures for the street sweeping program to include sweeping frequency, schedule, and waste disposal methods by December 2021.	
	• Perform street sweeping on 3000 miles of roadway by December of each year (2019-2024).	
	• Update the map to reflect all City-owned and operated facilities by December of each year (2019-2024).	
	• Conduct an assessment of City-owned facilities for their potential to discharge pollutants and identify high-priority facilities by December 2021.	
	• Update high-priority facility SOPs to include BMPs specified in TXR040000 Part III.B.5(c)6)a-d by December 2021.	
	• Implement updated high-priority facility SOPs during quarterly facility inspections from January 2022 through January 2024.	

5	• Review and update the facility inspection program procedures by December 2021.	Met Goal
	• Perform quarterly visual inspections at all high-priority City-owned facilities by December of each year (2019-2024).	
	• Perform an assessment of materials used and landscape activities performed at City-operated public spaces by December 2021.	
	• Develop chemical application schedules and disposal procedures by December 2021.	
	• Provide one training class on pesticide, fertilizer, and herbicide applications and proper management techniques by December of each year (2019-2024).	
	• Inventory all City-owned flood control structures and evaluate their potential to minimize impacts to receiving waters by December 2021.	
	• Develop design, construction, and maintenance criteria for future City-owned flood control structure projects by December 2022.	
	• Implement design, construction, and maintenance criteria for new City-owned flood control projects and document retrofitting/non-structural control activities on existing City-owned flood control structures by January 2024.	
6	• Identify and update a database of all MSGP regulated entities within the City's MS4 jurisdiction by December of each year (2019-2024).	Met Goal
	• Develop or acquire one educational material for the City's Industrial Stormwater Sources Inspection Program by December of each year (2019-2024).	
	• Develop inspection program procedures for industrial stormwater sources by December 2021.	
	• Conduct one inspection at 100% of private facilities that require compliance with the MSGP that lie within the City's regulated MS4 area by January 2024.	
	• Conduct one inspection at 100% of City-owned and operated facilities that require compliance with the MSGP by January 2024.	