

March 23, 2019

Texas Commission on Environmental Quality  
Stormwater Team Leader (MC-148)  
P.O. Box 13087  
Austin, Texas 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 1. The reporting period's beginning January 1, 2019 and ending December 31, 2019.

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,

Taylor Danesi  
Environmental Manager



**CITY OF SUGAR LAND  
STORMWATER MANAGEMENT PROGRAM ANNUAL REPORT**

**Permit Year 1  
January 1, 2019 – December 31, 2019**

**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): 1

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) 01/01/2019

Reporting period end date (month/date/year) 12/31/2019

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

Contact Name: Taylor Danesi \_\_\_\_\_ Telephone Number: 281.275.2497 \_\_\_\_\_

Mailing Address: 111 Gillingham Lane Sugar Land, TX 77479

E-mail Address: tdanesi@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 met goals for Reporting Year Jan. 2019 – Dec. 2019.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		The City met recordkeeping and reporting requirements during Jan. 2019 – Dec. 2019.
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. 2019 – Dec. 2019.
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	385	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	3505	Pounds of garbage collected.	Yes. Volunteers collect garbage from various locations, reducing the amount of material entering our waterways.
1	Public Education	Adopt-A-Spot Program	2,120	Pounds of garbage collected.	Yes. Volunteers collect garbage from various locations, reducing the amount of material entering our waterways.

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)</b>
1	Public Education	Social Media Outreach	29 social media posts  254 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	60	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	107.8	Tons of material collected.	Yes. Providing a disposal method for HHW prevents material from being illegally dumped in the MS4.
2	Detection and Elimination	Illicit Discharges and Spills	46	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.

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)</b>
2	Detection and Elimination	Grease Trap Inspections	354	Number of grease trap inspections conducted.	Yes. Inspecting grease traps routinely helps reduce the number of SSO's.
3	Construction Site Inspection	Construction sites	20	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	7	Post-construction maintenance plans.	No. The reduction in pollutants will be reduced over time as the permanent post construction BMPs are utilized.
5	Facility Inspection Program	Standard Operation Procedures	40	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.?

City staff investigated all 46 illicit discharge complaints received via the 311 Contact Center. City staff conducted 12 pre-construction meetings with contractors, 37 pre-development meetings with contractors and inspected 16 active construction sites during PY 1. 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 900 yards of debris during routine street sweeping throughout PY 1.

## 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 2016 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 developed pesticide, herbicide and fertilizer management standard operating procedures during PY 1 to be implemented by City staff and contractors. As part of the City's updated SWMP, bacteria and dissolved oxygen monitoring will be conducted in PY 2 and PY 4. 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. As a joint effort between the City and private residents, the Adopt-a-Spot program began expansion to include Dogplogging; an activity that involves collecting pet waste and trash while walking your pet.

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

<u>Activity</u>	<u>Pollutant of Concern</u>	<u>Measurable Goal</u>	<u>Evaluation</u>
Monitoring 1.1: Support BIG Regional BMP Database Effort	Bacteria	Support BIG's development of a regional BMP database.	The City will continue to provide information regarding BMP implementation, monitoring or sampling data, as requested.

Monitoring 1.2: Review DMR/SSO Data over Next 5 Years	Bacteria	Collect discharge monitoring report (DMR) and SSO data.	The City will continue to provide DMR and SSO data for WWTP's in the watershed for the next five years.
Monitoring 1.5: Conduct Additional Monitoring	Bacteria and DO	Conduct additional monitoring.	The City will conduct 24-hour DO and bacteria sampling in key areas of the watershed during PY 2 & PY 4.
Research 2.3: Evaluate Future Sampling Data	Bacteria and DO	Continue work with BRA and TCEQ to acquire sampling data.	The City will provide any bacteria or DO sampling data to the TCEQ and BRA for the Basin Summary Report, as requested.
Education and Outreach 3.1: Deliver the Lone Star Healthy Stream Program Feral Hog Component	Bacteria and DO	Removal of feral hogs within the jurisdiction.	The City has an ongoing process for the removal of feral hogs. A total of 13 feral hogs were removed during PY 1.

Education and Outreach 3.2: Urban/Suburban Education and Outreach	Bacteria and DO	Seek opportunities to expand education programs.	The City, in collaboration with Keep Sugar Land Beautiful (KSLB) and private residents, began expanding the Adopt-a-Spot Program to include Dogplogging; an activity that involves collecting pet waste and trash while walking your pet.
Education and Outreach 3.4: Stream Team Volunteering Sampling	DO	Continue stream team volunteer sampling.	The City continues to participate in the Texas Stream Team Program. The City hosted a H-GAC Stream Team Volunteer training on September 20, 2019. During PY 1, the City had 2 trained volunteers that conducted monthly water quality monitoring within the City limits. Information about the program and/or registration is available on the City's stormwater webpage. <a href="https://www.sugarlandtx.gov/335/Public-Involvement">https://www.sugarlandtx.gov/335/Public-Involvement</a>
General Nonpoint Source Management 5.4: Dog Parks and Dog Waste Stations	Bacteria	Maintain dog parks and installation of dog waste stations.	Pet waste stations are located throughout community parks within the City. During the PY 1, a total of 89,000 dog waste bags were collected from the various pet waste stations.
General Nonpoint Source Management 5.7: Domestic Oil Recycling Program	DO	Continue domestic waste oil recycling program.	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.

<p>General Nonpoint Source Management 5.8: Household Hazardous Waste (HHW) Collection Event</p>	<p>DO</p>	<p>Continue HHW collection program.</p>	<p>On March 2014, the City enhanced its Solid Waste and Recycling Program by adding curbside collection of Household Hazardous Waste (HHW) and Electronic Waste. The program provides residents the ability to dispose of hazardous household items used in their homes in the most cost efficient, safe and environmentally compliant manner. For PY 1, the on-call curbside collection program was utilized 1,701 times and 215,598 pounds of material was collected for proper disposal and/or recycling. The City also began developing a joint education effort with Fort Bend County Recycling Center to promote their services.</p>
<p>Urban MS4 Stormwater Management 6.1: MS4 Phase II Activities</p>	<p>Bacteria and DO</p>	<p>Continue MS4 Phase II activities.</p>	<p>The City continues with MS4 activities and has a focus on bacteria and oxygen demanding pollutants as part of the Public Education, Outreach and Involvement and Illicit Discharge Detection and Elimination Programs. Details provided in Appendix A.</p>
<p>Urban MS4 Stormwater Management 6.2: Ordinance for Pet Waste and Waste Haulers</p>	<p>Bacteria and DO</p>	<p>Develop ordinance for pet waste and waste haulers.</p>	<p>The City began 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. Any necessary updates or revisions will be completed in PY 2. During PY 1, the City licensed 26 commercial liquid waste haulers.</p>
<p>Sanitary Sewer Collection Systems 11.3: Fats, Oils, and Grease Requirements</p>	<p>Bacteria</p>	<p>Recommend that collection system owners evaluate their regulations regarding fats, oils, and grease (FOGs).</p>	<p>The City began evaluation of its ordinances regarding liquid waste operator regulations. Any necessary updates or revisions will be completed in PY 2.</p>

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

<b>Benchmark Parameter</b>	<b>Benchmark Value</b>	<b>Description of additional sampling or other assessment activities</b>	<b>Year(s) conducted</b>
Bacteria	4,570 Billion cfu/d	The City will perform bacteria sampling in Upper Oyster Creek during PY 2.	PY 2
Dissolved Oxygen (DO)	4.0 mg/L 24-Hour Average DO concentrations	The City will perform 24-Hour DO sampling in Upper Oyster Creek during PY 2.	PY 2

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

<b>Benchmark Parameter</b>	<b>Selected BMP</b>	<b>Contribution to achieving Benchmark</b>
Bacteria	<ul style="list-style-type: none"> <li>• Stormwater Quality Education Materials</li> <li>• Community Events</li> <li>• Texas Stream Team Water Quality Monitoring Program</li> <li>• Social Media Outreach</li> <li>• Detection and Elimination Program</li> <li>• MS4 Staff Training</li> </ul>	<p>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. Two Texas Stream Team volunteers collected samples at 2 sites in the City. 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.</p>
Dissolved Oxygen (DO)		

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

<b><u>Description of Bacteria</u></b> <b><u>Focused BMP</u></b>	<b><u>Comments/Discussion</u></b>
<ul style="list-style-type: none"> <li>• Make Improvements to Reduce Overflows</li> <li>• Address Lift Station Inadequacies</li> <li>• Improve Reporting of Overflows</li> <li>• Strengthen Requirements to Reduce Blockages from Fats, Oils, and Grease (FOGs)</li> </ul>	<p>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 133 sanitary sewer lift stations and four wastewater treatment plants. During PY 1, 354 grease trap routine inspections were performed by the City. Staff maintains a database detailing the dates of the inspection and inspection rating. During PY 1, the City licensed 26 commercial liquid waste haulers.</p>
<ul style="list-style-type: none"> <li>• Identify and Address Failing Systems</li> <li>• Address Inadequate Maintenance of OSSFs</li> </ul>	<p>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.</p>
<ul style="list-style-type: none"> <li>• Continue Effort to Reduce Waste Sources of Bacteria</li> </ul>	<p>During PY 1, the City responded to a total of 46 illicit discharge service requests.</p>

<ul style="list-style-type: none"> <li>• Continue Management Programs to Identify and Target Animal Sources</li> </ul>	<p>The City removed a total 13 feral hogs during PY 1.</p>
<ul style="list-style-type: none"> <li>• Bacteria Discharging from a Residential Site During Runoff Event or Directly</li> <li>• Fats, Oils, and Grease (FOG) Clogging Sanitary Sewer Lines &amp; Resulting Overflows</li> <li>• Decorative Ponds</li> <li>• Pet Waste</li> </ul>	<p>The City developed educational materials for distribution under its Public Education, Outreach and Involvement program that focuses on the impacts of bacteria on receiving streams. The City also developed a restaurant brochure focusing on FOG issues and the reporting of overflows for distribution to its customers. The City currently provides educational programs and is developing new material regarding decorative ponds. 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 1, the City collected 89,000 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.</p>



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

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
Number of Illegal Dumping Reported	There were 21 complaints of illegal dumping for PY 1.
Reduction in Animal Sources	The City removed 13 feral hogs throughout the City. Personal pet waste bags were distributed at community events, and the City's Parks Department collected 89,000 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 1, a total of 28 presentations were conducted at various events.

## E. Stormwater Activities

Describe activities planned for the next reporting year:

<u>MCM(s)</u>	<u>BMP</u>	<u>Stormwater Activity</u>	<u>Description/Comments</u>
Impaired Water Bodies	Conduct additional monitoring	Monitor for 24-hour DO levels and bacteria in key areas of the watershed.	Monitoring to be conducted during PY 2 and PY 4, with data evaluation every two years.
2. Illicit Discharge Detection and Elimination 3. Construction Site Stormwater Runoff Control 4. Post-Construction Stormwater Management in New Development and Redevelopment	Stormwater Ordinance	Evaluate the existing stormwater and other related ordinances and update, as needed.	Ordinances will be reviewed for any necessary updates during PY 2.

## 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

2. 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.

<b>BMP</b>	<b>Description</b>	<b>Implementation Schedule (Start Date etc.)</b>	<b>Status / Completion Date (completed, in progress, not started)</b>
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  No

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

Name and Explanation: N/A

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

Yes  No

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

Yes  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): 17

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

Yes  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, 2019 – December 31, 2019



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 and Outreach	Stormwater Quality Education Materials	Yes, 7 different stormwater, solid waste, and recycling educational brochures were developed to educate residents of the City’s Environmental programs. Brochures were provided to residents at all 28 outreach events, including the City’s annual Earth Day event and Fort Bend Christian’s Career Day. Information was dispersed directly to Home Owner Associations (HOA) for inclusion in HOA newsletters. The City also includes Program information via monthly E-News reports and social media platforms.
	Storm Drain Marking Program	Yes, the storm drain marking program educates citizens on the impacts of illicit discharges and littering to the storm drain system. During PY 1, 33 volunteers marked 385 storm drains.

<p>1: Public Education and Outreach</p>	<p>Community Events</p>	<p>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.</p> <ul style="list-style-type: none"> <li>• The Reduce, Reuse, Recycle &amp; Rock Earth Day Event - the City of Sugar Land partnered with Keep Sugar Land Beautiful (KSLB) and Planned Community Developers to host a celebration at Sugar Land Town Square Plaza. The event featured 30 exhibitors and approximately 2,500 attendees. Guests enjoyed environmental activity booths and performances such as the Nutty Scientist group who conducted water quality experiments and the Nature and Eclectic Outdoors group who exhibited environmentally conscious outdoor activities. The City also had a stormwater interactive booth that allowed children and parents to learn about the movement of water and the many sources of water pollution through an Enviroscape watershed model.</li> <li>• Don't Mess with Texas Trash-off- the City partnered with KSLB to host the 26th annual Trash-off event. On April 6, 2019, 223 volunteers collected 3,505 pounds of garbage at designated locations throughout the City.</li> </ul>
	<p>Business Education Program</p>	<p>Yes, the City in partnership with KSLB conducted 2 educational events at local businesses.</p>

<p>1: Public Education and Outreach</p>	<p>Speakers' Bureau</p>	<p>Yes, the City along with 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 1, the City conducted 6 presentations for local organizations. An additional 13 presentations were conducted in partnership with KSLB.</p>
	<p>311 Contact Center</p>	<p>Yes, the City records and responds to all illicit discharge service requests received through the 311 Contact Center. During PY 1, 46 illicit discharge reports were received and investigated. Reports are available upon request through the Open Records Report program.</p>
	<p>Adopt-A-Spot Program</p>	<p>Yes, on behalf of the City, KSLB administers the Adopt-a-Spot program. During PY 1, 385 volunteers conducted 45 clean-up events which prevented 2,120 pounds of trash and debris from entering our waterways.</p>
	<p>Texas Stream Team Water Quality Monitoring Program</p>	<p>Yes, the City and KSLB work together to manage the local Texas Stream Team program. On September 20, 2019, the City hosted a H-GAC Stream Team Volunteer training. During PY 1, the City had 2 trained volunteers that conducted water quality monitoring within the City limits.</p>
	<p>Reforestation Program</p>	<p>Yes, the City participates in the Tree City USA Program. The City and KSLB hosted one tree planting event during PY 1, where 250 five-gallon trees were planted in Brazos River Park.</p>

<p>1: Public Education and Outreach</p>	<p>Community &amp; Student Environmental Education Classes</p>	<p>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 1, the City conducted 104 residential irrigation system evaluations; 21 Learning to Be Water Wise Educational Programs for 2,254 students; 10 Steve Trash Educational Programs for 2,734 local elementary students. An additional 4 presentations were conducted in partnership with KSLB.</p>
	<p>Social Media Outreach</p>	<p>Yes, The City utilizes social media to disperse educational material to residents. During PY 1, 29 social media posts were made to educate residents on illicit discharges, illegal dumping, proper solid waste handling and recycling. The City also had 254 views of the stormwater webpage:  <a href="https://www.sugarlandtx.gov/332/Stormwater-Management-Program">https://www.sugarlandtx.gov/332/Stormwater-Management-Program</a></p>
	<p>SWMP and Annual Report</p>	<p>Yes, the City will post 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:  <a href="https://www.sugarlandtx.gov/336/Regulatory">https://www.sugarlandtx.gov/336/Regulatory</a></p>
<p>2: Illicit Discharge Detection and Elimination</p>	<p>Storm Sewer Mapping</p>	<p>The City’s Public Works Department initiated a preventative maintenance program in October 2019 to annually inspect all storm sewer manholes and inlets. In addition to collecting data regarding the system’s current condition, Public Works staff also identified areas where GIS mapping needed to be revised.</p>

<p>2: Illicit Discharge Detection and Elimination</p>	<p>Household Recycling Program</p>	<p>Yes, the program provides residents with the ability to dispose of hazardous household items and electronics used in their homes in the most cost efficient, safe, and environmentally compliant manner. During PY 1, the on-call curbside collection program was utilized 1,701 times and 215,598 pounds of material was collected for proper disposal and/or recycling. The City also promotes the Fort Bend County Recycling Center for materials that cannot be collected curbside. During PY 1, there were 4,074 views of the City’s Drop Off Center webpage.  <a href="https://www.sugarlandtx.gov/315/Drop-Off-Centers">https://www.sugarlandtx.gov/315/Drop-Off-Centers</a></p>
	<p>Storm Water Ordinance</p>	<p>Yes, the current Stormwater Ordinance No. 1788 was adopted in August of 2010. Staff began evaluating the current ordinance for any necessary changes or revisions; Any revisions identified will be adopted during PY 2.</p>
	<p>Illicit Discharge Detection and Elimination Program &amp; Dry Weather Screening</p>	<p>Yes, the City and contracts crews inspect the municipal infrastructure for health and construction related concerns and responds 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 1, 354 grease trap inspections were performed. In addition, the City’s Public Works Department initiated a preventative maintenance program to annually inspect all storm sewer manhole and inlets. Data from these inspections is being utilized to identify high-priority areas for focused dry weather screening.</p>
	<p>Septic Systems</p>	<p>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.</p>

2: Illicit Discharge Detection and Elimination	Field Staff Training	<p>Yes, the City continues to provide annual classroom training to City staff with the potential to encounter or respond to illicit discharges.</p> <ul style="list-style-type: none"> <li>• 15 City staff members from various departments attended annual training on September 5, 2019, to review the City’s updated Stormwater Management Program and standard operating procedures for illicit discharge detection and elimination. Training was provided by RJN Group, Inc.</li> <li>• 4 City staff members from the Environmental Department attended a training on September 17, 2019 to review sample collection procedures. Training was provided by RJN Group, Inc.</li> </ul>
	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 46 reports of illicit discharges and spills in PY 1. The City has undertaken an Enterprise Resource Planning replacement project expected to be complete in 2023. The project includes transitioning current City software to a more integrated system, allowing for less manual processes and easier access to public reporting features.
	Reduction of Floatables	Yes, the City currently has one floatable control structure installed at Jane Long Lake. Further program development and identification of a location for an additional structure will be completed during PY 2 and PY 3.
	Grease Trap and Collection System Inspections	Yes, the City inspected 10 miles of wastewater collection lines and conducted 354 grease trap inspections.
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 began evaluating the current ordinances for any necessary changes or revisions; Any revisions identified will be adopted during PY 2.

<p>3: Construction Site Storm Water Runoff Control</p>	<p>Site Plan Review Program</p>	<p>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 1, the City reviewed 100% of the 31 Land Disturbance Permit applications submitted.</p>
	<p>Construction Site Inspection Program</p>	<p>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 41% of construction sites with Land Disturbance Permits (LDPs) approved in PY 1. Several sites with approved LDPs in PY 1 were not inspected because construction had not begun. In addition to the inspections conducted for LDPs approved in PY 1, the City conducted 13 additional inspections at sites with approved LDPs from previous years.</p>
	<p>Pre-Construction Meetings</p>	<p>Yes, the City conducted a pre-construction meeting with 71% 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.</p>
	<p>Construction Site Inventory</p>	<p>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. There were a total of 17 Land Disturbance Permits approved in PY 1.</p>

<p>3: Construction Site Storm Water Runoff Control</p>	<p>MS4 Staff Training</p>	<p>Yes, the City continues to provide annual classroom and field training to City staff on construction inspection procedures.</p> <ul style="list-style-type: none"> <li>12 City staff members from various departments attended annual training on September 4, 2019 to review Stormwater Pollution Prevention Plan (SWP3) requirements and construction site inspection procedures. Training was conducted by RJN Group, Inc.</li> </ul>
<p>4: Post-Construction Storm Water Management in New Development and Redevelopment</p>	<p>Post-Construction Stormwater Management Development Code</p>	<p>Yes, during PY 1 the City began evaluation of its Development Code to determine if any modifications were necessary. Any identified revisions will be adopted during PY 2.</p>
	<p>Post-Construction Stormwater Management Ordinance</p>	<p>Yes, during PY 1 the City began evaluation of its Ordinances to determine if any modifications were necessary. Any identified revisions will be adopted during PY 2.</p>
	<p>Post-Construction Development Review Procedures</p>	<p>Yes, during PY 1 the City began including the post-construction requirements as part of pre-construction meeting with contractors. During PY 1, 11 acknowledgement forms were received and 7 post-construction maintenance plans were submitted and reviewed by the City.</p>
	<p>Long-Term Operation and Maintenance Program</p>	<p>Yes, the City began evaluation of the Operation and Maintenance Program to identify any necessary revisions.</p>
	<p>Inspection Program</p>	<p>Yes, the City is currently developing the post-construction inspection program. Program development will be completed during PY 3.</p>



<p>5: Pollution Prevention and Good Housekeeping for Municipal Operations</p>	<p>Permittee-owned Facilities and Control Inventory</p>	<p>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 October 2019, the Public Works Department initiated a preventative maintenance program to inspect all storm sewer manholes and inlets. Part of this program includes updating the GIS mapping data to reflect what is located during inspections.</p>
	<p>MS4 Training Program</p>	<p>Yes, the City continues to provide annual classroom training to staff on good housekeeping for municipal operations.</p> <ul style="list-style-type: none"> <li>• 63 City staff members from various departments attended annual training on August 27, 2019 to review standard operating procedures and good housekeeping techniques for City facilities. The training was provided by RJN Group, Inc.</li> </ul>
	<p>Disposal of Waste Materials</p>	<p>Yes, the City is currently developing waste disposal standard operating procedures. SOP development is a joint effort among several departments that is expected to be completed in PY 3.</p>
	<p>Contractor Requirements and Oversight</p>	<p>Yes, the City began insourcing Right-of-Way (ROW) landscaping during PY 1. Until insourcing is complete, the ROW Division and the Parks and Recreation Department will require contractors to dispose of litter from the ROW on a weekly basis and keep grass clippings out of the storm drains. The City is also evaluating contract language to require contractors to comply with the City’s SWMP. Contract revisions are expected to be completed in PY 3.</p>

<p>5: Pollution Prevention and Good Housekeeping for Municipal Operations</p>	<p>Municipal Operations and Maintenance Activities</p>	<p>Yes, the City will conduct an assessment of municipal operations and maintenance activities during PY 2. Current SOPs will be updated based on the assessment findings. The City also continues to conduct visual inspections at City-owned facilities. In PY 1, 40 inspections were conducted at City-owned facilities.</p>
	<p>Structural Control Maintenance</p>	<p>Yes, the City’s Public Works Department conducts routine maintenance on all City-owned structural controls.</p>
	<p>Storm Sewer System Operation and Maintenance</p>	<p>The City’s Public Works Department initiated a preventative maintenance program in October 2019 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.</p>
	<p>Street Sweeping Operation and Maintenance</p>	<p>Yes, during PY 1 the City’s street sweeping contractor spent 16 to 20 days per month sweeping and cleaning approximately 436.30 miles of non-residential streets and State roads. Services include cleaning of all curbs, median curbs, turning lanes, and underpasses located in the City, as designated by staff. During PY 1, an estimated total of 900 yards of litter was collected off the streets.</p>
	<p>Mapping of Facilities</p>	<p>Yes, the City’s GIS Department continues to capture data on City-owned and operated facilities.</p>
	<p>Facility Assessment</p>	<p>Yes, the City will conduct an assessment of City-owned facilities during PY 2 to identify high-priority facilities.</p>
	<p>Facility Specific SOPs and Stormwater Controls for High Priority Facilities</p>	<p>Yes, SOPs and necessary stormwater controls for high-priority facilities will be updated based on the results of the facility assessment.</p>

5: Pollution Prevention and Good Housekeeping for Municipal Operations	Facility Inspection Program	Yes, facility inspection procedures will be updated based on the results of the facility assessment. The City also continues to conduct visual inspections at City-owned facilities. During PY 1, 40 inspections were conducted at City-owned facilities and 24 inspections were conducted at City-owned wastewater treatment plants operated by Brazos River Authority.
	Pesticide, Herbicide, and Fertilizer Application and Management	Yes, during PY 1 the City developed Pesticide, Herbicide, and Fertilizer Management SOPs. These SOPs will be utilized to evaluate landscape activities performed by City staff and contractors. The City utilizes Republic Services' HHW collection program to dispose of unused chemicals.
	Evaluation of Flood Control Projects	Yes, the City anticipates beginning to inventory flood control structures during PY 2.
6: Industrial Stormwater Sources	Public Education	Yes, the City has identified the regulated entities within its jurisdiction that will be subject to the Industrial Stormwater Sources Program.
	Industrial Stormwater Sources Inspection Program	Yes, the City has developed an inspection decision tree and inspection procedures for industrial facilities. The City anticipates beginning facility inspections during PY 4.
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, 2019 – December 31, 2019

MCM(s)	Measurable Goal(s)	Success
1	<ul style="list-style-type: none"> <li>Develop and acquire stormwater educational materials for the City’s environmental awareness campaign.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>Expand the Storm Drain Marking Program throughout the permit period to mark new areas of the MS4.</li> </ul>	
	<ul style="list-style-type: none"> <li>Utilize volunteer organizations for program implementation.</li> </ul>	
	<ul style="list-style-type: none"> <li>Inspect 20% of the total storm drain markers annually and replace markers as needed.</li> </ul>	
	<ul style="list-style-type: none"> <li>Sponsor and participate in at least one "Don't Mess with Texas Trash-off".</li> </ul>	
	<ul style="list-style-type: none"> <li>Sponsor and participate in at least one Earth Day Celebration community event.</li> </ul>	
	<ul style="list-style-type: none"> <li>Conduct at least one program annually with KSLB.</li> </ul>	
	<ul style="list-style-type: none"> <li>Hold at least two (2) speaking events.</li> </ul>	
	<ul style="list-style-type: none"> <li>Report number of calls regarding stormwater quality concerns.</li> </ul>	
	<ul style="list-style-type: none"> <li>Develop and distribute educational outreach materials to enhance 311 Contact Center exposure.</li> </ul>	
	<ul style="list-style-type: none"> <li>Respond to complaints identified through the 311 Contact Center.</li> </ul>	
	<ul style="list-style-type: none"> <li>Perform collection activities at active Adopt-a-Spot locations.</li> </ul>	
	<ul style="list-style-type: none"> <li>Perform water quality monitoring activities at active monitoring locations on a monthly basis.</li> </ul>	
	<ul style="list-style-type: none"> <li>Develop and/or distribute educational outreach materials to enhance program exposure and publicity.</li> </ul>	
	<ul style="list-style-type: none"> <li>Sponsor a Tree Celebration promoting community reforestation in honor of Arbor Day.</li> </ul>	
<ul style="list-style-type: none"> <li>Participate in the Tree City USA Program.</li> </ul>		
<ul style="list-style-type: none"> <li>Sponsor at least one community environmental education class and student presentation that includes water quality aspects such as stormwater, recycling, and conservation.</li> </ul>		
<ul style="list-style-type: none"> <li>Use the City of Sugar Land's social media page(s) to provide updates, event schedules and water quality educational information to the public.</li> </ul>		
<ul style="list-style-type: none"> <li>Post approved SWMP and annual reports on City's stormwater webpage.</li> </ul>		

2	<ul style="list-style-type: none"> <li>• Continue to complete data capture of all new infrastructure within the City limits.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>• Continue to publicize Fort Bend County's Recycling and HHW Collection Center.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Continue to provide household hazardous and electronic waste collection programs.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Evaluate the existing stormwater and other related ordinances and update, as needed.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Implement ordinance.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Review and update the dry weather outfall screening, inspection, and detection program procedures.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Identify high priority areas likely to have illegal dumping and illicit discharges.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Investigate and eliminate all found illicit discharges and perform follow up inspections.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Perform dry weather screening on 50% of the known City-owned outfalls in the areas identified as having a higher potential for illicit discharges.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Evaluate the need to implement a septic system inspection program.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop a septic system inspection program, if necessary.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Respond to 100% of complaints regarding septic systems.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Compile a list of courses, presenters, and training materials provided to City staff.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Continue to modify and update the database of businesses, as needed.</li> </ul>	
	3	
<ul style="list-style-type: none"> <li>• Develop floatables program identifying at least two locations where floatable material can be removed before discharge.</li> </ul>		
<ul style="list-style-type: none"> <li>• Complete installation of one additional floatable control structure.</li> </ul>		
<ul style="list-style-type: none"> <li>• Conduct two floatables monitoring events in one calendar year.</li> </ul>		
<ul style="list-style-type: none"> <li>• Continue to perform operation, maintenance, and inspections on wastewater collection lines throughout the City.</li> </ul>		
	<ul style="list-style-type: none"> <li>• Continue to perform grease trap inspections at businesses throughout the City.</li> </ul>	Met Goal

3	implement ordinances, as needed.	Met Goal
	<ul style="list-style-type: none"> <li>Evaluate the Development Review Committee (DRC) process and modify policies and procedures to include pollution prevention assessments and receipt of information from the public.</li> </ul>	
	<ul style="list-style-type: none"> <li>Develop pollution prevention checklists for site plan review.</li> </ul>	
	<ul style="list-style-type: none"> <li>Review 100% of submitted plans associated with a Land Disturbance permit application.</li> </ul>	
	<ul style="list-style-type: none"> <li>Review and update construction site inspection procedures and inspection forms.</li> </ul>	
	<ul style="list-style-type: none"> <li>Conduct site inspections of 50% of active construction sites with approved Land Disturbance permit.</li> </ul>	
	<ul style="list-style-type: none"> <li>Perform enforcement proceedings in accordance with the adopted construction site ordinances.</li> </ul>	
	<ul style="list-style-type: none"> <li>Resolve all noncompliance issues in a timely manner.</li> </ul>	
	<ul style="list-style-type: none"> <li>Review and update the procedures for receipt and consideration of information from the public.</li> </ul>	
	<ul style="list-style-type: none"> <li>Meet with at least 50% of all contractors that have approved Land Disturbance permit.</li> </ul>	
	<ul style="list-style-type: none"> <li>Develop an inventory all active public and private construction sites disturbing one acre or more, or less than one acre but part of a larger common development.</li> </ul>	
	<ul style="list-style-type: none"> <li>Track Land Disturbance permits.</li> </ul>	
	<ul style="list-style-type: none"> <li>Conduct training for all staff associated with construction related activities.</li> </ul>	
4	<ul style="list-style-type: none"> <li>Evaluate and modify existing development code.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>Adoption of development code modifications by Council.</li> </ul>	
	<ul style="list-style-type: none"> <li>Implementation of modified development code.</li> </ul>	
	<ul style="list-style-type: none"> <li>Evaluate existing ordinances for post-construction and significant redevelopment. Modify, develop and present ordinances to Council.</li> </ul>	
	<ul style="list-style-type: none"> <li>Conduct public review proceedings in accordance with state and local public notice requirements.</li> </ul>	
	<ul style="list-style-type: none"> <li>Implementation of the modified ordinance.</li> </ul>	
	<ul style="list-style-type: none"> <li>Evaluate and revise existing procedures for post-construction maintenance plan review.</li> </ul>	

4	<ul style="list-style-type: none"> <li>• Implement updated procedures.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>• Review submitted plans.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Review and revise the plan review process to ensure long-term inspection and maintenance of structural controls.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop inspection program for post-construction structural controls.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Conduct inspections at 50% of all City-owned and privately-owned facilities.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Retain documentation of completed inspection forms, follow-up, and enforcement, to be made available for review by the TCEQ.</li> </ul>	
5	<ul style="list-style-type: none"> <li>• Update inventory of City-owned and operated facilities and stormwater controls.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>• Develop and implement training modules.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Provide annual training to municipal operations employees.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop a standard operating procedure (SOP) for waste disposal that complies with State and Federal disposal regulations.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Review and modify contract language for contractors performing work on City-owned facilities, where those activities have the potential to affect discharges to the City’s MS4.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Require contractors to comply with stormwater controls and the City’s SWMP.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop procedures to oversee contractors are complying with the City’s stormwater controls and SWMP requirements.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Perform an assessment of municipal operations and maintenance activities; identify pollutants of concern.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop policies and procedures to implement stormwater BMPs as deemed necessary in the municipal operations assessment.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop written procedures describing the frequency and steps for performing visual inspections.</li> </ul>	
<ul style="list-style-type: none"> <li>• Perform visual inspections of pollution prevention measures at City-owned facilities.</li> </ul>		



5	<ul style="list-style-type: none"> <li>• Develop and implement a maintenance program for structural controls.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>• Review and modify current operations and procedures to reduce pollutants to the maximum extent practicable.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Identify problem areas for increased inspection.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Track maintenance activities.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Review and modify current operations and procedures for street sweeping program to include sweeping frequency, schedule, and waste disposal.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Document street sweeping operations.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Update map of the City’s MS4 regulated area that identifies permittee-owned and operated facilities.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Assess City-owned facilities for potential to discharge pollutants; Identify high priority facilities.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Update SOPs for “high priority” facilities.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Identify and implement stormwater controls and BMPs for each facility.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Review, update, and implement a facility inspection program.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Review, update, and implement inspection procedures and checklists.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Perform inspections on all high priority City-owned facilities.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Evaluation of materials used and landscape activities performed at City-operated public spaces.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Educate staff and contractors on pesticide, fertilizer, and herbicide applications and proper management techniques.</li> </ul>	
<ul style="list-style-type: none"> <li>• Develop chemical application schedules to minimize runoff.</li> </ul>		
<ul style="list-style-type: none"> <li>• Properly dispose of unused pesticide, herbicide, and fertilizers along with containers.</li> </ul>		

5	<ul style="list-style-type: none"> <li>• Inventory all City-owned flood control structures and assess/evaluate their potential to minimize impacts to receiving waters.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>• Develop design, construction, and maintenance criteria for future City-owned flood control structure projects.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Implement design, construction, and maintenance criteria for new City-owned flood control projects; Document retrofitting/non-structural control activities on existing City-owned flood control structures.</li> </ul>	
6	<ul style="list-style-type: none"> <li>• Identify all regulated entities within the City’s MS4 regulated area.</li> </ul>	Met Goal
	<ul style="list-style-type: none"> <li>• Develop and distribute educational material regarding Industrial Stormwater Sources Inspection Program.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Develop inspection procedures for Industrial Stormwater Sources Inspection Program.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Inspect all private facilities that require compliance with the TPDES TXR050000 MSGP that lie within the City’s regulated MS4 area.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Ensure compliance and maintenance at all City-owned facilities that are permitted under the TPDES TXR050000 MSGP.</li> </ul>	