

March 28, 2022

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

Re: Phase II MS4 Annual Report Transmittal for  
The City of Stafford  
TPDES Authorization: **TXR040252**

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 TXR040252 for The City of Stafford.

The annual report is for Year 3 - 01/01/2021-12/31/2021

A separate Notice of Change has not been submitted based on the fact that changes have not been proposed for the next permit year.

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,

Justin Klump  
Municipal Consultant

# Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

## A. General Information

Authorization Number: **TXR040252**

Reporting Year:   3  

Annual Reporting Year Option Selected by MS4:

Calendar Year:   X  

Permit Year:   N/A  

Fiscal Year:   N/A   Last day of fiscal year: (  N/A  )

Reporting period beginning date: (month/date/year)   01/01/2021  

Reporting period end date: (month/date/year)   12/31/2021  

MS4 Operator Level:   2  

Name of MS4: The City of Stafford

Contact Name:   Justin Klump   Telephone Number:   281.587.5950  

Mailing Address:   16110 Hollister Street, Houston, TX 77066  

E-mail Address:                           JTKlump@swstx.com                          

A copy of the annual report was submitted to the TCEQ Region YES   X   NO       

Region the annual report was submitted to: TCEQ Region   12

## B. Status of Compliance with the MS4 GP and SWMP

1. Provide information on the status of complying with permit conditions:  
(TXR040000 Part IV.B.2)

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		SWMP submitted by deadline and has provisional coverage until final approval.
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		Year 2 annual report has been submitted.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X		SWMP and previous annual report have been submitted. No outstanding deficiencies.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X		SWMP was reviewed per the TXR040000 instructions.

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement (**see Example 1 in instructions**):

MCM(s)	BMP	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
1	Cast Grate and Manhole	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has included the storm drain cast grate design in the City’s Design Standards. The manhole is designed with the phrase “No Dumping – Drains to Waterways” in both English and Spanish.</p>
1	Education Materials For Residents and Visitors	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has continued their partnership with the Regional Watershed Protection Program (RWPP) implementing this objective in year 3. Throughout the year, the program includes billboards, newspaper ads, and other educational development. During year 3 the City spent \$9,377.29 on this program.</p>
1	Education Materials for Businesses	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has continued their partnership with the Regional Watershed Protection Program (RWPP). Throughout the year, the program includes billboards, newspaper ads, and other educational development. The RWPP website, <a href="http://www.cleanwaterways.org">www.cleanwaterways.org</a>, includes information that educates industries on their environmental responsibilities as it pertains to storm water. Information regarding the TXR040000 and SWMP is available as well.</p>
1	Stafford Municipal Educational Television	<p style="text-align: center;"><b>Yes.</b></p> <p>Last permit term, the City selected <i>After the Storm</i> as the most appropriate program for storm water education. The City aired the program 63 times during year 3.</p>
1	City of Stafford Website	<p style="text-align: center;"><b>Yes.</b></p> <p>The City decided that the RWPP site and <a href="http://www.cleanwaterways.org">www.cleanwaterways.org</a>, are the most informative sites regarding stormwater education &amp; outreach. The City has a link to the RWPP site on its site, <a href="http://www.StaffordTX.gov">www.StaffordTX.gov</a>. The website also includes information relative to the TXR040000 and the SWMP. Additional Information was added to <a href="http://www.cleanbayous.org">www.cleanbayous.org</a>. The SWMP &amp; NOI can be found at this website as well.</p>

1	Student Education	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has continued their partnership with the RWPP. Throughout the year, the program includes billboards, newspaper ads, and other educational development. The City spent \$9,377.29 on this program during year 3. The RWPP website, <a href="http://www.cleanwaterways.org">www.cleanwaterways.org</a>, includes information that educates kids with games and school programs. The website also includes information relative to the TXR040000 and the SWMP.</p>
1, 3	Construction Site Operator Education	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has continued their partnership with the RWPP. Throughout the year, the program includes billboards, newspaper ads, and other educational development. The program also included education for construction site operators. In addition to the RWPP education, the City had education available to all construction site operators who were active in their City.</p>
1	Public Notice and Public Meeting Requirements	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has no events regarding the storm water program required public notice or a public meeting.</p>
1	Storm Drain Markers	<p style="text-align: center;"><b>Yes.</b></p> <p>The City continued its maintenance/installation of inlet markers and approximately 43 were installed during year 3.</p>
1,2	Annual Citywide Spring Clean-Up Event	<p style="text-align: center;"><b>Yes.</b></p> <p>The City cancelled its Annual Citywide Spring Clean-Up Event due to COVID-19 restrictions.</p>
1,2	Pet Waste Management at City Parks	<p style="text-align: center;"><b>Yes.</b></p> <p>The City maintained the five pet waste stations at the City's parks. The City has evaluated the stations to be very effective in limiting the amount of pet waste left in the park.</p>
1,2	Storm Water Pollution Hotline	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has a list of questions for the hotline operator to ask when a resident reports an illicit discharge. During year 3, no illicit discharge complaints were received from the residents. The City continues to publicize the hot line on its website.</p>
2	Illicit Discharge and Elimination Ordinance	<p style="text-align: center;"><b>Yes.</b></p> <p>The Illicit Discharge and Elimination Ordinance was passed by the City Council in April, 2011 and is currently in effect.</p>

2	Illicit Discharge and Elimination Program	<b>Yes.</b> The IDDE Program is governed by the Illicit Discharge and Elimination Ordinance passed by the City Council in April, 2011 and is currently in effect.
2	Storm Sewer System Mapping	<b>Yes.</b> The City continues makes updates to its storm sewer map, as necessary.
1, 2	Recycling Program for Household Hazardous Waste	<b>Yes.</b> The City promoted the services of the Fort Bend County recycling center on its website.
2	Update Business Database	<b>Yes.</b> The City continuously updates its business database.
2	Septic Tank Systems	<b>Yes.</b> There is an existing ordinance banning new septic systems to be constructed. The City continues to monitor for any excursions into surface water.
3	Erosion and Sediment Control Ordinance	<b>Yes.</b> The City has an Erosion and Sediment Control Ordinance. This ordinance will be revised when necessary.
2, 3	Construction Site Waste Control Ordinance	<b>Yes.</b> The City has a Construction Site waste Control Ordinance. This ordinance will be revised when necessary.
3	Construction Site Operator Education	<b>Yes.</b> The City implements a pre-construction meeting process. A checklist is provided to all contractors looking to do business within the City. The checklist has six items including NOI submittal and SWPPP development. This checklist will be revised when necessary.
3	Construction Plan Review Process	<b>Yes.</b> The City currently requires contractors to submit a SWPPP and any other required TCEQ permit forms when applying for new building permit application. This process will be reviewed and revised when necessary.

3	Site Inspection and Enforcement	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has an Erosion and Sediment Control Ordinance and a Construction Site Waste Ordinance. The City inspects construction sites within its jurisdiction as it deems necessary. This ordinance will be revised when necessary.</p>
2, 4	Post-Construction Runoff Control Ordinance	<p style="text-align: center;"><b>Yes.</b></p> <p>The City enforces a Post-Construction Runoff Control Ordinance. This ordinance will be revised when necessary.</p>
4	Review/Revise Development Guidelines and Plan Review Procedures	<p style="text-align: center;"><b>Yes.</b></p> <p>The City engineer, the main reviewer of the all construction plans, has been educated on storm water issues. The City enforces the ordinance and has in place a long-term inspection and maintenance program.</p>
4	Inspection of Completed Projects	<p style="text-align: center;"><b>Yes.</b></p> <p>The City has an Erosion and Sediment Control Ordinance and the Construction Site Waste Ordinance. The City inspects construction sites within its jurisdiction as it deems necessary. This ordinance will be revised when necessary.</p>
2, 4	Long-Term Operation and Maintenance Program	<p style="text-align: center;"><b>Yes.</b></p> <p>The City continues to maintain a database of storm water structural controls installed throughout the City.</p>
2, 4	Evaluate Regional Storm Water Systems	<p style="text-align: center;"><b>Yes.</b></p> <p>The regional stormwater system has been evaluated by the City of Stafford. The necessity of any improvements will be addressed on an as-needed basis.</p>
2, 5	Good Housekeeping Operations	<p style="text-align: center;"><b>Yes.</b></p> <p>The City of Stafford revisited the previously completed inspection of City operation. It was determined that no improvements were required. The City will continue to evaluate its facility for on-site stormwater quality management.</p>
2, 5	City Storm Water System Maintenance	<p style="text-align: center;"><b>Yes.</b></p> <p>The City maintains the inventory of all of the drainage facilities (pump stations, detention ponds, drainage ditches).</p>

2, 5	Pesticides/Herbicide Applicator and Hazardous Material Training	<b>Yes.</b> Any contractor applying pesticide/herbicide in the city must be licensed to do so.
2, 5	Spill Response Kits	<b>Yes.</b> No new kits were required in year 3 of the new permit term.
2, 5	Street Sweeping	<b>Yes.</b> It has been determined that the current street sweeping program is effective at minimizing pollutant runoff into surrounding bodies of water. The City swept approximately 408 miles of roadway per quarter in year 3.
5	Wash Racks	<b>Yes.</b> A quarterly inspection program is in place regarding the City's wash racks. All deficiencies are noted and corrected.
2, 5	Litter Control	<b>Yes.</b> The City currently performs litter control during their mowing activities. The City also maintains all of the public parks and keeps them free of trash and debris that could find its way to stormwater conveyance system. It has been determined that no changes are needed to the litter control program.
5	Employee Training	<b>Yes.</b> Training sessions are directed at City employees and are relative to the implementation of the Stormwater management Program.

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 in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)</b>
1,2	Distribute Education Material	Website	N/A	Uploading Educational Material	No. Though this BMP does not result in a direct reduction of pollutants, however, educating the citizens will eventually reduce litter/pollutants.
1,2,3	Stormwater Reporting by the Public	Website, phone line	0	Utilizing Reporting Mechanisms	Yes. When residents observe an illicit discharge and use the website's reporting mechanism, it reduces the amount the pollutant that would have been otherwise unaddressed.
1	Public Involvement Opportunities	Website	0	Events	Yes. Involving the public is a great way for volunteers to help with city-wide cleanups and create a culture that understands the importance of clean waterways.
2,5	Storm Sewer System Map & Facility Inventory	Inventory of facilities	All	Maps/lists	Yes. Knowing the location of facilities and have the capability to track discharges helps to reduce pollutants discharging into our waterways.
2	Illicit Discharge and Spill Inspection, Investigation, and Response	IDDE Program	All	Reports	Yes. Responding to illicit discharges and spills helps to reduce the amount of pollutants that would have otherwise discharges into our waterways.
2	On-Site Sewage Facilities (OSSF) Procedures	Reports	0	Condition of City Facilities	Yes. Proper condition of these facilities is critical for meeting permit standards on a consistent basis.
3,4	Plan Review	Plans	All received by MS4 Operator	Reviews	Yes. Ensuring proper BMPs are on plan sets helps to reduce the pollutants that would otherwise discharge into the local streams without first going through a BMP.

2,3	Construction Site Inspection & Enforcement	Construction Sites	All	Inspections	Yes. Inspections allow for determining if proper BMPs are in place to reduce sediment discharge and erosion.
3	Construction Site Inventory	Construction Sites	All	Inspections	No. Though this BMP does not result in a direct reduction of pollutants, an inventory of construction sites helps to track and manage construction activity in the City.
4	Structural Control Maintenance, Inspection, & Enforcement	Structural Controls	All	Inspections	Yes. Proper maintenance and inspections is imperative to ensure that controls are functioning properly.
5	Maintenance Contractor Oversight	SOPs	All	Training	No. Though this BMP does not result in a direct reduction of pollutants, maintenance contractor oversight helps to ensure adherence to SOPs.
5	Municipal Operations & Maintenance Activity	SOPs	All	Maintenance	Yes. Proper operation of facilities is crucial to the overall function of a City's facilities.
5	Municipal Operations Inspection Program & Procedures	Procedures	All	Inspections	Yes. Visual inspections help to discern the condition and effectiveness of pollution prevention measures and take action accordingly.
5	Disposal of Collected Waste	Title 30 of the Texas Administrative Code Chapters 330 or 335.	All	Waste Manifests	Yes. Proper disposal of collected waste is crucial to environmental health.
2,3,5	Staff Training	SWMP	0	Meetings	No. Though this BMP does not result in a direct reduction of pollutants, educating and training the citizens and City staff will inform both groups how to improve stormwater quality.
2,3,4	Stormwater Quality Ordinances	Ordinance	0	Violations	No. Though this BMP does not result in a direct reduction of pollutants, ordinances are vital tool for cities to use as an arm of enforcement toward regulatory matters.

4. Provide the measurable goals for each of the MCMs, and an evaluation of the success of the implementation of the measurable goals (**see Example 3 in instructions**):

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
1	Cast Grate and Manhole	The City has included the storm drain cast grate design in the City’s Design Standards. The manhole is designed with the phrase “No Dumping – Drains to Waterways” in both English and Spanish.
1	Education Materials For Residents and Visitors	The City has continued their partnership with the Regional Watershed Protection Program (RWPP) implementing this objective in year 3. Throughout the year, the program includes billboards, newspaper ads, and other educational development. During year 3 the City spent \$9,377.29 on this program.
1	Education Materials for Businesses	The City has continued their partnership with the Regional Watershed Protection Program (RWPP). Throughout the year, the program includes billboards, newspaper ads, and other educational development. The RWPP website, <a href="http://www.cleanwaterways.org">www.cleanwaterways.org</a> , includes information that educates industries on their environmental responsibilities as it pertains to storm water. Information regarding the TXR040000 and SWMP is available as well.
1	Stafford Municipal Educational Television	Last permit term, the City selected <i>After the Storm</i> as the most appropriate program for storm water education. The City aired the program 63 times during year 3.
1	City of Stafford Website	The City decided that the RWPP site and <a href="http://www.cleanwaterways.org">www.cleanwaterways.org</a> , are the most informative sites regarding stormwater education & outreach. The City has a link to the RWPP site on its site, <a href="http://www.StaffordTX.gov">www.StaffordTX.gov</a> . The website also includes information relative to the TXR040000 and the SWMP. Additional Information was added to <a href="http://www.cleanbayous.org">www.cleanbayous.org</a> . The SWMP & NOI can be found at this website as well.
1	Student Education	The City has continued their partnership with the RWPP. Throughout the year, the program includes billboards, newspaper ads, and other educational development. The City spent \$9,377.29 on this program during year 3. The RWPP website, <a href="http://www.cleanwaterways.org">www.cleanwaterways.org</a> , includes information that educates kids with games and school programs. The website also includes information relative to the TXR040000 and the SWMP.

1, 3	Construction Site Operator Education	The City has continued their partnership with the RWPP. Throughout the year, the program includes billboards, newspaper ads, and other educational development. The program also included education for construction site operators. In addition to the RWPP education, the City had education available to all construction site operators who were active in their City.
1	Public Notice and Public Meeting Requirements	The City has no events regarding the storm water program required public notice or a public meeting.
1	Storm Drain Markers	The City continued its maintenance/installation of inlet markers and approximately 43 were installed during year 3.
1,2	Annual Citywide Spring Clean-Up Event	The City cancelled its Annual Citywide Spring Clean-Up Event due to COVID-19 restrictions.
1,2	Pet Waste Management at City Parks	The City maintained the five pet waste stations at the City's parks. The City has evaluated the stations to be very effective in limiting the amount of pet waste left in the park.
1,2	Storm Water Pollution Hotline	The City has a list of questions for the hotline operator to ask when a resident reports an illicit discharge. During year 3, no illicit discharge complaints were received from the residents. The City continues to publicize the hot line on its website.
2	Illicit Discharge and Elimination Ordinance	The Illicit Discharge and Elimination Ordinance was passed by the City Council in April, 2011 and is currently in effect.
2	Illicit Discharge and Elimination Program	The IDDE Program is governed by the Illicit Discharge and Elimination Ordinance passed by the City Council in April, 2011 and is currently in effect.
2	Storm Sewer System Mapping	The City continues makes updates to its storm sewer map, as necessary.
1, 2	Recycling Program for Household Hazardous Waste	The City promoted the services of the Fort Bend County recycling center on its website.
2	Update Business Database	The City continuously updates its business database.

2	Septic Tank Systems	There is an existing ordinance banning new septic systems to be constructed. The City continues to monitor for any excursions into surface water.
3	Erosion and Sediment Control Ordinance	The City has an Erosion and Sediment Control Ordinance. This ordinance will be revised when necessary.
2, 3	Construction Site Waste Control Ordinance	The City has a Construction Site waste Control Ordinance. This ordinance will be revised when necessary.
3	Construction Site Operator Education	The City implements a pre-construction meeting process. A checklist is provided to all contractors looking to do business within the City. The checklist has six items including NOI submittal and SWPPP development. This checklist will be revised when necessary.
3	Construction Plan Review Process	The City currently requires contractors to submit a SWPPP and any other required TCEQ permit forms when applying for new building permit application. This process will be reviewed and revised when necessary.
3	Site Inspection and Enforcement	The City has an Erosion and Sediment Control Ordinance and a Construction Site Waste Ordinance. The City inspects construction sites within its jurisdiction as it deems necessary. This ordinance will be revised when necessary.
2, 4	Post-Construction Runoff Control Ordinance	The City enforces a Post-Construction Runoff Control Ordinance. This ordinance will be revised when necessary.
4	Review/Revise Development Guidelines and Plan Review Procedures	The City engineer, the main reviewer of the all construction plans, has been educated on storm water issues. The City enforces the ordinance and has in place a long-term inspection and maintenance program.
4	Inspection of Completed Projects	The City has an Erosion and Sediment Control Ordinance and the Construction Site Waste Ordinance. The City inspects construction sites within its jurisdiction as it deems necessary. This ordinance will be revised when necessary.
2, 4	Long-Term Operation and Maintenance Program	The City continues to maintain a database of storm water structural controls installed throughout the City.
2, 4	Evaluate Regional Storm Water Systems	The regional stormwater system has been evaluated by the City of Stafford. The necessity of any improvements will be addressed on an as-needed basis.

2, 5	Good Housekeeping Operations	The City of Stafford revisited the previously completed inspection of City operation. It was determined that no improvements were required. The City will continue to evaluate its facility for on-site stormwater quality management.
2, 5	City Storm Water System Maintenance	The City maintains the inventory of all of the drainage facilities (pump stations, detention ponds, drainage ditches).
2, 5	Pesticides/Herbicide Applicator and Hazardous Material Training	Any contractor applying pesticide/herbicide in the city must be licensed to do so.
2, 5	Spill Response Kits	No new kits were required in year 3 of the new permit term.
2, 5	Street Sweeping	It has been determined that the current street sweeping program is effective at minimizing pollutant runoff into surrounding bodies of water. The City swept approximately 408 miles of roadway per quarter in year 3.
5	Wash Racks	A quarterly inspection program is in place regarding the City's wash racks. All deficiencies are noted and corrected.
2, 5	Litter Control	The City currently performs litter control during their mowing activities. The City also maintains all of the public parks and keeps them free of trash and debris that could find its way to stormwater conveyance system. It has been determined that no changes are needed to the litter control program.
5	Employee Training	Training sessions are directed at City employees and are relative to the implementation of the Stormwater management Program.

## **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 continued its maintenance/installation of inlet markers and 43 were installed during year 3.
- The City cancelled its Annual Citywide Spring Clean-Up Event due to COVID-19 restrictions.
- The City maintained the five pet waste stations at the City's parks.
- The City kept the storm sewer system map up to date.
- The City promoted the services of the Fort Bend County recycling center on its website.
- There is an existing ordinance banning new septic systems to be constructed.
- The City continues enforcement of the Erosion and Sediment Control Ordinance.
- The City enforced its Erosion and Sediment Control Ordinance and the Construction Site Waste Ordinance.
- The City enforced its Post-Construction Runoff Control Ordinance.
- The City has maintained the inventory of all of the drainage facilities.
- The City has continued with the current street sweeping program.
- The City currently performs litter control during their mowing activities. The City also maintains all of the public parks and keeps them free of trash and debris that could find its way to storm sewer system.

## 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.

The waterbodies receiving discharge within the permitted area were on the previous Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) and remain on the new one.

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.

TMDL documents state the sources for indicator bacteria vary, and there is no single predominant source. Bacteria specific to humans, avian, and non-avian wildlife and domestic animals all accounted for appreciable portions of the loadings. The I-Plan referenced to write the SWMP summarizes information found in the TMDL documents for potential pollution sources. The City has reviewed the potential sources of bacteria as identified in the I-Plan, as well as the strategies proposed to address these potential sources. The I-Plan strategies are intended to be implemented on a watershed basis, however, some of the strategies do not apply within the jurisdiction of the City of Stafford. Goals listed in the SWMP, including those relative to TMDLs, and reported in previous sections of this annual report have been achieved. Furthermore, the following sections will give more detail of the additional BMPs used to address the pollutant of concern.

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

The SWMP goals are consistent with the rules written in the TXR040000, as well as the goals written in the respective TMDL documents. Each BMP mentioned in the SWMP shares an overarching goal of controlling the discharge(s) of the pollutant of concern (bacteria) to impaired waters and waters with an approved TMDL, and is intensive on detecting, addressing, and eliminating the bacteria impairment.

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

<b>Benchmark Parameter (Ex: Total Suspended Solids)</b>	<b>Benchmark Value</b>	<b>Description of additional sampling or other assessment activities</b>	<b>Year(s) conducted</b>
Bacteria	<b>200 Billion MPN/Day 1007C_01</b>	<i>Keegans Bayou</i> - No sampling was performed in year 3.	N/A
Bacteria	<b>120 Billion MPN/Day 1007E_01</b>	<i>Willow Water Hole</i> - No sampling was performed in year 3.	N/A
Bacteria	<b>174 Billion MPN/Day 1007D_01</b>	<i>Sims Bayou Above Tidal</i> - No sampling was performed in year 3.	N/A
Bacteria	<b>699 Billion MPN/Day 1245_01</b>	<i>Oyster Creek (Allocation Reach 1)</i> - No sampling was performed in year 3.	N/A

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	BMP 1.1 Reporting of Sanitary Sewer Overflows (SSOs)	Regular reporting of SSOs provide vital statistics to ensure proper management of these pollution-causing events.
Bacteria	BMP 1.2 Facilities Assessment	Reviewing the conditions of the sanitary sewer system on a periodic basis to determine if problems exist that may lead to non-compliance with effluent conditions is essential in reducing the discharge of bacteria.
Bacteria	BMP 1.3 Sanitary Sewer Use Requirements	Proper use of the sanitary sewer system by all registered customers within the City's jurisdiction is critical for compliance with stream standards. This program element will include a review of existing rules and regulations of the MS4 operator, including subscriber system contracts, as applicable, in order to ensure proper use of the system. Emphasis will be placed on rules that govern the ownership and operations of grease traps, grit traps and the discharge of fats, oils and grease into the sanitary system.

Bacteria	BMP 2.1 Rules and Regulations for Illicit Discharges	Because illicit discharge and dumping can introduce pollutants both directly and indirectly into the waterways, rules and regulation will have to written/updated, as necessary, over the course of the permit term to address these offenses.
Bacteria	BMP 3.1 City Staff Training	In order to better prevent the discharge of pollutants, applicable personnel must be made aware of what is required in the SWMP.
Bacteria	BMP 3.2 Residential/ Public Education	In order to more effectively address stormwater discharge, the public must be educated as to not only the detriments of such, but how to reduce pollutions.
Bacteria	BMP 4.1 Residential/ Public Education – City Signs	City signs are essential in reminding the public not to pollute and what to do should they witness an illicit discharge.

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

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
BMP 1.1 Reporting of Sanitary Sewer Overflows (SSOs)	Follows I Plan recommendations
BMP 1.2 Facilities Assessment	Follows I Plan recommendations
BMP 1.3 Sanitary Sewer Use Requirements	Follows I Plan recommendations
BMP 2.1 Rules and Regulations for Illicit Discharges	Follows I Plan recommendations
BMP 3.1 City Staff Training	Follows I Plan recommendations
BMP 3.2 Residential/ Public Education	Follows I Plan recommendations
BMP 4.1 Residential/ Public Education – City Signs	Follows I Plan recommendations

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

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
Annual Report written and submitted to the TCEQ	As required by the TXR040000 of regulated MS4s.
Educate public relative to the detriment of stormwater pollution.	Public Education, Outreach, and Involvement.
Previous SWMP & NOI accessible to public via cleanbayous.org and City website.	Public Education, Outreach, and Involvement.
Public education added to Cleanbayous.org and City website	Public Education, Outreach, and Involvement.
Conducted training session relative to goals of SWMP, including bacteria specific elements to the applicable personnel	Education is fundamental to continued compliance.
Stormwater conveyance map updated as necessary.	Mapping of the MS4's storm sewer system essential in order to better locate, track, and inventory illicit discharges.
Implemented various ordinances relative to SWMP MCMs	City ordinance allows for clear direction and instruction as to how the MS4 deals with stormwater discharges.
Implemented site inspections and enforcement	Site inspection and enforcement program allows for a proactive approach in ensuring sites in the City's jurisdiction are abiding by the City's requirements as laid out in the TXR040000, SWMP, and City ordinance.
Reporting of Sanitary Sewer Overflows	Reporting such instances allows for transparency, accountability between the cities departments.

## E. Stormwater Activities

Describe activities planned for the next reporting year:

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
1	Cast and Grate Manhole/Storm Drain Markers	Install on all new developments and significant redevelopment projects.	The City will continue with the requirement for installing storm drain grates which includes a message “No dumping, Drains to Waterways” or a similar message.
1	Stafford Website	Update website.	This website specifically targets required groups including residents, visitors, City personnel, businesses, commercial and industrial facilities, and construction site personnel.
1	Stafford Municipal Education Television	<i>Air After the Storm.</i>	The City of Stafford will continue to provide educational material concerning stormwater pollution to the public through the Stafford Municipal Educational Television channel (S-METV Channel 16).
1	General Public Education & Involvement	Update website.	This education effort will continue to recommend methods to the City constituents as to how they can identify and reduce pollution/ illicit discharges.
1	Education and Involvement - City Personnel	Hold 1 training session.	Training sessions will continue to be used to educate these parties relating to the minimum control measures found in the City’s SWMP.
1	Community Involvement	Hold spring clean-up event.	The City currently holds a spring clean-up event on an annual basis.
2	Review & update IDDE Program	IDDE Program will comply with new IDDE provisions of TXR040000.	In an effort to detect and eliminate illicit discharges within the City, the IDDE program will be updated as necessary to comply with the renewed TXR040000.

2	Review and update stormwater conveyance map	Produce an annual updated stormwater conveyance map.	Program updates will include an up-to-date MS4 stormwater conveyance map, training sessions that include procedures for tracing and procedures for removing the source, and procedures to prevent and correct any leaking on-site sewage disposal systems, as applicable.
2	Monitor website for complaints	Respond to 100% of complaints.	City of Stafford will continue responding to resident reports of illegal dumping and/or illicit discharges as part of the existing IDDE program.
2	Training & Education on IDDE Program	Hold 1 training session per year.	The training session will be a scheduled meeting for applicable City Personnel and interested parties.
3	Construction plan review process	City will review all new construction plans for compliance with TXR150000.	The City will continue its construction plan review process, construction site operator education at pre-construction meetings, and periodic site inspections and document any non-compliance issues.
3	Review NOIs for new construction sites	Review of 100% of NOIs received by the City for new construction projects.	The City will 60 days from NOI filing date.
3	Training & Education on Construction Site Stormwater Runoff Control	Hold 1 training session per year.	The training session will be performed during a scheduled meeting for applicable City Personnel and interested parties.
4	Review & update ordinance/develop codes	City ordinance/development codes comply with the new post-construction provisions of TXR040000.	The City will continue to review/update the City's development Codes in order to incorporate post-construction runoff control requirements for new developments or significant re-developments as necessary.
4	Plan review	City will review all new post-construction plans and applications for new construction.	The City will continue to implement its existing program through the plan review process and on-going inspection process.

4	Plan review checklist	City will review checklist and update as necessary.	The City will continue using existing checklist during the plan review process.
4	Inspections	Inspect all post-construction controls.	The City will continue periodic inspections of completed projects to ensure proper maintenance of BMPs.
5	Review & update O & M program	O & M program will comply with the new Municipal Operations provisions of TXR040000.	The existing Operation and Maintenance (O & M) Program will continue to be implemented to prevent or reduce pollutant runoff from municipal operations and municipally-owned areas.
5	Update inventory of City facilities	City will maintain & update an inventory of City facilities for use in implementing good housekeeping measures.	This City maintains inventory of facilities and stormwater controls, procedures for contractor requirements and oversight, and evaluation of municipal operation and maintenance activities.
5	Training & Education on Municipal Operations & Good Housekeeping	Hold 1 training session per year.	The training session will be performed during a scheduled meeting for applicable City Personnel and interested parties.

## F. SWMP Modifications

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

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  No

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

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

**Note:** If changes include additions or substitutions of BMPs, include a written analysis explaining why the original BMP is ineffective or not feasible, and why the replacement BMP is expected to achieve the goals of the original BMP.

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

### 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)
All	N/A	N/A	Additional BMPs not deemed necessary.

### H. Additional Information

1. Is the permittee relying on another entity to satisfy any 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).

- All wastewater within the City is treated by the Fort Bend County W.C. & I.D. No. 2 Wastewater Treatment Facility.
  - W.C. & I.D. no. 2 is entirely responsible for the proper operation and maintenance of this facility.
- The City relies on Harris County to assist in some of its public education efforts.
- TX DOT assists the City in the sweeping of streets and vegetation maintenance.
- The City relies on Fort Bend County Drainage District for maintenance of respective channels and right-of-ways.

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? **N/A**

Yes  No

## I. Construction Activities

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

28

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

Yes  No

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

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

**Note:** Though the seventh MCM is optional, implementation must be requested on the NOI or on a NOC and approved by the TCEQ.

**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): Tatyana Lutteneschlager Title: City Planner

Signature: *Tutteneschlager* Date: 03/24/22

Name of MS4: City of Stafford - TXR040252