

# Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number **TXR040000**

## A. General Information

Authorization Number: TXR040469

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

Annual Reporting Year Option Selected by MS4: Fiscal Year

Calendar Year: n/a

Permit Year: n/a

Fiscal Year: 2023 - 2024 Last day of fiscal year: September 30, 2024

Reporting period beginning date: 10/1/2023

Reporting period end date: 9/30/2024

MS4 Operator Level: Level 3 Name of MS4: City of New Braunfels

Contact Name: Phillip Quast Telephone Number: 830-221-4651

Mailing Address: 424 Castell, New Braunfels, TX 78130

E-mail Address: pquast@newbraunfels.gov

A copy of the annual report was submitted to the TCEQ Region: Yes

Region the annual report was submitted to: TCEQ Region 13

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

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

	<b>Yes</b>	<b>No</b>	<b>Explain</b>
<b>Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.</b>	X		The SWMP intended to comply with the 2019 Small MS4 permit was submitted to TCEQ on June 5, 2019. The SWMP was approved by TCEQ November 17, 2023. City began implementation of Year 1 of the SWMP as submitted and continued

			implementation in Years 2, 3, 4, and 5
<b>Permittee is currently in compliance with recordkeeping and reporting requirements.</b>	X		Yes, digital versions of all MS4 documents are stored on our internally accessible servers and are remotely backed-up as per the City's current IT policies. All documents required for public access, including the approved SWMP, current GCP, and annual reports, are available on the City of New Braunfels website: <a href="http://www.NewBraunfels.gov">www.NewBraunfels.gov</a>
<b>Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).</b>	X		The City of New Braunfels has met all eligibility requirements for the permit: no TMDL requirements, continued participation in EAA regulations and the Edwards Aquifer Habitat Conservation Plan, continued implementation of the Dry Comal Creek and Comal River Watershed Protection Plan, and no additional requirements due to previous permit non-compliance.
<b>Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report</b>	X		An annual review of the approved SWMP was performed in conjunction with the preparation of this annual report to provide continued understanding of the outlined requirements and to provide a training exercise for new staff members.

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**):

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
<b>1: Public Education, Outreach and Involvement</b>	<b>Stormwater Educational Materials and Strategies</b>	Yes, stormwater educational materials aid in developing local awareness of pollution prevention and water quality protection efforts. The City's MS4 Stormwater webpage provides a readily accessible outlet for residents to access stormwater educational materials and information.
<b>1: Public Education, Outreach and Involvement</b>	<b>Initiate Public Participation and Involvement Program</b>	Yes, involving the public in watershed planning and stormwater pollution prevention promotes and encourages public awareness and participation and allows citizens to take ownership of stormwater pollution prevention and watershed management.
<b>1: Public Education, Outreach and Involvement</b>	<b>Partnerships with Other Institutions and Organizations</b>	Yes, collaboration with other organizations helps to increase the public awareness of stormwater pollution prevention and potential water quality issues. Partner organizations aid in educating the public on watershed management initiatives while promoting regional participation in protecting water quality.

<b>1: Public Education, Outreach and Involvement</b>	<b>Presentation to Local Schools and Youth Groups</b>	Yes, it is important that students are informed of water quality issues and stormwater pollution prevention. Increased awareness of stormwater pollution issues and water resource protection will help to improve and protect water quality.
<b>1: Public Education, Outreach and Involvement</b>	<b>Volunteer Programs (PE-2: Watershed Clean-ups; PE-5: Adopt-a-Spot)</b>	Yes, volunteer stream clean-up events and programs promote the importance of maintaining water quality and litter-free waterways/riparian areas. Clean-up events also offer volunteers an opportunity to assist with keeping our waterways clean and allows the opportunity for volunteers to ask questions and learn more about pollution prevention and watershed protection efforts.
<b>1: Public Education, Outreach and Involvement</b>	<b>Community Arbor Day/ Tree City USA Program</b>	Yes, the City of New Braunfels' Arbor Day event aids in educating residents on the importance of trees and their importance in protecting water quality. Attendees are also provided with free trees that are planted throughout local watersheds.
<b>2: Illicit Discharge Detection and Elimination</b>	<b>Storm Sewer Mapping</b>	Yes, the storm drain system map identifies the location of stormwater drainage infrastructure such as drainage inlets, channels, retention basins, and stormwater outfalls. The storm drain system map aids in the implementation of IDDE inspections as well as tracking and identification of potential illicit discharges.

<b>2: Illicit Discharge Detection and Elimination</b>	<b>Detection and Elimination Program</b>	Yes, the City's IDDE program, including dry weather screening, aids in identifying and eliminating illicit discharges. The IDDE program allows for identification and tracking of potential illicit discharges, furthering pollution prevention efforts.
<b>2: Illicit Discharge Detection and Elimination</b>	<b>Field Staff Training</b>	Yes, increasing field staff awareness increases the likelihood of staff to readily detect, eliminate, and respond to illicit discharges.
<b>2: Illicit Discharge Detection and Elimination</b>	<b>Documentation and Reporting of Illicit Discharges and Spills</b>	Yes, the ability to receive water quality concerns the public increases the probability of discovering illicit discharges and speeds up the elimination of the discharge.
<b>2: Illicit Discharge Detection and Elimination</b>	<b>River Clean-up</b>	Yes, regularly scheduled litter collection sessions result in the removal of trash and other pollutants from watershed areas, reducing the amount of litter and debris reaching waterways.
<b>2: Illicit Discharge Detection and Elimination</b>	<b>Waste Collection Events</b>	Yes, by providing an opportunity for residents to dispose of household hazardous waste and bulky items the potential for illegal dumping of these items is reduced.
<b>3: Construction Site Stormwater Runoff Control</b>	<b>Construction Site Inspection Program</b>	Yes, inspection of active construction sites helps identify construction-related pollutant and runoff issues and aids in ensuring that SWPPPs are being implemented and that adequate erosion, sediment and pollution prevention control are in place and functioning, thereby reducing

		the potential for sediment and pollutant discharges from active construction sites.
<b>3: Construction Site Stormwater Runoff Control</b>	<b>Construction Site Inventory</b>	Yes, an inventory of active construction sites aids in guiding, scheduling, and prioritizing routine stormwater construction management inspections aimed at reducing the discharge of pollutants from construction sites.
<b>3: Construction Site Stormwater Runoff Control</b>	<b>Construction Site Waste Control Ordinance</b>	Yes, the City's construction site waste control ordinance allows the City to effectively prohibit the discharge of pollution by holding construction contractors and operators accountable for proper disposal of construction waste materials.
<b>3: Construction Site Stormwater Runoff Control</b>	<b>Construction Site Runoff Control Ordinance</b>	Yes, the City's construction stormwater management ordinance gives the City legal authority to require inspections, SWPPP implementation, and adequate erosion and sediment control measures at active construction sites.
<b>4: Post-Construction Stormwater Mgmt. in New Development</b>	<b>Staff Training on Post-Construction Stormwater Mgmt. Structures</b>	Yes, training increases City staff's knowledge of proper functionality and maintenance of structural stormwater quality controls, increasing the potential for identification of undermaintained or non-functioning permanent stormwater control structures.

<b>4: Post-Construction Stormwater Mgmt. in New Development</b>	<b>Post-Construction Development Review Procedures</b>	<p>Yes, the City's Drainage and Erosion Control Design Manual includes requirements for the installation of stormwater/ water quality controls in areas of new development and redevelopment. The permanent water quality controls result in improved quality of stormwater runoff in areas of new development and redevelopment where new impervious cover is added and there is an increase in the potential of pollutant discharges.</p>
<b>4: Post-Construction Stormwater Mgmt. in New Development</b>	<b>Long-Term Operation and Maintenance</b>	<p>Yes, inspections of water quality controls ensure proper operation and functionality of the controls. The formal inspection program assists in identifying problems associated with the systems and ensures effectiveness of the BMPs.</p>
<b>4: Post-Construction Stormwater Mgmt. in New Development</b>	<b>Post-Construction Stormwater Management Ordinance</b>	<p>Yes, adoption of an ordinance and the City's Drainage and Erosion Control Design Manual effectively requires stormwater controls in areas of new development and redevelopment. The ordinance ensures proper monitoring and maintenance of the controls to ensure operability and effective pollution prevention. The ordinance also provides the ability for the City to hold owners of stormwater controls responsible for upkeep of the controls.</p>
<b>4: Post-Construction Stormwater Mgmt. in New Development</b>	<b>Encouragement of Low-Impact Development (LID) Design</b>	<p>Yes, the City's Low Impact Development Manual includes guidelines for design engineers to use in the development and design of projects. Implementation of LID projects</p>

		will help in cleaning stormwater runoff and will ultimately benefit water quality.
<b>4: Post-Construction Stormwater Mgmt. in New Development</b>	<b>Establishment of Riparian Zones</b>	Yes, healthy riparian zones help to stabilize streambanks, minimize erosion, and filter/ remove potential pollutants from stormwater runoff.
<b>5: Pollution Prevention and Good Housekeeping for Municipal Operations</b>	<b>Street Sweeping</b>	Yes, the City's street sweeping program results in the direct removal of sediment, debris, and vehicle-related heavy metals that otherwise have the potential to be mobilized and transported in stormwater runoff. The prioritization of street sweeping locations allows for efficiency in removing potential pollutants.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Mapping of Facilities and Inventory Control</b>	Yes, a map of city-owned facilities aids in identifying the location of these facilities and their proximity to surface waters and stormwater conveyances, allowing city staff to prioritize inspections and identify those having increased potential to discharge pollutants to surface waters.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Municipal Operations and Facility Survey</b>	Yes, facility surveys provide accurate information regarding operations conducted, materials stored, and the potential for pollutant discharges at each City facility. Surveys allow the City to evaluate and implement stormwater BMPs as appropriate.

<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Facility Inspection Program</b>	Yes, routine inspections of City-owned facilities allow City staff to identify stormwater control measures that may be required to prevent pollutant discharges. All facilities identified as "high priority" areas store chemicals or are immediately adjacent to waterways. This distinction allows for efficiency in minimizing pollutant discharge.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Outdoor Storage</b>	Yes, identification and assessment of outdoor storage facilities ensures that materials are stored in a manner that prevents pollutant releases. A complete inventory allows the City to assess storage adequacy and develop protection measures.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Fleet and Equipment Maintenance</b>	Yes, routine inspection of the fleet maintenance facility ensures that good housekeeping, spill prevention, and protection measures are being implemented.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Vehicle and Equipment Washing</b>	Yes, routine assessment of vehicle and equipment washing operations ensures that good housekeeping, spill prevention, and protection measures are being implemented.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Landscaping</b>	Yes, good landscaping practices and employee training minimize the potential for pesticides, herbicides, fertilizer, and lawn trimmings to enter the City's storm drain system and/ or surface waters. The proper use and storage of landscaping materials also minimizes the potential for pesticides,

		herbicides, and fertilizers to be entrained in stormwater runoff.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Structural Control Maintenance</b>	Yes, the updated inventory and on-going inspections of City-owned structural stormwater controls aids in the identification of controls requiring maintenance and allows for effectively minimizing pollutants in our stormwater.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Spill Prevention and Response</b>	Yes, readily available spill kits and trained staff ensure that spills are quickly cleaned thus minimizing the potential for discharges to surface waters and the storm drain system.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Employee Training Program</b>	Yes, the increased awareness of water quality issues and pollution prevention by City employees ensures that stormwater quality programs are properly implemented and BMPs are maintained.
<b>5: Pollution Prevention &amp; Good Housekeeping for Municipal Operations</b>	<b>Green Waste Management</b>	Yes, the green waste recycling program provides an avenue for residents to properly dispose of lawn clipping and other green waste and helps to keep these materials from entering the storm drain system and surface waters.

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**):

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1	<b>Volunteer Litter Clean-Ups Events and Programs (PE-5)</b>	<b>Volume of litter collected by volunteers through Dos Rios Watershed Clean-Up and Adopt-A-Spot Programs</b>	2050	Pounds	Yes, a total of 2050 lbs. of litter was removed from and adjacent to local creeks and rivers, directly reducing the amount of litter pollution.
2	<b>Dry Weather Screening-Illicit Discharge Detection and Elimination Program (ID-2)</b>	<b>Screening of stormwater outfalls</b>	84	# of inspections	Yes, by routinely screening stormwater outfalls, illicit discharges can be readily identified, and action taken to eliminate the pollutant discharge to the City's MS4 and surface waters.
2	<b>River Litter Clean-Up (ID-6)</b>	<b>Litter collection from banks of Guadalupe</b>	2,609 lbs.	Pounds of litter collected	Yes, the City utilizes a contractor to remove litter

		<b>and Comal Rivers and underwater SCUBA litter removal in Comal River utilizing contractor</b>			from the banks of the Comal and Guadalupe Rivers, remove litter from the Comal River using SCUBA and provide and empty trash receptacles at key locations along the river. Results in keeping significant volumes of litter from waterways.
<b>3</b>	<b>Construction Site Inspection Program (CS-1)</b>	<b>Inspections of active construction sites</b>	1,487	# of inspections	Yes, the routine inspection of active construction sites helps to ensure that adequate sediment, erosion, and pollution prevention measures are in place thereby minimizing pollutant discharges to MS4 and surface waters.
<b>4</b>	<b>Post-Construction Stormwater Management (PC-2)</b>	<b>Stormwater/water quality treatment infrastructure required for new developments</b>	7	# of stormwater/water quality treatment facilities required to be installed as part	Yes, the required stormwater/water quality treatment facilities will help to mitigate the

		<b>adding &gt;5,000 ft<sup>2</sup> of impervious cover</b>		of new developments permitted by the City in Year 5	impacts of increased impervious cover.
5	<b>Street Sweeping (GH-1)</b>	<b>Weight of sediment and debris collected from City streets as part of street sweeping program</b>	1269 tons 1485 hours	Tons; hours	Yes, sediment, road debris, auto debris and other materials swept from streets and roadways directly reduces the amount of material available to be carried to the City's MS4 and surface waters via stormwater runoff.

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	Update City Website and media outlets (PE-1)	Met goal. The City continued to display and maintain an MS4 Stormwater Program webpage ( <a href="http://www.newbraunfels.gov/ms4">www.newbraunfels.gov/ms4</a> ) on the City's Watershed Management Division website ( <a href="http://www.newbraunfels.gov/watershed">www.newbraunfels.gov/watershed</a> ). The page includes information on the City's MS4

		program, links to the City's Storm Water Management Program (SWMP), links to completed MS4 Annual Reports and a link to the City's Stormwater fact sheet. The webpage also includes information on the City's annual watershed clean-up event, the Dos Rios Watershed Clean-Up ( <a href="http://www.newbraunfels.gov/dosrrios">www.newbraunfels.gov/dosrrios</a> ) and the City's Adopt-A-Spot River Clean-Up Program ( <a href="http://www.newbraunfels.gov/adoptaspot">www.newbraunfels.gov/adoptaspot</a> ).
1	Distribute a stormwater fact sheet (PE-1)	Met goal. A stormwater fact sheet was developed in Year 1 of the 2014 – 2019 permit. The fact sheet was reviewed and updated in Year 5 of the 2020 - 2024 permit. The fact sheet remains posted on the City's Watershed Management webpage for access by the general public.
1	Distribute stormwater brochures (PE-1)	Met goal. A stormwater brochure was developed in Year 1 of the 2014 – 2019 permit. The fact sheet was reviewed and updated in Year 5 of the 2020 - 2024 permit. Stormwater brochures were distributed at City events and at City Parks Dept. office.
1	Events and meetings for Public Participation and Involvement (PE-2)	Did not meet goal. The City hosted 1 Watershed Advisory Committee (WAC) meeting in Year 5.
1	Record and document WQ pollution and illegal dumping incidents reported by citizens (PE-2)	Met goal. 12 water quality concerns were received by citizens in Year 5. Each of these concerns were

		inspected, documented, and followed-up on.
1	<p>Sponsor, co-sponsor, or participate in annual stream clean-up events (PE-2)</p>	<p>Met goal.</p> <p>The City hosted the 7<sup>th</sup> Annual Dos Rios Watershed Clean-up in October 14<sup>th</sup>, 2023. The 7<sup>th</sup> Annual Dos Rios Watershed Clean-up was set with the Headwaters at the Comal as the headquarters for the event. Participants arrived at the Headwaters and checked in with event staff to receive their cleanup location. Volunteers then collected their event t-shirt, breakfast, and cleanup supplies. Once the volunteers were assigned a location, they then travelled to the locations to collect. Once the volunteers finished picking up litter, they brought their full bags back to the Headwaters at the Comal or to a designated location at the cleanup location. 280 volunteers collected approximately 1200lbs. of trash during the event.</p> <p>The City co-sponsored the 11<sup>th</sup> Annual Geronimo and Alligator Creek Clean-Up April 20<sup>th</sup>, 2024.</p>
1	<p>Collaborate with watershed-based organizations (PE-3)</p>	<p>Met goal.</p> <p>The City continued to work with watershed-based organizations throughout Year 5. The City continued participation with the Alligator Geronimo Creek Watershed Partnership, Edwards Aquifer Habitat Conservation Plan program and continued to work</p>

		<p>closely with the Guadalupe Blanco River Authority.</p> <p>The City regularly met with MS4 Stormwater management staff from the City of San Marcos and Texas State University (known as the Central Texas Stormwater Coalition). Meetings were held every other week to discuss MS4 program efforts, share experiences and provide support to improve each entity's MS4 program.</p>
1	<p>Perform watershed and stormwater educational presentations to local schools and youth groups. (PE-4)</p>	<p>Met goal.</p> <p>City staff was able to present stormwater information to local school children during Year 5. City staff was able to present to two groups of students at the New Braunfels Christian Ministries Summer Program. City staff provided an introduction to the MS4 program and nonpoint source pollution.</p>
1	<p>Coordinate the activities for a volunteer clean-up events (PE-5)</p>	<p>Met goal.</p> <p>The City co-sponsored 11<sup>th</sup> Annual Geronimo and Alligator Creek Clean-Up April 20<sup>nd</sup>, 2024.</p> <p>The City hosted the 7<sup>th</sup> Annual Dos Rios Watershed Clean-up in October 14<sup>th</sup>, 2023. The 7<sup>th</sup> Annual Dos Rios Watershed Clean-up was set with the Headwaters at the Comal as the headquarters for the event. Participants arrived at the Headwaters and checked in with event staff to receive their cleanup location. Volunteers then collected their event t-shirt, breakfast, and cleanup supplies. Once the volunteers were</p>

		<p>assigned a location, they then travelled to the locations to collect. Once the volunteers finished picking up litter, they brought their full bags back to the Headwaters at the Comal or to a designated location at the cleanup location. 280 volunteers collected approximately 1200lbs. of trash during the event.</p> <p>The City continued its Adopt-a-Spot program that allows residents, civic groups and local businesses to get involved with quarterly clean-ups in City parks, along creeks/ rivers and in other greenspaces throughout the City. Four groups have adopted a location and performed at least one clean-up event. Volunteers collected approximately 150 lbs. of litter as part of the program in Year 5.</p>
1	Annually sponsor an Arbor Day/ reforestation event. (PE-6)	Met goal. The City's annual Arbor Day event was held on April 27, 2024 at Landa Park. 230 trees were distributed to attendees at this event.
2	Develop MS4 Outfall Map (ID-1)	Met goal. A comprehensive MS4 system map was completed in Year 2 of the 2014 - 2019 permit cycle and has been continuously updated with new stormwater infrastructure up to the current permit year. The map includes stormwater outfalls, drainage channels, retention ponds, and

		drainage inlets within City limits. All collected field data is updated to the City's GIS server and is included in a GIS map. The map is used to guide IDDE Dry Weather Screening program inspections/ investigations as well as post-construction BMP inspections.
2	Perform dry weather screening to detect potential illicit discharges (ID-2)	Met goal. The dry weather screening program was implemented in Year 5. 84 storm drain outfalls were screened during dry weather conditions during Year 5. This is 100% of the total number of outfalls in the City that discharge to surface waters. The outfalls screened included significant outfalls that discharge directly to surface waters as well as small outfalls that discharge to drainage channels. City staff has an established SOP that guides the dry weather screening program.
2	Provide illicit discharge detection training to City staff. Report names of and number of attendees. Document training materials (ID-3)	Did not meet goal. One (1) training session attended by 7 city staff was conducted the Texas Regional Stormwater Conference (CTSC). Future training will be implemented to help reach the MS4s goals next permit year.
2	Documentation and reporting methods for illicit discharges, spills, and water quality complaints. (ID-4)	Met goal. An on-line water quality and spill reporting form has been developed and is included on the City's Watershed Management website ( <a href="http://www.newbraufels.gov/watershed">www.newbraufels.gov/watershed</a> ).

		<p>An SOP has also been developed for handling water quality concerns that are called into the City, including documentation of any report and corrective action. The City received 12 concerns from residents during Year 5. All concerns that were received were investigated.</p>
2	Implement illicit discharge ordinance (ID-5)	<p>Met goal.</p> <p>An illicit discharge ordinance has been enacted and adopted into the City's Code of Ordinances (Section 143-6). The ordinance remains effective, and it is posted on the City's Code of Ordinance website.</p> <p>The illicit discharge ordinance was implemented in Year 5. No Notice of Violations were issued in Year 5. All identified illicit discharges were eliminated by responsible parties upon initial notification by the City and prior to the need for further enforcement.</p>
2	Record and report on trash collection operations and river clean-ups (ID-6)	<p>Met goal.</p> <p>The City continues to uphold two contracts for litter clean-up activities within the City. The first contract includes litter clean-up activities at four City parks located along the Guadalupe and Comal rivers (Landa Park, Hinman Island Park, River Acres Park, and Prince Solms Park) between February and September of each year. The second contract involves weekly litter collection within and along the banks of the Comal and Guadalupe Rivers within City limits between March and October. 408 litter clean-ups were conducted</p>

		that were associated with these contracts. 2,609 lbs. of litter were collected as part of the contracted work.
2	Waste Collections Events (ID-7)	<p>Met Goal.</p> <p>7 Waste Collections events were held during Year 5: Three (3) Household Hazardous Waste Collection events and four (4) Bulky Item Collection events.</p> <p>Household Hazardous Waste collection events:</p> <ul style="list-style-type: none"> <li>• October 21, 2023, February 10, 2024, and May 18, 2024</li> <li>• Collected 43 tons of hazardous waste during Year 5 at these events.</li> </ul> <p>Bulky Item Collection events:</p> <ul style="list-style-type: none"> <li>• December 19, 2023, March 23, 2024, June 8, 2024, September 14, 2024</li> <li>• Collected 118 tons of refuse during Year 5 at these events.</li> </ul>
3	Develop construction site inspection procedures and forms (CS-1)	<p>Met goal.</p> <p>The City has an established SOP that guides construction stormwater management inspections. A standardized field inspection report is utilized to record inspection findings. All inspection records are retained in dedicated MS4 management software.</p>
3	Perform construction stormwater management inspections at active construction site (CS-1)	<p>Met goal.</p> <p>City staff conducted routine stormwater management inspections at active construction</p>

		sites >1 acre throughout Year 5. 1487 construction stormwater inspections were conducted between Oct 1 <sup>st</sup> , 2023 and Sept 30 <sup>th</sup> , 2024.
3	Provide annual training to applicable City employees (CS-1)	<p>Met goal.</p> <p>Construction SWM training was provided to City staff during Year 5.</p> <p>During Year 5, two (2) watershed management division employee renewed their certification for the Certified Inspector of Sedimentation and Erosion Control (CISEC; cisecinc.org) program.</p>
3	Enforcement Proceedings Documentation (CS-1)	No construction stormwater-related Notices of Violation were issued in Year 5. The City was able to utilize enforcement provisions in the City's construction stormwater ordinance/ Code Section 143-7 to ensure that construction contractors and operators achieved compliance when deficiencies were noted. These enforcement provisions include the withholding of pertinent construction/ engineering inspections and issuance of Stop Work orders that were applied to contractors, as needed, to achieve compliance.
3	Compile, document, and report construction site inventory. Report number of construction	<p>Met goal.</p> <p>City staff continues to document and track all construction sites &lt;1 acre.</p>

	stormwater permits and NOIs (CS-2)	Permit records from the City's Engineering and Building Departments are used, along with submitted NOIs & CSNs, to identify and document active construction projects. Active sites are also identified and documented during routine field visits. All active construction sites >1 acre are tracked in software that maintains a construction site inventory that is used to guide, schedule and document routine inspections. While the number of active sites fluctuates through the year, the number of active construction sites at the end of Year 5 was 148.
3	Develop and document procedures for tracking and documenting construction site inventory (CS-2)	Met goal. Procedures for receiving, documenting, and tracking active construction projects have been developed. This includes documenting all construction sites on a master spreadsheet where City Staff records permit number, permit holder, contact information and other pertinent site information.
3	Develop and adopt construction site waste control ordinance. (CS-3)	Met goal. A construction waste ordinance was developed in Year 2 of the 2014 - 2019 permit cycle. The ordinance (No. 2016-74) was approved by the City Council on December 12 <sup>th</sup> , 2016 and adopted to the City's Code of Ordinances (Section 143-7). The ordinance remained in effect and unchanged in Year 5.

3	Develop and adopt construction site runoff control ordinance. (CS-4)	<p>Met goal.</p> <p>A construction site runoff control ordinance was developed in Year 2 of the 2014 - 2019 permit cycle, approved by City Council in Year 3 of the 2014 - 2019 permit cycle (on December 12<sup>th</sup>, 2016) and adopted to the City's Code of Ordinances (Section 143-7). The construction site runoff control ordinance remained in effect and unchanged in Year 5.</p> <p>No Notice of Violation citations were issued in Year 5. All identified construction stormwater management issues were corrected by responsible parties upon notification by the City and prior to the need for further enforcement.</p>
4	Staff Training on Post-Construction Stormwater Controls (PC-1)	<p>Met goal.</p> <p>Post-construction SWM training was provided to City staff during Year 5.</p> <p>During Year 5, two (2) watershed management division employees renewed the certification for the Certified Inspector of Sedimentation and Erosion Control (CISEC; cisecinc.org) program.</p>
4	Review and revise water quality protection measures as part of the City's Drainage Criteria Manual (DCM). Implement revised DCM (PC-2)	<p>Met goal.</p> <p>The City's Drainage and Erosion Control Design Manual (DCM) was finalized and adopted in Year 2 of the 2014 - 2019 permit cycle. The new DCM became effective on July 1, 2016. The DCM includes water quality control requirements for areas of new development.</p>

	<p>The water quality control requirements took effect on January 1, 2017, requiring that any new Type 3 development (adding &gt;5,000 sq. ft of new impervious cover) platted after the effective date implement permanent water quality controls to treat the first ½" of stormwater runoff from the added impervious cover. The DCM and water quality requirements remained in effect in Permit Year 5.</p> <p>Effective October 27, 2020 all new floodplain permits and City capital improvement projects submitted for new application after the effective date are required to adhere to Atlas 14 rainfall data. These changes are required for all floodplain models and designs within the floodplain as required by the Federal Emergency Management Agency as the data is represented as the most current and best available hydrology information. The new rainfall data is recommended in new development designs and proposed to be adopted revisions to the Drainage and Erosion Control Manual.</p> <p>50 stormwater/ water quality treatment facilities were required to be installed as part of new developments permitted by the City in Year 5.</p>
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4	Develop and implement program to inspect post-construction control measures/ BMPs (PC-3)	<p>Met goal.</p> <p>Inspections of post-construction controls continued to occur throughout Year 5.</p> <p>Standard Operating Procedures were developed for post-construction BMP inspections. A master list of permanent stormwater controls, a corresponding GIS map and a field report have been developed to guide inspections. 267 post-construction BMP inspections were performed in Year 5. 93% of the documented permanent stormwater controls were inspected in Year 5.</p> <p>Notification was sent to owners of stormwater controls that are found to be undermaintained and/or deficient.</p>
4	Develop Post-Construction Stormwater Management Ordinance. Adopt, post, and implement ordinance (PC-4)	<p>Met goal.</p> <p>A post-construction stormwater management ordinance was developed in Year 2 of the 2014 - 2019 permit cycle, approved by City Council in Year 3 of the 2014 - 2019 permit cycle (on December 12<sup>th</sup>, 2016) and adopted to the City's Code of Ordinances (Section 143-8). The ordinance remained in effect and unchanged in Year 5.</p> <p>The adopted ordinance requires inspection and maintenance of permanent stormwater controls which allows City Staff to hold owners accountable for maintenance of post-construction controls. There were no ordinance violations in Year 5. No notices were issued to owners of permanent stormwater controls requiring maintenance. All previous maintenance issues were corrected in a timely manner upon notification by the City and prior</p>

		to the need for further enforcement.
4	Review and revise existing Low Impact Development (LID) stormwater design guidelines. Include LID guidelines as part of the City's Drainage Criteria Manual (DCM) (PC-5)	<p>Met goal.</p> <p>A LID Manual was completed as a supplement to the DCM. The LID Manual provides guidelines and LID features developers may incorporate into their projects. The LID Manual was adopted on April 11, 2016.</p> <p>The City developed a Water Quality Protection Plan (WQPP) in 2017 as part of the Edwards Aquifer Habitat Conservation Plan (EAHCP). The WQPP includes an analysis of potential LID projects that can be implemented by the City within the Comal River watershed in future years as part of the EAHCP. Funding was secured in 2020 through the EAHCP to perform engineering design for LID projects for future implementation. These projects include a bioretention bed located within the well yard at the Headwaters at the Comal facility (completed in Year 2), bioretention bed included in Elizabeth Ave. realignment, a redesign of the Landa Park Aquatic Complex parking lot that will include bioretention beds within the lot (completed in Year 4), and a bioretention bed on golf course road (to be completed in 2025).</p>
4	Evaluate need for establishment of additional riparian zone establishment in flood zones. Implement policies for establishing riparian zones (PC-6)	<p>Met goal.</p> <p>The City maintains riparian buffers (no mow-zones) along specific portions of the Comal River, Dry Comal Creek, and Guadalupe River on City-owned properties (i.e. City parks and flood properties).</p>

		<p>New riparian buffer areas were established in Year 4 within Landa Park along Landa Lake. Existing no-mow zones were continued to be maintained as buffer areas in Year 5.</p>
5	<p>Implement street sweeper waste disposal program (GH-1)</p>	<p>Met goal.</p> <p>The City's street sweeping program consists of the following: The City owns and operates three regenerative-air street sweeping units. Priority street sweeping areas have been delineated. The priority streets are those that are located immediately adjacent to surface waters, areas where stormwater runoff drains rapidly to surface waters, or in areas where sediment and debris are known to rapidly accumulate. A map of the priority sweeping areas is retained on-file.</p> <p>In Year 5, sediment and debris was swept from City streets as part of the street sweeping program. The City has a contract with Waste Management to haul and dispose of street sweeper waste material. Year 5 sweeper operation hours logged were 1485 hours. Year 5 sweeper collection was 1,269 tons.</p>
5	<p>Develop a map identifying CoNB - owned and operated facilities and stormwater controls (GH-2)</p>	<p>Met goal.</p> <p>A GIS map has been developed to document the locations of all City properties and facilities. A stormwater control map was initially completed in Year 3 of the 2014 - 2019 permit cycle to show City-owned controls. The map and City facilities were reviewed in Year 5 and updated to include Fire Station #7.</p>

5	Perform surveys of municipal facilities and operations. (GH-3)	<p>Met goal.</p> <p>Surveys were conducted at all City facilities including Fire facilities, Police Dept facilities, Parks Dept facilities, Streets &amp; Drainage facilities, and Solid Waste facilities. The surveys, including updates and changes to inventories, have been documented and are retained on-file.</p>
5	Implement facility inspection program. (GH-4)	<p>Met goal.</p> <p>Quarterly inspections were performed throughout Year 5 at 100% of high-risk City facilities. The inspections were conducted at fire stations (7 facilities), police station, solid waste vehicle storage area, parks and recreation department equipment and storage facility, aquatic center chemical storage, and fleet maintenance shop. Any identified issues are followed up on to minimize the potential for pollutant discharges. A total of 46 facility inspections were conducted in Year 5. All inspection reports are retained on file.</p>
5	Compile inventory of outdoor storage locations and materials stored. Perform routine inspections of storage facilities (GH-5)	<p>Met goal.</p> <p>Outdoor storage facilities have been assessed and are inspected on a regular basis as part of the facility inspection program (see GH-4). These facilities were included in 100% of the facilities inspections that occurred in Year 5.</p>
5	Compile and report vehicle maintenance locations. Perform and document routine inspections (GH-6)	<p>Met goal.</p> <p>The City's two (2) fleet maintenance facilities are inspected on a quarterly basis as part of the facility inspection program (see GH-4). Inspection reports are retained on-file. These facilities were included in 100% of</p>

		the facilities inspections that occurred in Year 5.
5	Implement policies and procedures associated with vehicle washing operations to protect WQ (GH-7)	Vehicle wash SOPs have been developed for locations where City vehicles are washed. A majority of City vehicles are washed at privately-owned commercial car washes negating the need to wash on City property. These facilities were included in 100% of the facilities inspections that occurred in Year 5.
5	Landscaping Management (GH-8)	<p>Met goal.</p> <p>The City continues to employ Texas Department of Agriculture (TDA) licensed chemical applicators who are responsible for conducting and/ or overseeing all pesticide, herbicide, and fertilizer applications. A total of 12 staff members hold TDA chemical applicator licenses. These employees attend regular training to maintain credits for their licenses. All chemical applications are done by licensed applicators or under the supervision of licensed applicators as permissible under TDA regulations.</p> <p>All chemical applications and inventories are conducted according to guidelines and regulations set forth by the TDA.</p>
5	Inventory, inspection, and maintenance of City-owned structural controls (GH-9)	<p>Met Goal.</p> <p>The City currently owns four (4) water quality treatment basins and/ or stormwater filtration controls. City Staff inspected and maintained the structural water quality controls in Year 5.</p>
5	Spill Prevention and Response (GH-10)	<p>Met Goal.</p> <p>No spills caused by city staff were reported during Year 5.</p>

5	Spill response procedures and clean-up training to applicable City employees (GH-10)	Did not meet goal.  One (1) training session attended by 7 city staff was conducted the Texas Regional Stormwater Conference (CTSC). Future training will be implemented to help reach the MS4s goals next permit year.
5	Provide spill response kits at applicable City facilities (GH-10)	Met goal.  Spill response kits have been supplied to various departments and to applicable staff. Applicable departments have retained spill clean-up kits and kept available for use in permit Year 5. A check for spill kits was conducted during 100% of the routine quarterly inspections at high-risk City facilities during Year 5 (see GH-4).
5	Provide and document MS4-related training to City staff (GH-11)	Did not meet goal.  One (1) training session attended by 7 city staff was conducted the Texas Regional Stormwater Conference (CTSC). Sign-in sheets and training materials have been retained.
5	Record and report the amount of green waste recycled (GH-12)	Met goal.  The City continued to implement a green waste recycling program. Approximately 3,245 tons of green waste collected as part of the City's Green Waste program in Year 5. Green waste collected by the City was diverted from the landfill and sent to Comal County Recycling Center to be mulched. Green waste from City operations is taken to the Comal County Recycling Center for mulching.
5	Develop methods to promote green waste recycling and mgmt. (GH-12)	Met goal.  The City's green waste webpage ( <a href="https://newbraunfels.gov/872/Gr">https://newbraunfels.gov/872/Gr</a>

		een-Waste) includes information on the residential green waste recycling program such as collection requirements, acceptable and prohibited items, and composting information.
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## 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.?

## 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 Comal River, Segment 1811, was included on the 2020 Texas Integrated Report 303(d) list (Category 5c) as impaired for bacteria. The 2016 Texas 303(d) list was adopted by the TCEQ on March 25, 2020 and approved by EPA on May 12, 2020. The Comal River lies entirely within the New Braunfels city limits. The Comal River has been on the 303(d) list since 2016.
  - The Dry Comal Creek, Segment 1811A, was first listed in 2010 and was included on the 2020 Texas Integrated Report 303(d) list (Category 5c) as impaired for bacteria. Only a portion of the Dry Comal Creek lies within the New Braunfels city limits.
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, in collaboration with Texas A&M and Guadalupe Blanco River Authority (GBRA), performed bacterial source tracking in 2013 and 2016 to identify sources of bacteria in both the Comal River and Dry Comal Creek. The results concluded that approximately 60-70% of bacteria were from avian and non-avian wildlife.
  - The City enacted an ordinance prohibiting the feeding of wildlife (Ordinance No. 2018-58, City Code Section 82-24 to 82-28) in order to help disperse overabundant waterfowl and white-tailed deer populations. The ordinance was enacted on September 10<sup>th</sup>, 2018 and became effective in March 2019. The City also implemented a non-native waterfowl trapping program to capture non-native

ducks and geese in Landa Park (location of the headwaters of the Comal River) where overabundant populations exist, and excessive excrement has been observed along the banks of the lake contributing to bacteria loading. The wildlife feeding ordinance remains in effect and was enforced by the City in Year 4.

- The Dry Comal Creek and Comal River Watershed Protection Plan (WPP) has been accepted by the TCEQ and was formally accepted by the EPA on September 21<sup>st</sup>, 2018. The City applied for and was awarded a 319 grant to implement the WPP. The City has taken the lead on WPP implementation efforts aimed at reducing bacteria loading to the Dry Comal Creek and Comal River. WPP Implementation activities include, but are not limited to, urban wildlife management, pet waste management, and education/ outreach. The City continued to implement the WPP and ensured that WPP and MS4 activities and funding were tracked separately.
- The City continued to fund GBRA to perform routine, monthly *E.coli* bacteria sampling on both the Dry Comal Creek and Comal River to help assess bacteria loading trends and to monitor for improvements in bacteria levels in response to the implementation of bacteria management measures. GBRA/ TCEQs Clean Rivers Program Sampling data can be accessed via <https://www.gbra.org/crp/sites/comal.aspx>. *E.coli* bacteria data performed by GBRA on behalf of the City is kept on file and can be provided upon request.
- The City utilized public education to inform residents of proper pet waste management, on-site sewer facility (OSSF) management, and negative impacts of wildlife feeding. Public education efforts associated with reducing bacteria loading consisted of printed brochures, oral presentations, and newspaper inserts.
- Per an existing Sanitary Sewer Overflow (SSO) agreement between New Braunfels Utilities (NBU) and the TCEQ, NBU addressed bacteria loading by implementing several programs to prevent SSOs. These initiatives include: 1) inspections and preventative maintenance for lift stations; 2) annual inspections of high-risk sewer infrastructure; 3) implementation of a Fat, Oil, and Grease (FOG) program; 4) rehabilitation of any defective sewer pipes; 5) increased sewer line inspections.

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

Not Applicable

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

<b>Benchmark Parameter</b>	<b>Benchmark Value</b>	<b>Description of additional sampling</b>	<b>Year(s) conducted</b>

<i>(Ex: Total Suspended Solids)</i>		<b>or other assessment activities</b>	
<b>Not Applicable, No TMDL</b>			

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>
<b>Not Applicable, No TMDL</b>		

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

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>
<b>Make improvements to reduce sanitary sewer overflows: Inspect high risk sanitary sewer infrastructure</b>	<b>All high-risk infrastructure including aerial crossings, inverted siphons and air release valves are inspected by New Braunfels Utilities (NBU) annually.</b>
<b>Make improvements to reduce sanitary sewer overflows: Rehabilitation of defective sanitary sewer piping.</b>	<b>NBU rehabilitated 151.5 feet of pipe and 431 manholes in FY24.</b>
<b>Make improvements to reduce sanitary sewer overflows: Inspection of sanitary sewer collection system</b>	<b>NBU inspected a total of 477,007.63 feet of sewer piping in FY24 using a combination of CCTV and Sewer Line Rapid Assessment Tool.</b>
<b>Address Lift Station Inadequacies</b>	<b>NBU inspected 26 lift stations routinely throughout the year.</b>
<b>Fats, Oil, and Grease (FOG) program</b>	<b>NBU requires that all Food Service Establishments (FSEs) have their grease interceptors pumped and cleaned every 90 days. NBU inspects approximately 99% of all FSEs with grease interceptors (372) annually to ensure proper operation and maintenance of</b>

	<b>grease interceptors. NBU also implements an education program to inform FSE owners and the general public on ways to reduce FOG inputs to the collection system.</b>
Pet Waste Management Education	CoNB distributed information regarding pet waste management utilizing brochures, presentations, and newspaper releases. In addition, pet waste collection stations, which include a message regarding proper pet waste disposal, are installed at City parks.
On-Site Sewage Facilities and Inspections	CoNB investigates all complaints regarding OSSF's and takes appropriate and timely action on all documented violations and reports such activity to the State on a monthly basis. Appropriate response actions include immediate correction of the identified hazard, in addition to possible criminal or civil enforcement action as necessary.
Animal Sources	The City contracted with Texas A&M Microbiology lab in 2013 and 2016 to conduct a bacteria source tracking analysis on the Comal River and Dry Comal Creek. The analysis showed that 60-70% of bacteria found in these waterways was from avian and non-avian wildlife. The City worked with Texas Parks and Wildlife Department and stakeholders to determine methods for addressing overabundant wildlife and bacteria related to wildlife. The City passed an ordinance prohibiting the feeding of wildlife within the City limits in Sept 2018 (Ordinance 2018-58). The City enforced the ordinance in Year 5 and continued to do public education regarding the feeding ordinance and overabundant wildlife. The feeding ordinance is expected to decrease the concentration of urban wildlife in contributing watershed areas, also decreasing bacteria loading. Additional wildlife management measures are being implemented through the Comal River and Dry Comal Creek Watershed Protection Plan which is aimed at reducing bacteria loading.
Bacteria Management Education	CoNB utilized public education to inform residents of proper pet waste management, on-site sewer facility management, and negative impacts of wildlife

	feeding. Public education efforts associated with reducing bacteria loading consisted of printed brochures, website, and newspaper inserts. Bacteria management education initiatives are included with Public Education and Outreach measures in MCM-1.
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7. Assess the progress to determine BMP's effectiveness in achieving the benchmark.

For example, the MS4 may use the following benchmark indicators:

- number of sources identified or eliminated;
- number of illegal dumping incidents;
- increase in illegal dumping reported;
- number of educational opportunities conducted;
- reductions in sanitary sewer flows (SSOs);/or
- increase in illegal discharge detection through dry screening.

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
<b>Not Applicable</b>	

## **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>
<b>1</b>	<b>PE-1</b>	<b>Stormwater Education and Information</b>	The City will continue to utilize its Watershed Management and MS4 Stormwater webpage to provide information to the public regarding volunteer clean-up events, information regarding MS4 program activities and pollution prevention tips.
<b>1</b>	<b>PE-2</b>	<b>Public Participation and Involvement</b>	The City will plan to hold regular, quarterly meetings with the City of New Braunfels

			Watershed Advisory Committee (WAC). The WAC will be presented stormwater, watershed and MS4 program-related topics and will be provided an opportunity to provide recommendations and input.
<b>1</b>	<b>PE-2</b>	<b>Watershed and River Clean-Up Events</b>	The City has coordinated and hosted the 7 <sup>th</sup> Annual Dos Rios Watershed Clean-Up in Oct. 2023.
<b>1</b>	<b>PE-4</b>	<b>Presentations to Local Schools and Youth Groups</b>	The City will provide outreach to local schools and youth groups.
<b>1</b>	<b>PE-3</b>	<b>Partnerships with Other Water-Based Organizations</b>	The City will continue to participate in the Edwards Aquifer Habitat Conservation Plan (EAHCP). The City's 2024 EAHCP work plan includes continued riparian zone restoration/improvements and design/ construction of green stormwater infrastructure projects. The City will continue to collaborate with the Texas Regional Stormwater Coalition (CTSC) made up of MS4 program managers from the City of New Braunfels, City of San Marcos and Texas State University. The CTSC has decided to hold a Texas Regional Stormwater

			Conference in January 2024. The coalition continues to meet and discuss future projects, events, and to discuss how the different entities address MCMs. The coalition is considering alternative methods of outreach to reach the professional stormwater management community instead of hosting a conference.
<b>1</b>	<b>PE-5</b>	<b>Adopt-A-Spot Volunteer Program</b>	The City will continue to implement the Adopt-A-Spot River Clean-Up program to allow an opportunity for local businesses and civic organizations to adopt a spot along a creek or river to collect litter on a quarterly basis.
<b>1</b>	<b>PE-6</b>	<b>Tree City USA Program</b>	The City will continue to participate in the Tree City USA program and host an annual Arbor Day tree giveaway event.
<b>2</b>	<b>ID - 1</b>	<b>Storm Sewer Mapping</b>	The City will continue to update the city's comprehensive MS4 GIS map and database with new and updated outfall and drainage infrastructure.
<b>2</b>	<b>ID-2, ID-4</b>	<b>IDDE - Detection and Elimination Program</b>	The City will continue to document and follow-up on all illicit discharges reported by citizens and city staff. Any observed

			illegal discharges will be tracked and eliminated per the established SOPs.
2	<b>ID-2</b>	<b>IDDE - Dry Weather Outfall Screening</b>	The City will continue to perform dry weather outfall screening stormwater outfalls.
2	<b>ID-3</b>	<b>Field Staff Training</b>	The City will continue to offer training opportunities to field staff that may encounter an illegal discharge while performing their job.
2	<b>ID-6</b>	<b>IDDE - River Clean-Up</b>	The City will continue to contract services for the routine collection of river recreation-related litter from local parks and the Guadalupe and Comal Rivers.
2	<b>ID-7</b>	<b>IDDE - Waste Collection Events</b>	The City will host household hazardous waste and bulky waste collections events to reduce the potential for improper disposal.
3	<b>CS-1 &amp; CS-2</b>	<b>Construction Site Inspection Program and Site Inventory</b>	The City will continue to document and map active construction sites and perform routine inspections to minimize the potential for construction-related pollutant discharges to the MS4 and surface waters.
4	<b>PC-1</b>	<b>Staff Training on Post-Construction SWM Structures</b>	The City will continue to offer training opportunities to field staff whose job duties include inspection and

			maintenance of stormwater management structures.
4	<b>PC-2 &amp; PC-3</b>	<b>Post-Construction Stormwater Treatment and Maintenance Requirements</b>	The City will review plans for all new development projects to ensure that applicable projects (those adding >5,000 square feet of new impervious cover) are required to implement stormwater/ water quality treatment devices as part of their developments. City will inspect water quality treatment facilities to ensure adequate maintenance is being performed.
4	<b>PC-5</b>	<b>Encouragement of LID Designs</b>	The City is planning to implement additional LID and green infrastructure projects that will serve as pilot projects and examples for local engineers and the development community.
4	<b>PC-6</b>	<b>Establishment of Riparian Zones and Natural Vegetative Areas</b>	The City will continue to actively encourage and promote the establishment and protection of riparian zones and naturally vegetated areas.
5	<b>GH-1</b>	<b>Street Sweeping Program</b>	The City will continue to implement its street sweeping program that has proved to reduce the amount of sediment, debris, and other pollutants from being

			carried to the MS4 and surface waters by stormwater runoff.
5	<b>GH-2, GH-3, GH-4</b>	<b>Facility Inspection Program</b>	The City will continue to perform quarterly inspect of all high-risk City facilities to ensure that City operations and facilities are not contributing pollutants. The City will also continue to update the facilities inventory and survey as new facilities are completed and older facilities are taken out of use.
5	<b>GH-8</b>	<b>Landscaping</b>	The City will continue closely monitor the adherence to established BMPs by city staff and contractors working in the field.
5	<b>GH-9</b>	<b>Structural Control Maintenance</b>	The City will maintain the inventory of city-controlled stormwater structural controls. The City will also continue to maintain existing structural controls according to established BMPs.
5	<b>GH-10</b>	<b>Spill Prevention and Response</b>	The City will continue to offer training opportunities to field staff on how to prevent and response to spills.
5	<b>GH-11</b>	<b>Employee Training Program</b>	The City will continue to offer training opportunities to field staff to promote general good housekeeping

			practices while on the job.
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## 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:

**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.

3. 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)
<b>Not Applicable</b>			

## 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).

Name and Explanation: New Braunfels Utilities (NBU) is identified in the City's SWMP to perform tasks associated with addressing bacteria impairments on stream segments within the City limits. NBU is responsible for performing infrastructure inspections, preventative maintenance, and rehabilitation of the sanitary sewer system to prevent overflows and discharges. These activities are conducted as part of the Sanitary Sewer Overflow Initiative agreement between NBU and TCEQ. Specific activities conducted by NBU are included in Section D (*Impaired Waterbodies*) of this report.

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  Not Applicable

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

Authorization Number: **Not Applicable**

Permittee: \_\_\_\_\_

Authorization Number: \_\_\_\_\_

Permittee: \_\_\_\_\_

## 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):

148 (this number is generated through a combination of receipts of submitted Site Notices/NOIs and City development & building permit. All active construction sites are entered into a database and map that are used to guide track inspections).

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>	
<b>The total number of acres disturbed for municipal construction projects</b>	<b>Not Applicable</b>

**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): Robert Camareno Title: City Manager

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name of MS4: City of New Braunfels