

**STORMWATER
MANAGEMENT
PROGRAM
ANNUAL REPORT**

*Developed in accordance with the requirements of TEXAS
COMMISSION ON ENVIRONMENTAL QUALITY -
TEXAS POLLUTANT DISCHARGE ELIMINATION
SYSTEM - TPDES GENERAL PERMIT TXR040000*



Permit Term:

January 24, 2019 – January 23, 2024

Prepared December 2019 – Year 1 Permit Period 3



**LRGV TPDES Stormwater Task Force
Founded in 1998**

City of Alamo
City of Alton
City of Brownsville
Cameron County
Cameron County Drainage District #1
City of Donna
City of Edcouch
City of Edinburg
City of Elsa
City of Harlingen
City of La Feria
City of La Joya
City of La Villa
City of Los Fresnos
City of Mercedes
City of Mission
City of Palmhurst
City of Palmview
City of Primera
City of San Benito
City of San Juan
City of Weslaco
Town of Combes

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A. General Information

Table 1.0 identifies the members of the Lower Rio Grande Valley TPDES Stormwater Task Force. The permit period is identified as January 24, 2019 to January 23, 2024; all of the listed MS4s in Table 1.0 are operating under a regional watershed-based Stormwater Management Program (SWMP). The SWMP approved during the first permit period (Years 2007-2012) has been completely replaced by this watershed-based regional SWMP. The comprehensive program which includes regional programs, regional best management practices (BMPs), and MS4-specific BMPs has been slowly incorporated into the region's stormwater management programs. This annual report will cover the period from October 1, 2018 to September 30, 2019. Moreover, it is important to remind the TCEQ that the Task Force coalition, facilitated since 1998 by Texas A&M University-Kingsville (TAMUK), in May 2016, opted to transition its coalition and administrative programs to The University of Texas Rio Grande Valley (UTRGV), and slowly transitioned all operations to UTRGV by Summer 2018. In November 2018, the Task Force opted to transition its coalition and administrative programs to the Research, Applied Technology, Education and Services, Inc. – Rio Grande Valley (RATES), and expediently transitioned all operations to RATES by Fall 2019. The Task Force used the first year (Year 1) of permit period 3 to “catch up” and fulfill the requirements of the SWMP. This annual report still follows the implementation schedule of the Permit Period 2 SWMP since the SWMP for the 3rd permit period is still under review by the TCEQ.

Authorization Number(s):

Table 1-0 LOWER RIO GRANDE VALLEY TPDES STORMWATER TASK FORCE			
MS4	Permit No.	2010 Population	MS4 LEVEL
Alamo	TXR040289	18,353	2
Alton	TXR040162	12,341	2
Brownsville	TXR040264	174,023	4
Cameron County	TXR040051	N/A	2
Cameron County Drainage District #1	TXR040236	N/A	2
Donna	TXR040165	15,798	2
Edcouch	TXR040627	3,161	1
Edinburg	TXR040323	77,100	3
Elsa	TXR040416	5,660	1
Harlingen	TXR040164	64,849	3
La Feria	TXR040286	7,302	1
La Joya	TXR040288	3,985	1
La Villa	TXR040404	1,500	1
Los Fresnos	TXR040270	5,542	1
Mercedes	TXR040636	15,570	2
Mission	TXR040168	77,058	3
Palmhurst	TXR040637	2,607	1
Palmview	TXR040536	5,460	1
Primera	TXR040002	4,070	1
San Benito	TXR040161	24,250	2
San Juan	TXR040167	33,856	2
Town of Combes	TXR040628	1,600	1
Weslaco	TXR040262	35,670	2

Reporting Year: 1

Annual Reporting Year Option Selected by MS4:

Calendar Year _____

Permit Year_____

Fiscal Year: X Last day of fiscal year: (9-30-19)

Reporting period beginning date: (month/date/year): 10/1/2018

Reporting period end date (month/date/year): 9/30/2019

The MS4 authorization number, operator level and name of MS4 is listed in Table 1-0.

The following are the contact person(s) for each Task Force member:

Task Force Members:

Santa Cruz Irrigation District #15
Joe Hinojosa, General Manager
601 E. FM 2812
PO box 599
Edinburg TX 78504-0599
956-648-1416
josehinojosa290@gmail.com

City of Weslaco
Peter Hermida E.I.T.
255 S. Kansas Ave.
Weslaco, Texas 78596
Ph. (956) 973-4002 ext. 1401
Fax: (956) 973-3128
pher mida@weslacotx.gov

City of Alamo
Ernesto Solis
Melissa Gonzales
420 N Tower Road
Alamo TX, 78516
esolis@alamotexas.org
mgonzales@alamotexas.org
P 956-787-0006
F 956-283-8855

City of La Feria
Jaime Sandoval
Juan Ortiz
115 E. Commercial Avenue
La Feria, Texas 78559
jsandoval@cityoflaferia.com
jortiz@cityoflaferia.com
956-797-2261
Cell: 956-261-0382

County of Cameron
Department of Transportation
Benjamin Worsham, P.E.
Raul Gomez
1390 West Expressway 77
San Benito, TX 78586
(956) 247-3533
Benjamin.Worsham@co.cameron.tx.us
Raul.Gomez@co.cameron.tx.us

City of Donna
Roy Jimenez
Daniel Ramirez
307 S. 12th Street
Donna, Texas 78537
rjimenez@cityofdonna.org
dramirez@cityofdonna.org
(956) 464-3314/3692 (956)720-6360

City of La Joya
Isidro Venecia
101 N. Leo Avenue
P.O. Box H
La Joya, Texas 78560
cityoflajoya@aol.com
isidrovenecia@yahoo.com
(956) 580-7029/583-7598

City of San Benito
Bernard Rodriguez
Cleo Longoria
401 N. Sam Houston
San Benito, Texas 78586
brodriguez@cityofsanbenito.com
clongoria@cityofsanbenito.com
(956) 361-3804 ext 415
(956) 456-8921

City of Alton
Jeff Underwood
509 S. Alton Blvd.
Alton TX 78573
jeff.underwood@alton-tx.gov
Office: (956) 432-0760
Fax: (956) 432-0766
Cell: (956) 522-7054/975-5669

City of Mercedes
Sergio Zavala, City Manager
Jose Figueroa
400 S. Ohio Avenue
P.O. Box 837
Mercedes, TX 78570
Phone: (956) 565-3114 Ext. 130
Fax: (956) 565-5147
szavala@cityofmercedes.com
jfigueroa@cityofmercedes.com

Willacy County
Honorable Eduardo Gonzales
County Commissioner
576 W. Main Ave.
Raymondville, Texas 78580
Office (956) 689-3393
Fax (956) 689-4817
eduardogonzales0758@gmail.com

Hidalgo County Pct #1
Saul Garcia
Chief of Staff Office of Commissioner David Fuentes
100 East Cano
Edinburg, TX 78538
(956) 367-0878
saul.garcia@co.hidalgo.tx.us

Town of Combes
Megan Meidel
21626 Hand Rd.
Combes, TX 78535
Phone: (956) 425-7131
mmeidel@townofcombes.com

City of La Villa
David Alaniz
Arnie Amaro
916 S. Mike Chapa
P.O. Box 60
La Villa, TX 78562-0060
(956) 262-2122
operations@cityoflavilla.org
aamaro@cityoflavilla.org

Hidalgo County Pct #4
Velinda Reyes
Chief Administrator, External Affairs
Hidalgo County Precinct 4
1051 N. Doolittle Rd
Edinburg, TX 78542
Main: (956) 383-3112
Fax: (956) 381-5905
velinda.reyes@co.hidalgo.tx.us

City of Elsa
Delmira Yanez
Oscar Garza
PO Box 427
102 S. Dianna St.
Elsa, TX 78543
(956) 262-2127
elsacitysecretary@cityofelsa.net
ogarza@cityofelsa.net

City of Harlingen
Xavier Cervantes
City of Harlingen
502 E. Tyler Avenue
Harlingen, Texas 78550
Phone: (956) 216-5109
Fax: (956) 216-5265
xcervantes@myharlingen.us

City of Edcouch
Victor De La Cruz
Manuel Hernandez
Nancy Herrera
P.O. Box 100
Edcouch, Texas 78538
(956) 262-2140
citymanager@cityofedcouch.org
mannyhernandez@cityofedcouch.org
nancy_cityofedcouch@aol.com

City of Mission
J.P. Terazzas, P.E.
1201 E. 8th Street
Mission, Texas 78572-5812
(956) 227-7934
jpterazzas@missiontexas.us

Cameron County Drainage District #1
Hector Lerma
Albert Barreda
Veronica Martinez
3510 OLD PORT ISABEL ROAD
BROWNSVILLE, TX 78526
(956) 838-0162/(956) 459-1277 (cell)
(956) 371-9209 (Hector cell)/(956) 831-7602 FAX
h.lerma2221@yahoo.com
abarreda@drainagedistrictone.org
veronicamartinez33@msn.com

City of Edinburg
Robert Valenzuela
David De La Fuente
415 W. University Drive
Edinburg, Texas 78539
Phone: (956) 388-8211
Fax: (956) 383-7111
rvalenzuela@cityofedinburg.com
ddelafuente@cityofedinburg.com

City of Palmhurst
Lori Lopez, City Manager
Lupe Garcia
4417 N. Shary Rd.
Palmhurst, TX 78570
Phone: 956-583-8697
llopez@cityofpalmhurst.com
lgarcia@cityofpalmhurst.com

City of San Juan
Roel Garza
David Salinas
709 S. Nebraska
San Juan, Texas 78589
rgarza@sjtx.us
dsalinas@cityofsanjuantexas.com
(956) 223-2333/(956) 588-1210
(956) 223-2200/(956) 588-5753

City of Primera
Celina Gonzales
22893 Stuart Place
Primera, TX 78552
(956) 423-9654
(956) 423-2166 (fax)
cgonzales@cityofprimera.com

City of Palmview
Rudy Flores
400 West Veterans Blvd.
Mission, TX 78572
Phone: 956-432-0300
Cell: 956-522-1575
rflores@cityofpalmview.us

City of Los Fresnos
Raul Garcia
Augustin Lopez
200 North Brazil Street
Los Fresnos, Texas 78566
956-233-5768 office
rgarcia@citylf.us

City of Brownsville
Carol Vasquez
Martino Trevino
1001 Elizabeth St
Brownsville, Texas 78521
956-525-3604 office
carol@cob.us

A copy of the annual report was submitted to the TCEQ Region YES NO Region the annual report was submitted. TCEQ Region 15

B. Status of Compliance with the MS4 GP and SWMP

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

Table 2.0 PERMIT CONDITIONS			
Condition	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		
Permittee is currently in compliance with recordkeeping and reporting requirements.	X		
Permittee meets the eligibility requirements of the permit (e.g. TMDL requirements, Edward’s Aquifer, compliance history, etc.)	X		

2. Provide a general assessment of the appropriateness of the selected BMPs.

All BMPs included in the regional SWMP have been deemed appropriate in reducing discharge of pollutants to the Maximum Extent Possible (MEP). See Table 3.0 for more details on general assessment.

3. Describe progress towards reducing the discharge of pollutants to the maximum extent practicable. Summarize any information used (such as visual observation, amount of materials removed or prevented from entering the MS4, or if required monitoring data, etc.) to evaluate reductions in the discharge of pollutants.

A progress assessment of each BMP to the MEP is provided in Table 4.0.

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

A general evaluation of the MCMs is provided in Table 5.0.

C. Stormwater Monitoring Data

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.? (Refer to the MS4 General Permit TXR040000 Part IV Section B.2.(b))

At this period, the Task Force has not conducted any significant monitoring of stormwater quality beyond the requirements of the SWMP. The Task Force members conduct monthly street sweeping, seasonal housekeeping of the MS4 system, IDD&E and construction site inspections, dry weather inspections, and associated training and education and outreach. Tables 3.0 and 4.0 detail the BMPs performed by the membership.

D. Impaired Waterbodies

1. 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 (Refer to MS4 General Permit TXR040000 Part IV Section B.2.(c))
2. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)):
3. Report the benchmark identified by the MS4 and assessment activities (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)(6)):
4. Provide an analysis of how the selected BMPs will be effective in contributing to achieving the benchmark (Refer to the MS4 General permit TXR040000; Part II Section D.4.(a)(4)):
5. If applicable, report on focused BMPs to address impairment for bacteria (Refer to the MS4 General Permit TXR040000; Part II Section D.4.(a)(5)):
6. Assess the progress to determine BMP's effectiveness in achieving the benchmark (Refer to the MS4 General Permit TXR040000; Part II.D.4.(a)(6)):

There are no EPA-approved TMDLs within the jurisdictions of the Task Force membership. Moreover, the SWMP is not subject to Part II.D.4.a. With regards to bacteria source determination and the bacteria impairment program associated with the SWMP (Chapter 8 of the SWMP), the Task Force has developed a workgroup to assist in developing a source determination strategy that includes review of pertinent historical literature, assessing existing EPA (RCRA, CERCLA, etc.), TCEQ (MSW, LPST, etc.) and other similar permit/registration databases, review of local health department records, review of past and active local and/or regional study findings, and review of other pertinent documentation. The assessment is still ongoing and no reporting of this information is not available at this time. The Task Force will continue the assessment during the new permit period. The Task Force will identify BMPs and ensure that the SWMP includes focused BMPs, along with corresponding measurable goals, that the permittee will implement, to reduce, the discharge of pollutant(s) of concern that contribute to the impairment of the water body. The timeline of this BMP will be adjusted accordingly. It is important to note that the Task Force is leading 4 TCEQ NPS CWA Chapter 319 watershed projects and is a key partner in a 5th watershed project in the LRGV. All 5 projects are addressing bacteria concerns. An active bacteria workgroup will continue to work with the TCEQ to address bacteria pollutants.

E. Stormwater Activities

Describe any stormwater activities the MS4 operator has planned for the next reporting year.

- a. M.C.M. 1- PUBLIC EDUCATION, OUTREACH, AND INVOLVEMENT

1. Expand outreach to include additional school campuses, professional organizations
 2. Continue webcasts, professional courses (soil erosion, GIS, inspections)
 3. Conduct 22nd annual stormwater conference.
 4. Improve social media and websites
 5. Continue with public hearings
 6. Promote additional volunteer efforts
- b. M.C.M. 2 - ILLICIT DISCHARGE DETECTION AND ELIMINATION
1. Specific Illicit Discharge Detection and Elimination SW Ordinance (IDDE) Adoption and training
 2. Enforcement of IDDE SW Ordinance
- c. M.C.M. 3 - CONSTRUCTION SITE STORM-WATER RUNOFF CONTROL
1. Develop, adoption and provide training on additional ordinances
 2. Enforcement of SW Ordinances
- d. M.C.M. 4 - POST-CONSTRUCTION STORM-WATER MANAGEMENT
1. Specific Post-Construction Adoption and training
 2. Promotion of Post-Construction SW Ordinance
 3. Green Ordinance Development
- e. M.C.M. 5 - POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS
1. Finalize Standard Operating Procedures
 2. Assess and possibly establish electronic record keeping

F. SWMP Modifications

During the Fall 2018, the City of Elsa, City of Edcouch and the City of Harlingen joined the Task Force. The City of Brownsville rejoined the Task Force in Spring 2019. The regional SWMP is actively being revised to include their participation. Due to the transition of the coalition from UTRGV to RATES, the SWMP is actively being reviewed and will be revised accordingly. The changes will be included in the pending SWMP. No significant changes are anticipated other than administrative language, logos and related information.

G. Additional BMPs

No changes to SWMP proposed other than aforementioned in Section F.

H. Additional Information

The Task Force is comprised of twenty-one (21) MS4s listed in Section A, Table 1-0 of this annual report. All MS4s use a standard memorandum of agreement that provides the structure, administration and legal authority of the organization. The legal name of the Task Force is **Lower Rio Grande Valley Texas Pollutant Discharge Elimination System Stormwater Task Force**. This is a system-wide annual report including information for all permittees. All represented permittees have signed the report in accordance with signatory requirements, 30 Texas Administrative Code (TAC) §305.128.

I. Construction Activities

1. Provide the number of construction projects in the jurisdiction of the MS4 where the permittee was not the construction site operator.

The Task Force is assessing individual programs and is determining the feasibility of expanding the existing programs to a regional scale. No changes are proposed at this time. RATES and key MS4 partners are developing recordkeeping BMPs. This data will be provided in the next reporting period. Pursuant to the TCEQ Central Registry, NOIs submitted to the TCEQ by construction site operators are presented in Table 6-0.

Table 6-0 LOWER RIO GRANDE VALLEY TPDES STORMWATER TASK FORCE TCEQ DATABASE NOIs		
MS4	Permit No.	2018 - 2019 NOIs
Alamo	TXR040289	12
Alton	TXR040162	4
Brownsville	TXR040264	52
Cameron County	TXR040051	10
Cameron County Drainage District #1	TXR040236	0
Donna	TXR040165	15
Edcouch	TXR040627	2
Edinburg	TXR040323	63
Elsa	TXR040416	11
Harlingen	TXR040164	25
La Feria	TXR040286	5
La Joya	TXR040288	2
La Villa	TXR040404	1
Los Fresnos	TXR040270	6
Mercedes	TXR040636	12
Mission	TXR040168	43
Palmhurst	TXR040637	1
Palmview	TXR040536	7
Primera	TXR040002	1
San Benito	TXR040161	14
San Juan	TXR040167	3
Town of Combes	TXR040628	1
Weslaco	TXR040262	24

2. Does the permittee utilize the seventh MCM related to construction? To answer “Yes,” this must have been requested on the Notice of Intent (NOI) or on an NOC and approved by the TCEQ. This MCM is not applicable.

J. Certification

For shared SWMPs, it would be acceptable to submit separate signature pages for each operator participating in the shared SWMP along with one copy of the system-wide annual report.

Table 3.0
BMP General Assessment (All MS4s)

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted below.</i>	
Education, Outreach, and Involvement	3.2.0 Assess Existing programs	Yes	In progress/ongoing
Education, Outreach, and Involvement	3.2.1 Utility Inserts and /or Mail outs	Yes	Outreach materials in the forms of small brochures, informative handouts or fact sheets will continue to be distributed with municipal water utility bills and/or mailouts as budget allows.
Education, Outreach, and Involvement	3.2.2 Website	Yes	Background and other information on the SWMP, including the MCMs along with specific information promoting the stormwater education program and other general information can be found at www.rgvstormwater.org . The website BMP will continue providing outreach materials, training schedules, downloadable information and an email address for feedback from the public.
Education, Outreach, and Involvement	3.2.3 Classroom Presentations	Yes	Program materials include curriculum on water quality and water conservation, stormwater pollution prevention, and promotion of the SWMP. Classroom visits are conducted by the MS4 that include speakers.
Education, Outreach, and Involvement	3.2.4 Stenciling	Yes	A successful storm drain stenciling program was initiated by the LTSTF during the last permit period. Using grant funding and local funding local government staff provided stormwater education programs and facilitated storm drain stenciling activities with youth and citizens' organizations, and as part of their stormwater management program. The LTSTF will continue to facilitate the development of partnerships with local youth service groups to perform a significant portion of the storm drain stenciling work as needed. These groups may include the Boys & Girls Clubs, Boy Scouts of America, and local environmental groups. The stencil will include the logo of the LRGV TPDES Task Force and/or the MS4.
Education, Outreach, and Involvement	3.2.5 Brochures and Videos	Yes	The LTSTF has produced various brochures during the previous permit period and successfully delivered to the region. Topics include soil erosion prevention, rain harvesting, low impact development, and Arroyo Colorado watershed protection topics. Dozens of videos (PSA format) have been developed by the LTSTF and delivered to the region using public access Channels using Spectrum Channel 17 (local school district television), local government networks (Channel 12), websites and You Tube. The PSA program includes customized projects, i.e. documentary and 30-second clips in English and Spanish. The LTSTF will continue this outreach and will expand the effort by developing new customized PSAs during the permit period. Additional brochures will be developed. Similar delivery tools will be utilized. This BMP also has used self-service stations (public-owned facility lobbies), libraries and outreach events to deliver information.

**Table 3.0a
BMP General Assessment (All MS4s)**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted below.</i>	
Education, Outreach, and Involvement	3.2.6 Signage	Yes	Stormwater pollution prevention signs were designed, produced and installed along major intersections within the MS4 membership of the LTSTF. The signs bear the logos from the LTSTF and the MS4. Signage were placed throughout the region at locations where pedestrians and vehicle drivers will recognize the sign as an indicator of a local water body that should be protected, the importance of water quality, and the potential effects of stormwater pollution. Messages were conveyed in English and Spanish. This BMP will continue.
Education, Outreach, and Involvement	3.2.7 Community Outreach	Yes	The LTSTF has provided educational and outreach materials to the community, including brochures, fact sheets and handouts. These materials are made available at City Halls, and throughout public-owned facilities. Materials are made available to developers, businesses, and contractors during the planning and permitting processes. The LTST promotes its stormwater pollution prevention outreach program at various annual community events. Booths, brochures, children- friendly materials, and other similar approaches are used. The LTSTF shall consider designating a day or a week for stormwater pollution prevention awareness. The LTSTF has developed partnerships with various regional entities and coordinates an annual conference that promotes the SWMPs of the region. This highly successful conference is held annually at South Padre Island. This BMP will continue to be developed.
Education, Outreach, and Involvement	3.2.8 Education -General Watershed Protection Plan (non-ACWP BMP)	Yes	A watershed information curriculum with associated materials and training is available and advertised to the businesses, educational community and the general community. Program materials promote the ACWP. The LTSTF will continue to work closely with the ACWP to implement this BMP. The impairment of the Arroyo Colorado is of great concern to our region. Four additional TCEQ watershed protection plan projects are now being led by th LTSTF. These projects will be incorporated into the existing SWMP in the next permit period.
Education, Outreach, and Involvement	3.2.9 Public Meetings	Yes	Annual public meetings are conducted to provide citizens with the opportunity to discuss various viewpoints and provide input concerning stormwater quality issues. Meetings are publicized in accordance with public notification requirements in each jurisdiction, such as a local newspaper or appropriate publication of wide circulation.
Education, Outreach, and Involvement	3.2.10 Advisory Committee	Yes	This BMP has been modified after general consensus indicated that a regional SWMP requires regional input and feedback. The LTSTF is comprised of several workgroups (i.e. outreach, ordinance, construction, grant, etc.) that provide much needed information to effectively implement and evaluate the coalition's SWMP. The organization will serve as the advisory workgroup for the MS4 partners.

**Table 3.0b
BMP General Assessment (All MS4s)**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted below.</i>	
Education, Outreach, and Involvement	3.2.11 Hotline	Yes	A Stormwater Hotline has been developed and implemented by the majority of the MS4s to promote outreach, enforce policy and to facilitate public involvement. The hotline is used for reporting illicit and illegal connections and discharges, illegal dumping, emergency and non-emergency incidents and other stormwater related activities. The hotline operator provides readily-available information and direction for further communication if warranted, direct notifications to the proper authorities, and record feedback, comments and recommendations. Several MS4s do not have the capability to isolate a hotline, but use either police or fire dispatch capability during off-hours to promote stormwater policy and related mitigate issues. This BMP will be further assessed.
IDD&E	4.2.0 Assessment of existing IDD&E program	Yes	In progress/ongoing
IDD&E	4.2.1 Mapping	Yes	The MS4 members of the LTSTF have developed existing storm sewer maps, which show the locations of municipal storm sewer outfalls, the conveyance system as warranted, and the names and locations of state waters that receive discharges from those outfalls, to assure compliance with the TPDES requirements. The MS4s will continue to update the mapping and assess other strategies to improve this task.
IDD&E	4.2.2 IDD&E Ordinance	Yes	The LTSTF developed a Model Illicit Discharge Elimination Ordinance for various activities to comply with the TPDES requirements. MS4s that did not have existing ordinances in place adopted the Model Ordinance, whole or in part to comply with the TPDES requirements. The existing ordinances will be reviewed to assure that additional legal authority, if needed, is incorporated into the existing language of the ordinances. Allowable and prohibited discharges will be reviewed.
IDD&E	4.2.3 Business Education	Yes	The LTSTF will continue to work together with its various partners to provide stormwater pollution prevention education materials to the commercial sectors identified as potentially significant contributors of pollutants to the MS4. Educational materials are provided to businesses through the delivery tools defined in the MCM 1 Section. Outreach items are developed to educate business staff (restaurants, groceries, auto facilities, etc.) to never dump wastes on the ground, and to help individuals understand that the storm drain connects directly to surface water. In addition, the MS4s will develop information on potential stormwater impacts from pressure-washing sidewalks, discarded shopping carts, window washing, concrete activities, and other business related activities.

Table 3.0c
BMP General Assessment (All MS4s)

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted below.</i>	
IDD&E	4.2.4 Illicit Discharge Inspections	Yes	The LTSTF will continue developing a program to conduct inspections to identify the presence and determine the source of illicit connections and illegal dumping activities. The program incorporates policy-making, response, inspections, spill response and reporting, auditing and training. The program includes training of building inspectors and other staff. Privatization is not being considered at this time.
IDD&E	4.2.5 Business Site Inspections	Yes	The LTSTF is still developing this BMP, stormwater criteria to be required of all businesses, and solicit input from existing businesses regarding feasibility and appropriateness of the new criteria. A Criteria Checklist will be developed for vehicle repair shops, auto body shops, restaurants and other similar businesses. Outreach will be conducted using MCM 1 delivery tools.
IDD&E	4.2.6 HHHW	Yes	The MS4s will continue to develop a Household Hazardous Waste Outreach Program. This BMP has been incorporated into MCM #1. An EPA Border 2020 grant was obtained by a local University, a valley-wide event was held by the University of Texas-RGV.
IDD&E	4.2.7 Business Site Inspections	Yes	The MS4s will develop a Source Investigation and Elimination program. The program in response to an illicit discharge will include investigation to identify and locate the source of such illicit discharge as soon as practicable. The program will prioritize risk, provide for reporting as required, and the program shall track all investigations and document, at a minimum, the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed. The program will allow for notification of illicit discharges outside of its jurisdiction, and will provide for corrective action procedures. An inspection program will be developed.
IDD&E	4.2.8 Hot line	Yes	A Stormwater Hotline has been developed and implemented by the majority of the MS4s to report illicit and illegal connections and discharges, illegal dumping, emergency and non-emergency incidents and other stormwater related activities. Several MS4s do not have the capability to isolate a hotline, but use either police or fire dispatch capability during off-hours to promote stormwater policy and related mitigate issues. This BMP will be further assessed.
Construction	5.2.0 Assess construction BMP programs	Yes	In progress/ongoing

**Table 3.0d
BMP General Assessment (All MS4s)**

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted below.</i>	
Construction	5.2.1 Erosion Control Ordinance	Yes	The LTSTF developed an Erosion Control Ordinance and/or an Order (non-traditional MS4s) for various activities to comply with the construction control TPDES requirements. The MS4s adopted this ordinance, or a variation of the ordinance, and/or identified an existing similar ordinance to assure compliance with the TPDES rules. The MS4s have the legal authority to develop ordinances and amend as needed. The MS4s will continue to work with local partnerships in evaluating and implementing this ordinance. This ordinance includes engineering, construction and post-construction requirements that focus on erosion control. Furthermore, the ordinance regulates construction site stormwater runoff controls that reduce pollutants in stormwater runoff. Moreover, the ordinance stipulates sanctions to ensure compliance, to the extent allowable under Federal, State or local law. Non-traditional MS4s will adopt interlocal agreements with neighboring MS4s as required under the new rules. The ordinance regulates construction activities that result in land disturbance of greater than or equal to one (1) acre pursuant to the TPDES regulations. Reduction of pollutants in stormwater discharges from construction activity disturbing less than one acre is included in the program if that construction activity is part of a larger common plan of development that would disturb one (1) acre or more. The BMP will comply with the small and large construction site definition, and other elements of the MCM#5. The MS4 legal department or attorney will be required to review any new ordinance language. The ordinance will be evaluated based on historical efforts, TCEQ guidelines and EPA sources.
Construction	5.2.2 Construction Site Plan Review	Yes	A construction site stormwater runoff control program was developed and implemented to assure adequate design, implementation, and maintenance of BMPs at construction sites within the MS4s' service areas to reduce pollutant discharges and protect water quality. The BMP will be assessed and amended as required to assure compliance with the additional requirements including but not limited to development of inspection reports, public input, to frequency of inspections, to approval process of plans, and delivery of enforcement information.
Construction	5.2.3 Site Inspection and Policy Enforcement	Yes	The LTSTF construction site stormwater runoff control program has an inspection and enforcement component. The MS4s developed or are developing procedures for site inspection and enforcement of control measures. The MS4s will continue to evaluate in house staff and identify resources to implement and improve this BMP.

Table 3.0e
BMP General Assessment (All MS4s)

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted. below.</i>	
Construction	5.2.4 Training	Yes	The LTSTF did not develop a contractor certification program, but developed a training program for the TPDES regulated community that included courses, webinars and other events solicited to and attend by contractors, engineers, and other professionals. The LTSTF will continue to develop education requirements, course curricula, continuing education classes, training, and other activities that will assure competent project managers will oversee TPDES regulated activities within construction sites within the MS4s' permitted areas. The LTSTF will continue to work with partnerships to review certification programs within the State.
Construction	5.4.5 Construction Site Waste Management	Yes	The LTSTF developed requirements for construction site operators to control waste such as discarded building materials, refueling, concrete truck washout, chemicals, litter, and sanitary waste at construction site that may cause adverse impacts to water quality.
Construction	5.4.6 Outreach	Yes	Although the LTSTF did not develop a comprehensive menu of pre-approved BMPs for use within their permitted areas, outreach material describing construction BMPs were developed and delivered as part of the outreach program.
Post Construction	6.2.0 Assess Post-Construction Program Ordinance	Yes	In progress/ongoing
Post Construction	6.2.1 Post-Construction Ordinance	Yes	The main goal of the post-construction for existing development is to limit surface runoff volumes and reduce water runoff pollution loadings. The LTSTF developed a Model ordinance during the previous permit period, worked with the MS4s in identifying post construction BMP strategies. Pursuant to the new rules, the MS4s will expand the post-construction program to include further review the Model Ordinance, expand the activities of the existing ordinance workgroup to include adoption of this ordinance, and develop an outreach program. Other ideas will be discussed (innovative methods, incentive program, offsite mitigation, etc.) that can be included in an ordinance to improve its ability to control stormwater runoff. This BMP is still under consideration.
Post Construction	6.2.2 Drainage Design Policy	Yes	The LTSTF reviewed existing drainage design policies and provided recommendations to the MS4s that included provisions for the implementation of proper erosion and sediment controls, plat recordings, post construction BMPs, housekeeping of BMPs, inspections and enforcement, contractual instruments (public and private sector) and waste management as applicable. Incorporating Green Infrastructure strategies is the main focus at this time.

Table 3.0f
BMP General Assessment (All MS4s)

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted below.</i>	
Post Construction	6.2.3 BMP Inspection and Maintenance	Yes	The LTSTF developed a model program to establish regular and routine inspections and maintenance procedures for structural post construction BMPs. The program included a Model Ordinance. The LTSTF will continue to develop this BMP, to incorporate the new rules. This BMP will assure post construction BMPs are in good working order, aesthetically pleasing, and repaired as soon as possible. This BMP is still under development and consideration.
Post Construction	6.2.4 Land Use	Yes	The LTSTF developed an awareness program on land use via the land use workgroup of the ACWP. The MS4s will continue to assess stormwater management measures of its existing land use policies and zoning requirements. The revised program will include long-term maintenance of post-construction stormwater control measures that may be included in the Model Ordinance or as a separate instrument. This BMP is still under development and consideration.
Housekeeping	7.2.0 Assess Housekeeping programs	Yes	In progress/ongoing
Housekeeping	7.2.1 O&M	Yes	This program incorporates existing routine MS4 O&M activities, hurricane preparedness activities, other activities and additional tasks needed for compliance. The program targets prevention and/or reduction of stormwater pollution from facilities such as landfills, airports, streets, roads, right-of-ways, alleys, highways, municipal parking lots, maintenance and storage yards, fleet or maintenance shops with outdoor storage areas, caliche, soil, and compost storage locations, recycling centers, disposal areas operated by the permittee, and waste transfer stations. The program regulates activities such as park and open space maintenance, fleet and building maintenance, street maintenance, new construction of municipal facilities, and stormwater system maintenance, as applicable. The program will be modified to include contractor oversight, inspections and recordkeeping.
Housekeeping	7.2.2 Street Sweeping	Yes	The MS4s improved their street sweeping programs by improving scheduling, purchasing new equipment, retrofitting existing equipment and moreover, continue to evaluate their respective street sweeping programs. Several MS4s do not have street sweeping programs (i.e. small MS4s, non-traditional MS4s), but these MS4s will continue to assess development of programs.
Housekeeping	7.2.3 Training	Yes	The employee training program's goal is to prevent or reduce pollutant runoff from municipal operations. The program uses videos, webinars, and similar tools to inform public employees of the impacts associated with illegal discharges and improper disposal of waste from municipal operations.

Table 3.0g
BMP General Assessment (All MS4s)

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted. below.</i>	
Housekeeping	7.2.4 SOP Program	Yes	<p>The LTSTF developed a general standard operation procedure (SOP) manual for municipal operations. The program developed policy, SOPs, and awareness programs that will continue to be evaluated annually. The program will be expanded to include new pollution prevention measures to comply with the new permit and may include the following examples:</p> <ul style="list-style-type: none"> (i) Replacing materials and chemicals with more environmentally benign materials or methods; (ii) Changing operations to minimize the exposure or mobilization of pollutants to prevent them from entering surface waters; and (iii) Placing barriers around or conducting runoff away from deicing chemical storage areas to prevent discharge into surface waters. <p>To assist in complying with the new permit requirements, the BMP will be improved this year. Focus group meetings will be conducted to get input from municipal employees. After the focus group meetings, existing BMPs will be modified as necessary, deficiencies will be mitigated, and improvements will be implemented to reflect input received from these groups.</p>
Housekeeping	7.2.5 Site inspections	Yes	<p>The MS4s conduct site visits to include visual inspections of various municipal operations to determine the practicality of the SOPs/BMPs and also to provide staff with a better understanding of operations.</p> <p>The SOPs/BMPs are edited based on the site visit experiences. Follow-up letters are sent to each operation after each visit noting the practices that were already in place to protect stormwater and the potential stormwater impacts that need to be corrected to achieve effective management. Recordkeeping will be added to this BMP. This BMP is still under development.</p>
Housekeeping	7.2.6 Collection and Disposal of Waste	Yes	<p>Dredge spoil, sediment, and floatables collected through the implementation of stormwater sewer system maintenance BMPs are disposed of properly. Materials collected will be tracked and evaluated. This BMP is still under development.</p>
Impaired Water Bodies BMPs	8.2.1 Source determination	Yes	<p>The LTSTF developed a workgroup to assist in developing a source determination strategy that may include review of pertinent historical literature and other similar permit/registration databases, review local health department records, find and obtain past and active local and/or regional study findings, and identify other pertinent documentation. This BMP is under development.</p>
Impaired Water Bodies BMPs	8.2.2 Impairment Program	Yes	<p>This BMP is under development. The BMPs shall, as appropriate, address the following: Sanitary Sewer Systems, OSSFs) Illicit Discharges and Dumping, Animal Sources, and Residential Education.</p>

Table 3.0h BMP General Assessment (All MS4s)			
MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
		<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted. below.</i>	
Impaired Water Bodies BMPs	8.2.3 Workgroup	Yes	This BMP is under development. The LTSTF developed a workgroup to assist in developing a source determination strategy.
Impaired Water Bodies BMPs	8.2.4 Reporting	Yes	Annual Report.
Reporting	15.2.1 Reporting	Yes	Annual Report.

Table 3.0i BMP General Assessment (Type II, III, IV and Non-traditional MS4s)				
MCM(s)	Level	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No, and explain.)	
			<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted.</i>	
IDD&E	II, III IV	10.2.1 OSSF program	Yes	This BMP is under development. The LTSTF developed a workgroup to assist in developing a source determination strategy. As part of the MS4s' IDDE Programs, this BMP will develop and implement a mitigation plan with procedures to prevent and correct any leaking on-site sewage disposal systems that discharge into the small MS4. This includes targeting residential, commercial and municipal systems. The program will work with the local Designated Representatives (DRs) to review permitting, inspection and O&M programs. The MS4s will also review legal authority instruments, attempt to identify illegal systems, and prohibit OSSFS where applicable. Outreach will be included.
IDD&E	IV	10.2.2 Identify priorities	Yes	This BMP is under development. The LTSTF developed a workgroup to assist in developing a source determination strategy. The MS4 will develop a program to identify high priority areas with a high potential to generate stormwater pollutants.
IDD&E	IV	10.2.3 Field Screening	Yes	This BMP is under development. The LTSTF developed a workgroup to assist in developing a source determination strategy. The MS4 will develop and implement a written dry weather field screening program to assist in detecting and eliminating illicit discharges to the small MS4. Dry weather field screening will include targeting priority areas, field observations, and written procedures.
IDD&E	N	10.2.4 Notification	Yes	This BMP is under development. The LTSTF developed a workgroup to assist in developing a source determination strategy. Some IDDE training will be provided.

Table 3.0j
BMP General Assessment (Type II, III, IV and Non-traditional MS4s)

MCM(s)	Level	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
			<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted.</i>	
IDD&E	III, IV	10.2.5 Source elimination	Yes	This BMP is under development. The LTSTF developed a workgroup to assist in developing a source determination strategy. Upon being notified that a reported discharge has been eliminated, the MS4 will conduct a follow-up investigation or field screening, consistent with Part III.B.2(e)(2), to verify that the discharge has been eliminated. The Source Investigation and Elimination Program shall include procedures for a site visit, follow-up investigation, enforcement, recordkeeping, and policy to seek recovery, compensation and remediation costs from responsible parties, if applicable.
Construction	III, IV	11.2.1 Inventory	Yes	This BMP is under development. The MS4s will develop an internal recordkeeping program to maintain an inventory of all permitted active public and private construction sites, that result in a total land disturbance of one or more acres or that result in a total land disturbance of less than one acre if part of a larger common plan or development or sale. Notification to the small MS4 should be made by submittal of a copy of an NOI or a small construction site notice. The MS4s will utilize their legal authority to incorporate this requirement into the MCM #3 and the SWMP in general. Proprietary Software support is under consideration.
Post Construction	IV	12.2.1 Inspection program	Yes	This BMP is under development. The MS4 will develop and implement an inspection program to ensure that all post construction stormwater control measures are operating correctly and are being maintained as required consistent with its applicable maintenance plan. The MS4 will develop an inspection reporting process. The ordinance adoption is still under consideration for this BMP.
Housekeeping	III, IV	13.2.1 Stormwater O&M	Yes	This BMP is under development. The MS4s will develop and implement an O&M program to reduce to the maximum extent practicable the collection of pollutants in catch basins and other surface drainage structures. The program will include identifying potential problem areas and developing an inspection program. Problem areas will be prioritized, and additional inspections will be contemplated.
Housekeeping	III, IV	13.2.2 Roadway O&M	Yes	This BMP is under development. The MS4s will develop and implement an O&M program that includes, if feasible and practicable, a street sweeping and cleaning program, or an equivalent BMP such as an inlet protection program, which must include an implementation schedule and a waste disposal procedure. The program will be implemented to the MEP.
Housekeeping	III, IV	13.2.3 Mapping	Yes	This BMP is under development. MS4s will enhance their existing stormwater system map to include identification and location of permittee-owned and operated facilities and stormwater controls regulated under this general permit.

Table 3.0k
BMP General Assessment (Type II, III, IV and Non-traditional MS4s)

MCM(s)	Level	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain.)	
			<i>All BMPs in the SWMP are deemed appropriate, have been evaluated as cost effective, provide dissemination of information to the MEP, and promote mitigation/minimization of discharged pollutants. Select highlights are noted.</i>	
Housekeeping	III, IV	13.2.4 SOPs	Yes	This BMP is under development. The MS4s will develop facility specific stormwater management SOPs. The SOPs will be developed in a manual format specific to each facility. Each high priority facility identified by the MS4 will be incorporated into the SOP program.
Housekeeping	III, IV	13.2.5 High Priority	Yes	This BMP is under development. The MS4 will develop and implement facility specific stormwater controls at all high priority facilities identified in Part III.B.5(c)(4)b A description of BMPs developed to comply with this requirement must be included in each facility specific SOP. SOPs will include general good housekeeping, de-icing and anti-icing material, fueling operations and vehicle maintenance, equipment and vehicle.
Housekeeping	III, IV	13.2.6 Inspections	Yes	This BMP is under development. Permittees will develop and implement an inspection program, which at a minimum must include periodic inspections of high priority permittee-owned facilities. Recordkeeping program will be included.
Housekeeping	IV	13.2.7 Pesticides, herbicides	Yes	This BMP is under development. The permittee will develop a Pesticide, Herbicide, Fertilizer Application & Management Program that will include 1) evaluation of the materials used and activities performed on public spaces owned and operated by the permittee such as parks, schools, golf courses, easements, public rights of way, and other open spaces for pollution prevention opportunities, 2) implementation of educational activities, permits, certifications, and other measures for the permittee's applicators and distributors, 3) pest management measures that encourage non-chemical solutions where feasible, 4) development of a schedule for chemical application in public spaces owned and operated by the permittee that minimize the discharge of pollutants from the application due to irrigation and expected precipitation, and 5) proper collection and disposal of the permittee's unused pesticides, herbicides, and fertilizers.
Industrial	IV	14.2.1 Identify and control	Yes	This BMP is under development. The MS4 will develop and implement an industrial source identification and pollutant control program. The program will identify and control pollutants in stormwater discharges to the small MS4 from permittee's landfills; other treatment, storage, or disposal facilities for municipal waste (for example, transfer stations and incinerators); hazardous waste treatment, storage, disposal and recovery facilities and facilities that are subject to Emergency Planning and Community Right-to-Know Act (EPCRA) Title III, Section 313; and any other industrial or commercial discharge the permittee determines are contributing a substantial pollutant loading to the small MS4. The program will include priorities and procedures for inspections and for implementing control measures for such discharges.

Table 4.0
BMP Progress (All MS4s)

MCM(s)	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain.)
Education, Outreach, and Involvement	3.2.0 Assess Existing programs	Continued with program.	N/A	N/A	No. Activities involve evaluation and assessment of BMPs
Education, Outreach, and Involvement	3.2.1 Utility Inserts and /or Mail outs	Community mailings	>100,000	Flyers, newsletters, brochures	No. BMP disseminates information.
Education, Outreach, and Involvement	3.2.2 Website	Websites	N/A	N/A	No. BMP disseminates information.
Education, Outreach, and Involvement	3.2.3 Classroom Presentations	Curriculums	>10	Presentations	No. BMP disseminates information. > 1,000 Students engaged
Education, Outreach, and Involvement	3.2.4 Stenciling	Stencils, inlet markers	>500	installations	No. BMP disseminates information.
Education, Outreach, and Involvement	3.2.5 Brochures and Videos	PSAs	N/A	N/A	No. BMP disseminates information. Program brochures are located at major buildings and offices. Storm Water PSA's on MS4 website.
Education, Outreach, and Involvement	3.2.6 Signage	Various Signs	>100	installations	No. BMP disseminates information.
Education, Outreach, and Involvement	3.2.7 Community Outreach	Curriculums	>10	Presentations	No. BMP disseminates information.
Education, Outreach, and Involvement	3.2.8 Education - General Watershed Protection Plan (non-ACWP BMP)	Curriculums	>10	Presentations	No. BMP disseminates information.

**Table 4.0a
BMP Progress (All MS4s)**

MCM(s)	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)
Education, Outreach, and Involvement	3.2.9 Public Meetings	Announcement	Annually	Meetings	No. BMP disseminates information.
Education, Outreach, and Involvement	3.2.10 Advisory Committee	Announcement	Monthly	Meetings	Continued membership with LRGV Storm Water Task Force
Education, Outreach, and Involvement	3.2.11 Hotline	Continued with program.		In progress/ongoing	No. BMP disseminates information.
IDD&E	4.2.0 Assessment of existing IDD&E program	Continued with Program.		In progress/ongoing	No. Activities involve evaluation and assessment of BMPs
IDD&E	4.2.1 Mapping	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
IDD&E	4.2.2 IDD&E Ordinance	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
IDD&E	4.2.3 Business Education	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
IDD&E	4.2.4 Illicit Discharge Inspections	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.
IDD&E	4.2.5 Business Site Inspections	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.
IDD&E	4.2.6 HHHW	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
IDD&E	4.2.7 Business Site Inspections	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.
IDD&E	4.2.8 Hot line	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Construction	5.2.0 Assess construction BMP programs	Continued with Program.		In progress/ongoing	No. BMP disseminates information.

**Table 4.0b
BMP Progress (All MS4s)**

MCM(s)	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain.)
Construction	5.2.1 Erosion Control Ordinance	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Construction	5.2.2 Construction Site Plan Review	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Construction	5.2.3 Site Inspection and Policy	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Construction	5.2.4 Training	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Construction	5.4.5 Construction Site Waste Management	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.
Construction	5.4.6 Outreach	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Post Construction	6.2.0 Assess Post-Construction	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Post Construction	6.2.1 Post-Construction	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Post Construction	6.2.2 Drainage Design Policy	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Post Construction	6.2.3 BMP Inspection and	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Post Construction	6.2.4 Land Use	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Housekeeping	7.2.0 Assess Housekeeping	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Housekeeping	7.2.1 O&M	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.
Housekeeping	7.2.2 Street Sweeping	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste..
Housekeeping	7.2.3 Training	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Housekeeping	7.2.4 SOP Program	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Housekeeping	7.2.5 Site inspections	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.

**Table 4.0c
BMP Progress (All MS4s)**

MCM(s)	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain.)
Housekeeping	7.2.6 Collection and Disposal of	Continued with Program.		In progress/ongoing	Yes. Reduces solid waste.
Impaired Water Bodies BMPs	8.2.1 Source determination	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Impaired Water Bodies BMPs	8.2.2 Impairment Program	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Impaired Water Bodies BMPs	8.2.3 Workgroup	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Impaired Water Bodies BMPs	8.2.4 Reporting	Continued with Program.		In progress/ongoing	No. BMP disseminates information.
Reporting	15.2.1 Reporting	Annual Report		In progress/ongoing	No. BMP disseminates information.

Table 4.0d
BMP Progress (Type II, III, IV and Non-traditional MS4s)

MCM(s)	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain.) (completed, in progress, not started)
IDD&E	II, III IV	10.2.1 OSSF program	Continued with Program.		No. BMP disseminates information.
IDD&E	IV	10.2.2 Identify priorities	Continued with Program.		No. BMP disseminates information.
IDD&E	IV	10.2.3 Field Screening	Continued with Program.		No. BMP disseminates information.
IDD&E	N	10.2.4 Notification	Continued with Program.		No. BMP disseminates information.
IDD&E	III, IV	10.2.5 Source elimination	Continued with Program.		No. BMP disseminates information.
Construction	III, IV	11.2.1 Inventory	Continued with Program.		No. BMP disseminates information.
Post Construction	IV	12.2.1 Inspection program	Continued with Program.		No. BMP disseminates information.
Housekeeping	III, IV	13.2.1 Stormwater O&M	Continued with Program.		Yes. Reduces solid waste.
Housekeeping	III, IV	13.2.2 Roadway O&M	Continued with Program.		No. BMP disseminates information.
Housekeeping	III, IV	13.2.3 Mapping	Continued with Program.		No. BMP disseminates information.
Housekeeping	III, IV	13.2.4 SOPs	Continued with Program.		No. BMP disseminates information.
Housekeeping	III, IV	13.2.5 High Priority	Continued with Program.		No. BMP disseminates information.
Housekeeping	III, IV	13.2.6 Inspections	Continued with Program.		Yes. Reduces solid waste.
Housekeeping	IV	13.2.7 Pesticides, herbicides	Continued with Program.		No. BMP disseminates information.
Industrial	IV	14.2.1 Identify and control	Continued with Program.		No. BMP disseminates information.

**Table 5.0
Measurable Goals Status (All MS4s)**

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain.
Outreach, Education and Participation	<p align="center">3.2.0 Assess Programs</p> <p>Permittees began to assess program elements that were described in the previous permit to continue reducing the discharge of pollutants from the MS4 to the MEP. The program will, at a minimum define the goals and objectives of the program based on high priority community-wide issues, identify the target audience(s), develop or utilize appropriate educational materials, and determine cost effective and practical methods and procedures.</p>	<p align="center">Met Goal and ongoing. Additional reporting after this permit year.</p>
Outreach, Education and Participation	<p align="center">3.2.1 Utility Inserts and/or Mail outs:</p> <p>Outreach materials in the forms of small brochures, informative handouts or fact sheets will continue to be distributed with municipal water utility bills and/or mailouts as budget allows. This BMP program was expanded to include a self-service area located in a public facility (library, city hall, main office, etc.) where community members, visitors, students, and other individuals can obtain outreach materials like brochures, announcements and factsheets. Information includes various topics like waste oil disposal, use of pesticides and fertilizers on landscaping, household hazardous waste, water quality, and the SWMP in general. This program uses existing outreach materials developed by the LTSTF, TCEQ, EPA and other organizations.</p>	<p align="center">Met Goal</p>
Outreach, Education and Participation	<p align="center">3.2.2 Website</p> <p align="center">All websites were developed and/or enhanced</p>	<p align="center">Met Goal</p>
Outreach, Education and Participation	<p align="center">3.2.3 Classroom Outreach</p> <p>A curriculum with associated materials and training is available and advertised to classroom teachers from various ISDs located within jurisdictions of MS4 stakeholders. Program materials include curriculum on water quality and water conservation, stormwater pollution prevention, and promotion of the SWMP. Classroom visits are conducted by the MS4 that include guest speakers. Program has been successful and continues every year.</p>	<p align="center">Met Goal</p>

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Outreach, Education and Participation	<p style="text-align: center;">3.2.4 Stenciling</p> <p>A successful storm drain stenciling program was initiated by the LTSTF during the last permit period. Using grant funding and local funding local government staff provided stormwater education programs and facilitated storm drain stenciling activities with youth and citizens' organizations, and as part of their stormwater management program. The LTSTF continues to facilitate the development of partnerships with local youth service groups to perform a significant portion of the storm drain stenciling work as needed. This year work primarily focused on planning, alternatives, cost effective options, and grant opportunities. Additional field programs will commence next year and subsequent years.</p>	Met Goal
Outreach, Education and Participation	<p style="text-align: center;">3.2.5 Brochures and Videos</p> <p>The LTSTF has produced various brochures during the previous permit period and successfully continues to deliver to the region. Topics include soil erosion prevention, rain harvesting, low impact development, and Arroyo Colorado watershed protection topics. Additional videos were created in 2015 and 2018, and can be viewed on our websites.</p>	Met goal
Outreach, Education and Participation	<p style="text-align: center;">3.2.6 Signage</p> <p>Stormwater pollution prevention signs continue to be designed, produced and installed along major intersections within the MS4 membership of the LTSTF, at billboards, at constructions sites and activities/events. The signs bear the logos from the LTSTF, the ACWP and the MS4.</p>	Met Goal
Outreach, Education and Participation	<p style="text-align: center;">3.2.7 Community Outreach:</p> <p>The LTSTF provides educational and outreach materials to the community, including brochures, fact sheets and handouts. These materials are made available at City Halls, and throughout public-owned facilities. Materials are made available to developers, businesses, and contractors during the planning and permitting processes. The LTSTF promotes its stormwater pollution prevention outreach program at various annual community events. Booths, brochures, children- friendly materials, and other similar approaches are used. The LTSTF has developed partnerships with various regional entities and coordinates an annual conference that promotes the SWMPs of the region and the ACWPP. This highly successful conference is held annually at South Padre Island. This BMP will continue to be developed.</p>	Met Goal

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Outreach, Education and Participation	<p style="text-align: center;">3.2.8 Education</p> <p>The LTSTF will continue to work closely with the ACWP to implement this BMP. The impairment of the Arroyo Colorado is of great concern to our region.</p>	Met Goal
Outreach, Education and Participation	<p style="text-align: center;">3.2.9 Public Meetings</p> <p>Annual public meetings are conducted to provide citizens with the opportunity to discuss various viewpoints and provide input concerning stormwater quality issues. Meetings are held by individual MS4 permittees. There are no regional meetings held at this time.</p>	Met Goal
Outreach, Education and Participation	<p style="text-align: center;">3.2.10 Advisory Workgroup</p> <p>The Task Force organization serves as the advisory workgroup for the MS4 partners. The group meets frequently.</p>	Met Goal
Outreach, Education and Participation	<p style="text-align: center;">3.2.11 Hotline</p> <p>A Stormwater Hotline has been developed and implemented by the majority of the MS4s to promote outreach, enforce policy and to facilitate public involvement. Those with limited resources utilize the Police and Fire departments dispatchers and their after-hours numbers.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.0 Assess IDD&E Program</p> <p>Permittees began to assess program elements that were described in the previous permit to continue reducing the discharge of pollutants from the MS4 to the MEP. The program will, at a minimum define the goals and objectives of the program based on high priority community-wide issues, identify the target area(s), develop or utilize appropriate educational materials, and determine cost effective and practical methods and procedures.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.1 Mapping</p> <p>The MS4 members of the LTSTF have developed existing storm sewer maps, which show the locations of municipal storm sewer outfalls, the conveyance system as warranted, and the names and locations of state waters that receive discharges from those outfalls, to assure compliance with the TPDES requirements. The MS4s will continue to update the mapping and assess other strategies to improve this task.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.2 Ordinance</p> <p>The LTSTF developed a Model Illicit Discharge Elimination Ordinance for various activities to comply with the TPDES requirements. MS4s that did not have existing ordinances in place adopted the Model Ordinance, whole or in part to comply with the TPDES requirements. Existing ordinances are being reviewed to assure that additional legal authority, if needed, is incorporated into the existing language of the ordinances. Allowable and prohibited discharges will be reviewed. All MS4s will have ordinances in place by Year 5 of the Permit period.</p>	Met Goal

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
IDD&E	<p style="text-align: center;">4.2.3 Business Education</p> <p>The LTSTF continues to work together with its various partners to provide stormwater pollution prevention education materials to the commercial sectors.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.4 Inspections</p> <p>The LTSTF will continue developing a program to conduct inspections to identify the presence and determine the source of illicit connections/illegal dumping activities. Program will incorporate policy-making, response, inspections, spill response/ reporting, auditing and training. The program will include training of building inspectors and other staff. If necessary, the MS4s will entertain privatization of this BMP, in part, or in its entirety. This permit period included planning, training, and budget reviews.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.5 Business Inspections</p> <p>The LTSTF will continue to develop stormwater criteria to be required of all businesses and solicit input from existing businesses regarding feasibility and appropriateness of the new criteria. This year, the Task Force focused on outreach and planning.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.6 HHHW</p> <p>The MS4s will continue to develop a Household Hazardous Waste Outreach Program. The City will seek partnerships with the ISDs and the ACWP to possibly expand the program. Grant opportunities have allowed the Task Force to conduct various regional events. E-waste is also collected.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.7 Source I&E</p> <p>The program will prioritize risk, provide for reporting as required, and the program shall track all investigations and document, at a minimum, the date(s) the illicit discharge was observed; the results of the investigation; any follow-up of the investigation; and the date the investigation was closed. The program will allow for notification of illicit discharges outside of its jurisdiction and will provide for corrective action procedures. An inspection program will be developed. This year the Task Force focused on discussion and planning.</p>	Met Goal
IDD&E	<p style="text-align: center;">4.2.8 Hotline</p> <p>A Stormwater Hotline has been developed and implemented by the majority of the MS4s to report illicit and illegal connections and discharges, illegal dumping, emergency and non-emergency incidents and other stormwater related activities.</p>	Met Goal

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Construction	<p style="text-align: center;">5.2.0 Assessment of Program</p> Permittees continue to assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met Goal
Construction	<p style="text-align: center;">5.2.1 Ordinance</p> Permittees continue to assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met Goal
Construction	<p style="text-align: center;">5.2.2 Construction Plan Oversight</p> A construction site stormwater runoff control program was developed and implemented to assure adequate design, implementation, and maintenance of BMPs at construction sites within the MS4s' service areas to reduce pollutant discharges and protect water quality. Oversight, training and outreach are progressing. This year, a regional approach is under assessment. The program will be fully developed by Year 5.	Met Goal
Construction	<p style="text-align: center;">5.2.3 Site inspections</p> The LTSTF construction site stormwater runoff control program has an inspection/enforcement component. The MS4s developed or are developing procedures for site inspection and enforcement of control measures. The MS4s will continue to evaluate staff and identify resources to implement and improve this BMP. The MS4s are considering privatization of this BMP. The program will be fully developed by Year 5.	Met Goal
Construction	<p style="text-align: center;">5.2.4 Training</p> The LTSTF did not develop a contractor certification program but developed a training program for the TPDES regulated community that included courses, webinars and other events solicited to and attend by contractors, engineers, and other professionals. The LTSTF will continue to develop education requirements, course curricula, continuing education classes, training, and other activities that will assure competent project managers will oversee TPDES regulated activities within construction sites within the MS4s' permitted areas. The LTSTF will continue to work with partnerships to review certification programs within the State. Task Force will begin offering training and fully implement this BMP by Year 5.	Met Goal

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Construction	<p style="text-align: center;">5.2.5 Construction Waste Management</p> <p>The LTSTF developed requirements for construction site operators to control waste such as discarded building materials, refueling, concrete truck washout, chemicals, litter, and sanitary waste at construction site that may cause adverse impacts to water quality. Task Force began offering training during Year 2 and fully implement this BMP by Year 5.</p>	Met Goal
Construction	<p style="text-align: center;">5.2.6 Outreach</p> <p>Outreach material describing construction BMPs were developed and delivered as part of the outreach program.</p>	Met Goal
Post Construction	<p style="text-align: center;">6.2.0 Assess Post Construction Program</p> <p>Permittees will assess program elements that were described in the previous permit, modify as necessary, and develop and implement new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.</p>	Met Goal
Post Construction	<p style="text-align: center;">6.2.1 Ordinance</p> <p>Pursuant to the new rules, the MS4s will expand the post-construction program to include further review the Model Ordinance, expand the activities of the existing ordinance workgroup to include adoption of this ordinance, and develop an outreach program (new activity). Other ideas will be discussed (innovative methods, incentive program, offsite mitigation, etc.) that can be included in an ordinance to improve its ability to control stormwater runoff. The Task Force is developing discussion, workshops and promoting innovation to assure buy-in from the stakeholders.</p>	Met Goal
Post Construction	<p style="text-align: center;">6.2.2 Drainage Policy</p> <p>The LTSTF reviewed existing drainage design policies and provided recommendations to the MS4s that included provisions for the implementation of proper erosion and sediment controls, plat recordings, post construction BMPs, housekeeping of BMPs, inspections and enforcement, contractual instruments (public and private sector) and waste management as applicable. Additional planning is recommended, more outreach proposed and implementation is Year 5.</p>	Met Goal
Post Construction	<p style="text-align: center;">6.2.3 BMP Maintenance</p> <p>The LTSTF is developing a model program to establish regular and routine inspections and maintenance procedures for structural post construction BMPs. The program includes a Model Ordinance. The LTSTF will continue to develop this BMP, to incorporate the new rules. This BMP will assure post construction BMPs are in good working order, aesthetically pleasing, and repaired as soon as possible. Full implementation anticipated by Year 5.</p>	Met Goal

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Post Construction	<p style="text-align: center;">6.2.4 Land Use</p> <p>The LTSTF developed an awareness program on land use via the land use workgroup of the ACWP. The MS4s will continue to access stormwater management measures of its existing land use policies and zoning requirements. The revised program will include long-term maintenance of post-construction stormwater control measures that may be included in the Model Ordinance or as a separate instrument. Recording (at the County, etc.) of activities as required by the new permit will be included in this program. Full implementation anticipated by Year 5.</p>	Met Goal
Housekeeping	<p style="text-align: center;">7.2.0 Assessment of Housekeeping Programs</p> <p>Permittees assessed program elements that were described in the previous permit, modified as necessary, and developed and implemented new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.</p>	Met Goal
Housekeeping	<p style="text-align: center;">7.2.1 O&M</p> <p>Permittees assessed program elements that were described in the previous permit, modified as necessary, and developed and implemented new elements, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.</p>	Met Goal
Housekeeping	<p style="text-align: center;">7.2.2 Street Sweeping</p> <p>The MS4s improved their street sweeping programs by improving scheduling, purchasing new equipment, retrofitting existing equipment and moreover, continue to evaluate their respective street sweeping programs. Several MS4s do not have street sweeping programs (i.e. small MS4s, non-traditional MS4s), but these MS4s will continue to assess development of programs. Please see Section 13.2.2 for additional activities related to street sweeping as required for Type III and Type IV MS4s.</p>	Met Goal
Housekeeping	<p style="text-align: center;">7.2.3 Training</p> <p>The program uses videos, webinars, and similar tools to inform public employees of the impacts associated with illegal discharges and improper disposal of waste from municipal operations.</p>	Met Goal
Housekeeping	<p style="text-align: center;">7.2.4 SOPs</p> <p>The LTSTF developed a general standard operation procedure (SOP) manual for municipal operations. The program developed policy, SOPs, and awareness programs that will continue to be evaluated annually. The program will be expanded to include new pollution prevention measures to comply with the new permit. We anticipate full implementation by Year 5.</p>	Met Goal

MCM(s)	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Housekeeping	<p style="text-align: center;">7.2.5 Inspections</p> <p>The MS4s plans to conduct site visits to include visual inspections of various municipal operations to determine the practicality of the SOPs/BMPs and also to provide staff with a better understanding of operations. This year the Task Force focused on training, planning and budgeting.</p>	Met Goal
Housekeeping	<p style="text-align: center;">7.2.6 Collection of Waste</p> <p>Dredge spoil, sediment, and floatables collected through the implementation of stormwater sewer system maintenance BMPs will be disposed of properly. Materials collected will be tracked and evaluated. We anticipate full implementation by Year 5. This year the Task Force focused on training, planning and budgeting.</p>	Met Goal
Bacteria	<p style="text-align: center;">8.2.1 Source Determination</p> <p>The LTSTF membership will prepare an Impaired Water Body BMP program to meet the requirements of the new MS4 TPDES requirements pursuant to Part II Section D and (b) (i.e. <u>Discharges Directly to Water Quality Impaired Water Bodies without an Approved TMDL</u>) and Part II Section D 4 (a) (5) (i.e. Impairment for Bacteria). The source determination program has not been implemented, a workgroup was developed and is currently meeting actively to achieve this BMP. The Task Force is active with the Arroyo Colorado Watershed Partnership (Bacteria related projects) and various LID demonstration projects. No additional BMPs are proposed at this time.</p>	Partially Met Goal
Bacteria	<p style="text-align: center;">8.2.2 Impairment Program</p> <p>A workgroup was developed and is currently meeting actively to achieve this BMP. The Task Force is active with the Arroyo Colorado Watershed Partnership (Bacteria related projects) and various LID demonstration projects. No additional BMPs are proposed at this time.</p>	Met Goal
Bacteria	<p style="text-align: center;">8.2.3 Workgroup</p> <p>A workgroup was developed and is currently meeting actively to achieve this BMP. The Task Force is active with the Arroyo Colorado Watershed Partnership (Bacteria related projects) and various LID demonstration projects. No additional BMPs are proposed at this time.</p>	Met Goal
Bacteria	<p style="text-align: center;">8.2.3 Reporting</p> <p>Annual reporting.</p>	Met Goal

**Table 5.0h
Measurable Goals Status (Type II, III, IV and non-traditional MS4s)**

MCM(s)	Level	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
IDD&E	II, III and IV	10.2.1 OSSF Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met Goal and ongoing. Additional reporting after this permit year.
IDD&E	IV	10.2.2 Identify Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met Goal and ongoing. Additional reporting after this permit year.
IDD&E	IV	10.2.3 Field Screening Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met Goal and ongoing. Additional reporting after this permit year.
IDD&E	N	10.2.4 Notification Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP. .	Met Goal and ongoing. Additional reporting after this permit year.
IDD&E	III, IV	10.2.5 Source Elimination Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met Goal and ongoing. Additional reporting after this permit year.
Construction	III, IV	11.2.1 Inventory Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Post Construction	IV	12.2.1 Inspection Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal

**Table 5.0i
Measurable Goals Status (Type II, III, IV and non-traditional MS4s)**

MCM(s)	Level	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Housekeeping	III, IV	<p align="center">13.2.1 Storm O&M</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Housekeeping	III, IV	<p align="center">13.2.2 Roadway O&M</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Housekeeping	III, IV	<p align="center">13.2.3 Mapping</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Housekeeping	III, IV	<p align="center">13.2.4 SOPs</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Housekeeping	III, IV	<p align="center">13.2.5 High Priority</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Housekeeping	III, IV	<p align="center">13.2.6 Inspections</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal
Housekeeping	IV	<p align="center">13.2.7 Pesticides</p> Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Met goal

**Table 5.0j
Measurable Goals Status (Type II, III, IV and non-traditional MS4s)**

MCM(s)	Level	Measurable Goal(s) (Based on concept of Maximum Extent Practical)	Explain progress toward goal or how goal was achieved If goal was not accomplished please explain
Industrial	IV	13.2.7 Inspections Permittees assessed program elements that were described in the previous permit, as necessary, to continue reducing the discharge of pollutants from the MS4 to the MEP.	Partially Met goal