



November 14, 2018

**CERTIFIED MAIL – 7017 2400 0000 4473 2034  
RETURN RECEIPT REQUESTED**

Texas Commission on Environmental Quality  
Water Quality-Region 13  
14250 Judson Rd  
San Antonio, TX 78233-4480

Re: Phase II MS4 Annual Report Transmittal for the City of New Braunfels  
TPDES Permit Authorization: **TXR040469**

Dear Water Quality Section Manager:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040469 for the City of New Braunfels.

The annual report is for Year 4 with the reporting period beginning October 1<sup>st</sup>, 2017 and ending September 30<sup>th</sup>, 2018.

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

As required by the general permit, a copy of this submittal has also been mailed TCEQ's Central Texas Area office in Austin, Texas.

If you have any questions please contact Mark Enders, Watershed Program Manager, at (830) 221-4639.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Enders", is written over a horizontal line.

Mark Enders  
Watershed Program Manager  
City of New Braunfels

# Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number **TXR040000**

## A. General Information

Authorization Number: TXR040469

Reporting Year: 4

Annual Reporting Year Option Selected by MS4: Fiscal Year

Fiscal Year: 2017/2018, Last day of fiscal year: September 30<sup>th</sup>

Reporting period beginning date: October 1<sup>st</sup>, 2017

Reporting period end date: September 30<sup>th</sup>, 2018

MS4 Operator Level: Level 3

Name of MS4: City of New Braunfels

Contact Name: Mark Enders

Telephone Number: (830) 221-4020

Mailing Address: 550 Landa Street, New Braunfels, TX 78130

E-mail Address: menders@nbtexas.org

A copy of the annual report was submitted to the TCEQ Region YES X NO       
(Region the annual report was submitted: TCEQ Region 13)

## 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.):

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	<b>X</b>		
Permittee is currently in compliance with recordkeeping and reporting requirements.	<b>X</b>		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.)	<b>X</b>		

<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>
2: Illicit Discharge Detection and Elimination	Detection and Elimination Program	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.
2: Illicit Discharge Detection and Elimination	Field Staff Training	Yes, increasing field staff awareness enhances the ability of staff to detect, eliminate, and respond to illicit discharges.
2: Illicit Discharge Detection and Elimination	Public Reporting of Illicit Discharges and Spills	Yes, the ability to receive reports from the public increases the probability of discovering illicit discharges and speeds up the elimination the discharge.
2: Illicit Discharge Detection and Elimination	Illicit Discharge Ordinance	Yes, the City's illicit discharge ordinance provides the City with the legal authority to prohibit and eliminate illicit discharges and connections, reducing the amount of pollutants entering stormwater.
2: Illicit Discharge Detection and Elimination	River Clean-up	Yes, river clean-up events and regularly scheduled riparian maintenance remove trash and other pollutants from watershed areas, reducing the amount of litter and debris reaching waterways.
3: Construction Site Stormwater Runoff Control	Construction Site Inspection Program	Yes, inspection of active construction sites helps identify issues and ensures that adequate erosion, sediment, pollution controls and other SWPPP activities are in place and functioning, thereby reducing the potential for sediment and pollutant discharges.
3: Construction Site Stormwater Runoff Control	Construction Site Inventory	Yes, an inventory of active construction sites is imperative to guide, schedule and prioritize routine stormwater construction management inspections aimed at preventing the discharge of pollutants from construction sites
3: Construction Site Stormwater Runoff Control	Construction Site Waste Control Ordinance	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>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>
5: Pollution Prevention and Good Housekeeping for Municipal Operations	Street Sweeping	Yes, the City's street sweeping program results in the removal of sediment, debris, and 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.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Mapping of Facilities and Inventory Control	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.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Municipal Operations and Facility Survey	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.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Facility Inspection Program	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.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Outdoor Storage	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.
5: Pollution Prevention & Good Housekeeping for Municipal Operations	Fleet and Equipment Maintenance	Yes, routine inspection of the fleet maintenance facility ensures that good housekeeping, spill prevention, and protection measures are being implemented.

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. You may use the table (**See Example 2 in instructions**):

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Units</b>	<b>Does BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No, and explain.)</b>
1	Volunteer Litter Clean-Ups	Volume of trash/ litter collected	Pounds	Yes, the collection of litter from waterways, drainages and greenways adjacent to waterways results in the direct reduction of trash and litter in the storm drain system and rivers/ creeks.
2	IDDE program dry weather screening	Stormwater Outfalls	Inspections	Yes, once an illicit discharge or pollutant release is observed, immediate action is taken to track the source, eliminate the discharge and remediate the pollution.
3	Construction site inspections	Observations at active construction sites	Inspections	Yes, inspection of active construction sites allows City staff to assess sites for adequate stormwater pollution prevention controls. Sites with inadequate controls are required to repair and/ or install additional controls which helps to minimize sediment and construction-related pollutant discharges.
4	Post-construction BMP inspections	Post-construction BMPs	Inspections	Yes, inspection of permanent stormwater controls ensures proper operation and functionality of the controls, therefore effectively reducing pollutant discharges.
5	Stormwater drainage system inspections	Stormwater structures	Inspections	Yes, the City's Streets and Drainage crews inspect stormwater structures, including drainage inlets and channels, to remove blockages, look for signs of dumping and assess for any other potential issues.
5	Street Sweeping	Observation of sediment and material removed from streets	Pounds	Yes, the volume of sediment, auto debris, and misc. debris swept and removed from roadways reduces the amount of material available to be washed into storm drain system and receiving waters by stormwater runoff.

<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	Events and meetings conducted with citizen watch groups (PE-2)	<p>Met goal.</p> <p>The City hosted one Watershed Advisory Committee meeting in Year 4 that was held on September 06, 2018.</p>
1	Record and document WQ pollution and illegal dumping incidents reported by citizens (PE-2)	<p>Met goal.</p> <p>Ten (10) water quality concerns were received by citizens in Year 4. Each of these concerns were inspected, documented, and followed up on.</p>
1	Sponsor, co-sponsor, or participate in annual stream clean-up events (PE-2)	<p>Met goal.</p> <p>The City co-sponsored the 6<sup>th</sup> Annual Geronimo and Alligator Creek Clean-Up event held on April 7<sup>th</sup>, 2018. City staff volunteered and participated in the event coordinating with volunteers to clean-up a portion of Alligator Creek near the New Braunfels Airport. The City provided roll-off trash dumpsters for the event.</p> <p>The City hosted the Second Annual Dos Rios Watershed Clean-Up event on October 13, 2018 (although the event took place outside of the Year 4 it was originally scheduled for September 15<sup>th</sup>, 2018 and was postponed due to inclement weather). Approximately 130 volunteers collected litter at 10 locations along rivers and creeks in New Braunfels. 500 lbs. of trash and 3 tires were collected and disposed of.</p>
1	Collaborate with watershed-based organizations (PE-3)	<p>Met goal.</p> <p>The City continued to work with watershed-based organizations in Year 4. The City collaborated with the Texas Stream Team and the Alligator Geronimo Creek Watershed Partnership in Year 4. The City continued its participation in the Edwards Aquifer Habitat Conservation Plan program and continued to work with the Guadalupe Blanco River Authority. The City also regularly attended and presented at Chamber of Commerce Natural Resource Committee meetings.</p> <p>The City collaborated with MS4 Stormwater Management personnel from the City of Kyle, City of San Marcos, and Texas State University. Meetings were held every other week to combine efforts, share experiences, and provide support within the group to improve each entity's MS4 program. The collaboration group planned and held the inaugural Texas</p>

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved</b> <b>If goal was not accomplished please explain</b>
		trash and 60 lbs. of recyclables over the course of 8 separate group clean-up activities.
1	Annually sponsor an Arbor Day/ reforestation event. (PE-6)	Met goal.  The City's annual Arbor Day event was held on October 21, 2017 in Landa Park. A tree planting demonstration led by Mark Kroeze, Regional Urban Forester for Texas A&M Forest Service was given, and 700 one-gallon containerized trees of 13 different species were given away to approximately 200 community members.
2	Develop MS4 Outfall Map (ID-1)	Met goal.  A comprehensive MS4 system map was completed in Year 2 and was continuously updated throughout Year 4 with new stormwater infrastructure. The map includes outfalls, drainage channels, retention ponds, and drainage inlets within City limits. All collected field data was updated to the City's GIS server and is included in an ArcGIS map. The map is used to guide the IDDE Dry Weather Screening program and the post-construction BMP inspection program.
2	Develop policies and procedures to ensure GIS data is acquired for new development (ID-1)	Met goal.  New stormwater infrastructure (i.e. drainage inlets, outfalls, channels, basins and water quality controls) is continuing to be mapped as the construction of new stormwater infrastructure is completed. The City has developed Standard Operating Procedures (SOP) for mapping new infrastructure.
2	Develop and implement IDDE program (ID-2)	Met goal.  In Year 3, the City finalized the development of SOPs for the IDDE program. The City began implementation of the IDDE program in Year 3 and continued to implement the program throughout Year 4.
2	Perform dry weather screening to detect potential illicit discharges (ID-2)	Met goal.  The dry weather screening program was implemented in Year 3 and was continued in Year 4. 337 outfalls were screened during dry weather conditions during the FY 2017/2018 reporting year.

<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>
3	Develop construction site inspection procedures and forms (CS-1)	<p>Met goal.</p> <p>The City has established SOPs that guide construction stormwater management inspections. A standardized field inspection report is utilized to record inspection findings. All inspection records are retained on the City's server.</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 sites throughout Year 4. 743 construction stormwater inspections were conducted between Oct 1<sup>st</sup>, 2017 and Sept 30<sup>th</sup>, 2018.</p>
3	Provide annual training to applicable City employees (CS-1)	<p>Met goal.</p> <p>Watershed Management staff (3) attended the 2018 TCEQ Stormwater Conference on September 10-11, 2018 which featured training sessions and presentations regarding stormwater management and state and nationwide regulations. The City continued to build capacity of City inspectors to evaluate construction sites for effective stormwater controls.</p> <p>A construction stormwater management training workshop was given to City of New Braunfels staff (20 employees) in the Streets and Drainage, Parks and Recreation, and Engineering Inspection Departments as part of the 2018 Texas Regional Stormwater Conference. Sign-in sheet and training materials have been retained.</p>
3	Compile, document, and report construction site inventory. Report number of construction stormwater permits and NOIs (CS-2)	<p>Met goal.</p> <p>City staff continues to document and track all construction sites &lt;1 acre.</p> <p>Permit records from the City's Engineering and Building Departments are used, along with submitted NOIs &amp; CSNs, to identify and document active construction projects. Active sites are also identified and documented during routine field visits.</p> <p>All active construction sites &gt;1 acre are tracked in software that maintains a construction site inventory and is used to guide and schedule routine inspections.</p>



<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>
		two types of pervious pavement, a vegetated swale, and rainwater harvesting system.
4	Review and revise water quality protection measures as part of the City's Drainage Criteria Manual (DCM). Implement revised DCM (PC-2)	Met goal.  The City's Drainage and Erosion Control Design Manual (DCM) was finalized and adopted in Year 2. The new DCM became effective on July 1, 2016. The DCM includes water quality control requirements for areas of new development. The water quality control requirements took effect on January 1, 2017, requiring that any new Type 3 development (adding >5,000 sq. ft of new impervious cover) platted after the effective date implement permanent water quality controls to treat the first 1/2" of runoff. These requirements were continued into Permit Year 4.
4	Develop and implement program to inspect post-construction control measures/ BMPs (PC-3)	Met goal.  Inspections of post-construction control measures began in Year 3 and have continued throughout Year 4. As of January 1, 2017, new Type 3 development and redevelopment adding 5,000 sq. ft. of new impervious cover requires installation of permanent water quality controls.  Standard Operating Procedures were developed for post-construction BMP inspections. A master list of permanent stormwater controls within city limits and a field report have been developed to guide inspections. 284 post-construction BMP inspections were performed in Year 4.  Notification is sent to owners and operators of stormwater controls that are found to be undermaintained and/ or deficient.

MCM(s)	Measurable Goal(s)	<p align="center"><b>Explain progress toward goal or how goal was achieved</b></p> <p align="center"><b>If goal was not accomplished please explain</b></p>
		<p>and Recreation Advisory Board and City Council on March 27, 2017. The plan includes the establishment of a low intensity park with expanded riparian buffer areas. Funding for this park plan is included on a short-list of projects on a City-wide 2019 bond.</p> <p>Additional no mow-zones were established in Year 3 along the Comal River, specifically along portions of the Old Channel that runs through portions of the Landa Park Golf Course. In addition, efforts have been made to remove non-native riparian plant species and expand riparian buffer areas using native plants. The no-mow zones were continued to be maintained as buffer areas in Year 4.</p>
5	Review and revise, as needed, existing street sweeping operations and procedures. Investigate opportunities to increase the effectiveness of the program to reduce pollutants (GH-1)	<p>Met goal.</p> <p>The City's street sweeping program was evaluated again in Year 4. It was determined the City's Street Sweeping program remains effective at removing sediment and debris from City streets, thus preventing them from reaching surface waters. The street sweeping program, including a street sweeping map, has been documented.</p>
5	Develop street sweeper waste disposal program (GH-1)	<p>Met goal.</p> <p>The street sweeping program consists of the following:          -The City owns and operates three regenerative-air street sweeping units. Two sweeper units are run 5 hours/ day, 5 days/ week. 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>
5	Develop a map identifying CONB-owned and operated facilities and stormwater controls (GH-2)	<p>Met goal.</p> <p>An ArcGIS map has been developed to document the locations of all City properties and facilities. A stormwater control map was completed in Year 3 to show City-owned controls. The map was reviewed in Year 4, no updates to the map were required.</p>

MCM(s)	Measurable Goal(s)	<p align="center"><b>Explain progress toward goal or how goal was achieved</b></p> <p align="center"><b>If goal was not accomplished please explain</b></p>
		<p>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 does not currently own any structural water quality controls such as water quality treatment basins and stormwater filtration units. There are plans to construct structural, water quality controls in Year 5. Once completed, City Staff will inspect, maintain, and track its structural water quality controls.</p>
5	Spill response procedures and clean-up training to applicable City employees (GH-10)	<p>Met goal.</p> <p>A spill clean-up training was given to City of New Braunfels staff (20 employees) in the Streets and Drainage, Parks and Recreation, and Engineering Inspection Departments as part of a Good Housekeeping presentation at the 2018 Texas Regional Stormwater Conference. Sign-in sheet and training materials have been retained.</p>
5	Provide spill response kits at applicable City facilities (GH-10)	<p>Met goal.</p> <p>Spill response kits were purchased in Year 1 for City facilities and vehicles. Applicable departments still retain an adequate supply of spill kits as of permit Year 4.</p>
5	Provide and document MS4-related training to City staff (GH-11)	<p>In progress.</p> <p>City staff and management is continuing to be educated and informed on stormwater management and water quality initiatives.</p>
5	Record and report the amount of green waste recycled (GH-12)	<p>Met goal.</p> <p>The City continued to implement a green waste recycling program. There was approximately 4,600 tons of green waste diverted from the landfill and sent to Comal County Recycling center to be mulched in permit Year 4.</p>
5	Develop methods to promote green waste recycling and mgmt (GH-12)	<p>Met goal.</p> <p>Green waste recycling is promoted via the City's website and in the "Making the Most of Our Resources" guide which is distributed quarterly as an insert in the local Herald-Zeitung newspaper. The City's green waste webpage includes information on the residential green waste recycling program such as</p>

## **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.

No water quality sampling was conducted in Year 4 with the intent of assessing the effectiveness of the SWMP.

The City of New Braunfels has an ongoing street sweeping program and drainage inlet maintenance program. The street sweeper program was implemented in MS4 Years 1-4 and will be continued in future years. A summary of the FY 17-18 street sweeping program is included in Section B.4 of the MS4 Annual Report (on Page 17, GH-1). The existing sweeping program reduces the amount of sediment and pollutants on City streets to the maximum extent practicable, thereby reducing the discharge of pollutants to surface waters. The vacuum sweepers utilized for the street sweeping program were visually observed removing sediment and pollutants from the roadways. The volume of sediment and material swept and removed from City streets is also tracked.

The drainage inlet maintenance program includes cleaning of drainage inlets throughout the City. Following rain events, drainage inlets throughout the City are visually inspected and cleaned on an as needed basis. Records of the maintenance activities are retained by the City.

In Year 4, stormwater outfalls were visually inspected and assessed as part of the City's IDDE and Dry Weather Screening program. If flow was observed during dry weather conditions, the flow was screened for signs of pollutants. No illicit discharges were observed in Year 4 as part of the Dry Weather Screening program.

Volunteer stream clean-up events and City-funded river/ Park clean-ups reduce the volume of trash and litter discharged to local rivers, creeks and drainageways.

## **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))
  - The City and its project partners have developed a Watershed Protection Plan (WPP) to addresses the bacteria impairment on the Dry Comal Creek (Segment

administers a comprehensive regulatory program for the management of on-site sewage facilities (OSSFs), as prescribed by the Texas Health and Safety Code, Chapter 366. This chapter establishes minimum standards for planning materials, construction, installation, alteration, repair, extension, operation, maintenance, permitting, and inspection of OSSFs.

It is the public policy of the City of New Braunfels and purpose thereof to eliminate and prevent OSSF health hazards by regulating and properly confirming the site and soil conditions, design, construction, installation, operation, and maintenance of OSSF's through permitting of all such systems, technical evaluation of the OSSF's hydraulic characteristic, system testing, and documentation of all aspects of the operational system to ensure compliance with Statute.

As the TCEQ's authorized agent, the City investigates all complaints regarding OSSF's, and takes appropriate and timely action on all documented violations; including reporting 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, under the authority of ordinance, the Texas Water Code, Chapters 7 and 26, and or the Texas Health and Safety Code, Chapters 341 and 366.

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)):

Not applicable

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)):

Not applicable

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)):

Not applicable

Description of bacteria-focused BMP	Comments/Discussion
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, working in conjunction with representatives from the Texas Parks and Wildlife Department (TPWD) and other stakeholders within the watershed, drafted an ordinance prohibiting the feeding wildlife within the City limits. This ordinance was passed by city council on September 10th, 2018 in Year 4. The feeding ordinance is expected to decrease the concentration of urban wildlife in contributing watershed areas, also decreasing 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.

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)): Not applicable

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

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

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
3	CS-1	Construction site inspection program	Routine inspections of active construction sites will continue to be conducted in Year 5. The City's construction stormwater management ordinance will support the inspection program and provide a framework for following up with issues of non-compliance.
4	PC-2	Post-Construction Stormwater Management	<p>City staff will continue to review development plans to ensure that permanent water quality control requirements for new developments are being met.</p> <p>New public and private water quality controls will be tracked. Inspections of permanent water quality controls will continue to be conducted in Year 5 according to established SOPs.</p>
4	PC-3	Long-term Operation and Maintenance	The City will continue to perform inspection of permanent stormwater controls within the City limits in Year 5. City Code section 143-8 includes inspection and maintenance requirements that will help to ensure maintenance and operational integrity of stormwater controls.
4	PC-5	Encouragement of LID	The City is planning to implement LID and green infrastructure projects in Year 5 that will provide an example to local engineers and the development community.

## H. Additional Information

1. Is the permittee relying on another entity to satisfy some of its permit obligations? (refer to the MS4 General Permit TXR040000 Part IV Section B.2.(g))

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 SWMP to perform tasks associated with address 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

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


Authorization Number: _____	Permittee: _____
Authorization Number: _____	Permittee: _____
Authorization Number: _____	Permittee: _____
Authorization Number: _____	Permittee: _____



## J. Certification

*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: 11-12-18

Name of MS4: City of New Braunfels

**Note:** 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).