



# City of West Lake Hills

911 Westlake Drive  
West Lake Hills, TX 78746  
(512) 327-3628 [www.westlakehills.org](http://www.westlakehills.org)

March 28, 2022

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

Re: Phase II MS4 Annual Report Transmittal for City of West Lake Hills  
TPDES Authorization: TXR040407

Dear Team Leader:

This letter serves to transmit the required annual report for the Texas Pollutant Discharge Elimination System Small Municipal Separate Storm Sewer System General Permit, Authorization Number TXR040407 for the City of West Lake Hills.

The annual report is for Year 3. The reporting period's beginning 01/01/2021 and ending 12/31/2021.

A separate letter of change has been submitted based on the fact that changes have been proposed for the next permit year.

As required by the general permit, a copy of the report has been mailed to the TCEQ's regional office 11 in Austin, Texas.

Sincerely,

A handwritten signature in black ink, appearing to read "A Grundman".

Ashby Grundman  
Interim City Administrator  
City of West Lake Hills

# Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

## A. General Information

Authorization Number: TXR040407

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

Annual Reporting Year Option Selected by MS4:

Calendar Year: X

Permit Year: \_\_\_\_\_

Fiscal Year: \_\_\_\_\_ Last day of fiscal year: (\_\_\_\_\_)

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

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

MS4 Operator Level: 2 Name of MS4: City of West Lake Hills

Contact Name: Ashby Grundman Telephone Number: 512-327-3628

Mailing Address: 911 Westlake Drive

E-mail Address: agrundman@westlakehills.org

A copy of the annual report was submitted to the TCEQ Region: YES X  
NO \_\_\_ Region the annual report was submitted to: TCEQ Region 11

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

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

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	X		The report includes a list of all MCM's the responsibilities of each, and the action taken or a Notice of Change for modifications to the MCMs.

Permittee is currently in compliance with recordkeeping and reporting requirements.	X	West Lake Hills is tracking MCMs. Reports are provided on an annual basis and delivered before the due date of March 30 each year.
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	X	West Lake Hills is currently in compliance with the permit.
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report	X	The SWMP was reviewed during the preparation of the annual report. Several changes have been identified for the SWMP and submitted with the Notice of Change.

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

<b>MCM(s)</b>	<b>BMP</b>	<b>BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)</b>
1-1 No. 1 Public Education and Outreach on Stormwater Impacts	Public education and outreach	Yes. Provide educational information on the City's website and are emailed to applicants upon issuance of a new construction permit.
1-2 No. 1 Public Education and Outreach on Stormwater Impacts	Household hazardous waste program	Yes. Provided information on the City website and included it in the WCID flyers.
1-3 No. 1 Public Education and Outreach on Stormwater Impacts	Water conservation program	Yes. Provided educational information on water quality the City website.

1-4 No. 1 Public Education and Outreach on Stormwater Impacts	Edwards Aquifer Recharge or Contributing Zone Information	Yes. Provide educational information on the City's website and in flyers mailed annually with the W.C.I.D. No. 10.
1-5 No. 1 Public Education and Outreach on Stormwater Impacts	Public Notice for Developing and Implementing SWMP	Yes. Provided public information documents on the website.
1-6 No. 1 Public Education and Outreach on Stormwater Impacts	Stormwater Pollution Prevention Ordinance	Yes. City is working to review and look for ways to improve the ordinance. City will involve the public through public hearings when draft ordinance is available.
1-7 No. 1 Public Education and Outreach on Stormwater Impacts	Community Hotlines	Yes. The City is working to improve the script used for incoming calls reporting illicit discharge.
2-1 No. 2 Illicit Discharge Detection and Elimination	Develop Storm Sewer System Map	Yes (ongoing). Storm Sewer Maps have been developed and is updated as needed identifying drainage features for maintenance etc.
2-2 No. 2 Illicit Discharge Detection and Elimination	Stormwater Pollution Prevention Ordinance	Yes. Working with the City Engineer to review and improve stormwater ordinances and revise as necessary.
2-3 No. 2 Illicit Discharge Detection and Elimination	Illicit Discharge Detection and Elimination Program	Yes. Outfalls are inspected periodically, and corrective action is taken if illicit discharge is observed.
2-4 No. 2 Illicit Discharge Detection and Elimination	Building Permit Plan Review	Yes, all building plans are reviewed for stormwater issues and construction sites are inspected regularly for compliance.

2-5 No. 2 Illicit Discharge Detection and Elimination	Used Oil Recycling Program	Yes, City staff has posted the information to City website regarding recycling centers and used oil disposal facilities.
2-6 No. 2 Illicit Discharge Detection and Elimination	Public Reporting	Yes, City tracks reports of illicit discharges. City staff is in the process of preparing a post for the City website giving instructions for how to report illicit discharges.
2-7 No. 2 Illicit Discharge Detection and Elimination	City Inspector training	Yes, the training helps the City staff to better identify, report, and handle illicit discharge.
3-1 No. 3 Construction Site Storm Water Runoff Control	Erosion and Sedimentation Control Ordinance	Yes. Adopted Drainage & Erosion Control Design Manual by ordinance in 2018, which includes erosion control measures. The report was updated in May of 2020 and is continually reviewed and updated as needed.
3-2 No. 3 Construction Site Storm Water Runoff Control	Construction Site Stormwater Pollution Prevention Education Program	Working with City staff to implement annual educational seminar and incorporation of MS4 information into building permit application. MS4 information is also posted to the City website at <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
3-3 No. 3 Construction Site Storm Water Runoff Control	Comprehensive Building Permit Plan Reviews	Yes, all building plans are reviewed comprehensively by staff. Educational materials for Construction sites are located online.
3-4 No. 3 Construction Site Storm Water Runoff Control	Site Inspection and Enforcement	Yes, building sites are visited periodically for compliance with approved plans. City inspector verifies the erosion controls are in place at the time of the pre-construction meeting.
3-5 No. 3 Construction Site Storm Water Runoff Control	Public Reporting for Construction Sites	Yes, City tracks reports of illicit discharges from construction sites. Working with City staff to formalize process and disseminate information about reporting illicit discharges to stormwater system from construction sites. Information on how to report illicit discharge incidents is located on the website.

4-1 No. 4 Post-Construction Stormwater Management	Water Quality Control Ordinance for Post-Construction Runoff	Yes. Adopted Drainage & Erosion Control Design Manual by ordinance in 2018, which includes water quality regulations. The report was updated in May of 2020 and is continually reviewed and updated as needed.
4-2 No. 4 Post-Construction Stormwater Management	Development Review Process	Yes, all site work construction plans are reviewed for mitigation of impact.
5-1 No. 5 Pollution Prevention/Good Housekeeping	Municipal Employee and Contractor Education Program	Yes. Working with City staff to implement training program for municipal employees and City contractors regarding appropriate housekeeping and stormwater pollution prevention techniques.
5-2 No. 5 Pollution Prevention/Good Housekeeping	Storm Sewer System Maintenance Program	Yes. Cleaned ditches, and culverts, repaired culverts, installed rock gabions, etc. Notified all private property owners with required storm water system infrastructure, that such infrastructure must be inspected annually by an engineer, and that a report must be sent to the City each year to verify that infrastructure is functioning as designed.
5-3 No. 5 Pollution Prevention/Good Housekeeping	Spill Response and Prevention Plan	NA – no sites in West Lake Hills currently require a Spill Prevention plan.
5-4 No. 5 Pollution Prevention/Good Housekeeping	Municipal Operations Pollutant Reduction Program	Yes. The City practices safe storage of chemicals and properly disposes of automotive fluids, batteries, etc.
5-5 No. 5 Pollution Prevention/Good Housekeeping	City Vehicle Maintenance	Yes. Vehicles are regularly maintained, and maintenance logs are kept up to date.

3. Describe progress towards achieving the goal of reducing the discharge of pollutants to the MEP. If no progress was made or the BMP did not result in a reduction in pollutants, provide an explanation. Use the table below to meet this requirement (**see Example 2 in instructions**):

<b>MCM</b>	<b>BMP</b>	<b>Information Used</b>	<b>Quantity</b>	<b>Units</b>	<b>Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)</b>
1	1-1 Public education and outreach	Estimated quantities of materials	1	Website  Email	No, information was posted on the website, but there is no direct way of measuring the pollutant reduction.  Brochures are also emailed to applicants upon issuance of construction permit  <a href="https://www.westlakehills.gov/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.gov/228/Stormwater-Pollution-Education-and-Aware</a>
1	1-2 Household hazardous waste program	Estimated quantities of materials	1	Website	No, information was posted on the website, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
1	1-3 Water conservation program	Estimated quantities of materials	1	Website	No, information was posted on the website for water quality, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
1	1-4 Edwards Aquifer Recharge or Contributing Zone Information	Estimated quantities of materials	1	Website	No, information was posted on the website, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
1	1-5 Public Notice for Developing and Implementing SWMP	Estimated quantities of materials	1	Website	No, information was posted on the website, but there is no direct way of measuring the pollutant reduction. Public meetings are postponed until the 2022 calendar year in hopes they can be held in person.  <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>

1	1-6 Stormwater Pollution Prevention Ordinance	-	-	-	Public hearings for the Stormwater Pollution Prevention Ordinance were not held in 2021. The majority of the meetings for the year were held virtually. The City feels like the public hearing will be more beneficial with more open lines of communication once it can be held in person.
1	1-7 Community Hotlines	Approximate number of phone calls received	100%	Phone Calls	Yes, West Lake receives phone calls from public to report illicit discharges to inspect reported sites and address accordingly to clean up and prevent future discharges (when possible)
2	2-1 Develop Storm Sewer System Map	Estimated quantities of materials	1	Materials	No – storm sewer mapping for West Lake is ongoing but there's no direct way of measuring pollutant reduction from mapping.
2	2-2 Stormwater Pollution Prevention Ordinance	Estimated quantities of materials	1	Review	No –West Lake's illicit discharge codes were reviewed, but there's no direct way of measuring pollutant reduction from mapping.
2	2-3 Illicit Discharge Detection and Elimination Program	Percentage of outfalls inspected	10%	Percentage	Yes – West Lake periodically inspects detention pond outfalls, drainage systems, and natural drainage features to identify illicit discharges and provide clean up and awareness of recorded sites to increase inspections.
2	2-4 Building Permit Plan Review	Estimated quantities of review	100%	Reviews	Yes – West Lake requires review of all construction plans for temporary and permanent BMP's to ensure that plans and methods are sufficient and will function properly to help prevent pollution of groundwater.
2	2-5 Used Oil Recycling Program	Estimated quantities of materials	1	Website	No, information is posted on the website, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
2	2-6 Public Reporting	Estimated quantities of materials	1	Materials	No, information is posted on the website, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/DocumentCenter/View/2043/Draft-MS4-Flyer_Education">https://www.westlakehills.org/DocumentCenter/View/2043/Draft-MS4-Flyer_Education</a>



2	2-7 City Inspector training	-	-	-	City inspectors will be sent to trainings in future years when there are more in-person training opportunities.
3	3-1 Erosion and Sedimentation Control Ordinance	Estimated quantities of materials	1	Materials	No, the Drainage criteria manual was reviewed and updated in May of 2020, but there is no direct way to measure the pollutant reduction.
3	3-2 Construction Site Stormwater Pollution Prevention Education Program	Estimated quantities of materials	1	Website	No, information was posted on the website, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
3	3-3 Comprehensive Building Permit Plan Reviews	Estimated quantities of materials	1	Website	Yes, the permit applications requires applicant to list which area of the Edwards Aquifer the permit is located within. Permit requirements are checked with each new permit submitted to the City.  <a href="https://www.westlakehills.org/95/Building-Development">https://www.westlakehills.org/95/Building-Development</a>
3	3-4 Site Inspection and Enforcement	Number of Construction Site Inspections	50	Inspections	Yes, all permits requiring exterior work, including site/flatwork, require pre-construction meetings with City Inspector to verify erosion controls in place.
3	3-5 Public Reporting for Construction Sites	Estimated quantities of materials	1	Website	No, information is posted on the website, but there is no direct way of measuring the pollutant reduction.  <a href="https://www.westlakehills.org/DocumentCenter/View/2043/Draft-MS4-Flyer_Education">https://www.westlakehills.org/DocumentCenter/View/2043/Draft-MS4-Flyer_Education</a>
4	4-1 Water Quality Control Ordinance for Post-Construction Runoff	Estimated quantities of materials	1	Materials	No, the Drainage criteria manual was reviewed no updates were made in 2021, but there is no direct way to measure the pollutant reduction.

4	4-2 Development Review Process	Estimated quantities of review	100 %	Reviews	Yes – West Lake requires review of all construction plans for temporary and permanent BMP's to ensure that plans and methods are sufficient and will function properly to help prevent pollution of groundwater.
5	5-1 Municipal Employee and Contractor Education Program	-	-	-	City inspectors will be sent to trainings in future years when there are more in-person training opportunities.  Educational construction storm water flyers have been published to the city website and are made available to city staff. <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>
5	5-2 Storm Sewer System Maintenance Program	Estimate volume of storm sewer waste collected on annual basis.	Varies	Sediment/ twigs, branches, leaves	Yes – West Lake Hills removes all excessive buildups of foreign objects, sediment, twigs, branches, leaves, etc. from drainage facilities which ensures proper functionality and prevents backups and overflow to help minimize groundwater contamination.
5	5-3 Spill Response and Prevention Plan	Determine number of sites that require Spill Prevention	0	Spill Prevention Plan	No – There are currently no sites that require SPCC's. All sites that require spill prevention will be identified and reviewed to confirm that required spill prevention plans are provided to prevent contamination of groundwater.
5	5-4 Municipal Operations Pollutant Reduction Program		Varies	Safe Chemical Storage	Yes. The City practices safe storage of chemicals and properly disposes of automotive fluids, batteries, etc.
5	5-5 City Vehicle Maintenance	Estimated percent of city vehicle with maintenance records	100%	Percentage	Yes – West Lake Hills keeps vehicle maintenance records and keeps track of maintenance schedule and cost to ensure that vehicles are properly budgeted for and will be serviced per manufacturer's recommendation.

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

<b>MCM(s)</b>	<b>Measurable Goal(s)</b>	<b>Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.</b>
1-1 No. 1 Public Education and Outreach on Stormwater Impacts	Post information on the website	Goal met - Educational materials are available online for pollution prevention and emailed to applicants upon approval of their permit. Flyers were mailed with W.C.I.D. 10 bills in January of 2021 and provided in City Hall lobby. Educational materials are provided on inspector first site visit. Goal not met – posting on NextDoor
1-2 No. 1 Public Education and Outreach on Stormwater Impacts	Post information on the website	Goal met - Educational materials are available online for location of recycling centers.
1-3 No. 1 Public Education and Outreach on Stormwater Impacts	Education	Goal met - Educational information was posted online regarding the Edwards Aquifer. Did not meet the goal of posting water conservation information to the city website.
1-4 No. 1 Public Education and Outreach on Stormwater Impacts	Post information on the website	Goal met - Educational materials are available online for Edwards Aquifer information, brochures were mailed with W.C.I.D 10 bills in January of 2021 and brochures are available at City Hall lobby. Educational materials are provided on inspector first site visit.
1-5 No. 1 Public Education and Outreach on Stormwater Impacts	Post Stormwater Management plan and hold public meetings	Educational material is available online. Did not meet the goal of public meetings for the SWMP in 2021. The majority of the meetings for the 2021 year were held virtually. The City feels the public hearing will be more beneficial with more open lines of communication once it can be held in person
1-6 No. 1 Public Education and Outreach on Stormwater Impacts	Hold public hearings	Did not meet the goal - public hearings for the Stormwater Pollution Prevention Ordinance were not held in 2021. The majority of the meetings for the 2021 year were held virtually. The City feels the public hearing will be more beneficial with more open lines of communication once it can be held in person.
1-7 No. 1 Public Education and Outreach on Stormwater Impacts	Produce script and document illicit discharge	(ongoing) The City is working to improve the script used for incoming calls reporting illicit discharge. Illicit discharge calls are documents as they are received by the City.

2-1 No. 2 Illicit Discharge Detection and Elimination	Review and updated drainage maps	Goal met (ongoing) - Storm Sewer Maps have been developed and updated as needed identifying drainage features. The updates are currently ongoing.
2-2 No. 2 Illicit Discharge Detection and Elimination	Review ordinances and update as needed	Goal met (ongoing) Working with the City Engineer to review and improve stormwater ordinances as necessary. No updates were made to the ordinance this year.
2-3 No. 2 Illicit Discharge Detection and Elimination	Conduct inspections	Goal met - Inspections of the storm sewer system are conducted periodically.
2-4 No. 2 Illicit Discharge Detection and Elimination	Plan review and site visits	Goal met - All building plans are reviewed for stormwater issues and construction sites are inspected regularly for compliance.
2-5 No. 2 Illicit Discharge Detection and Elimination	Post information to the website	Goal met - City staff has posted the information to City website regarding recycling centers and used oil disposal facilities.
2-6 No. 2 Illicit Discharge Detection and Elimination	Track illicit discharge and post information	Goal met - City tracks reports of illicit discharges and information on how to report illicit discharge is located on the city website.
2-7 No. 2 Illicit Discharge Detection and Elimination	Illicit discharge training	Did not meet the goal – the City is looking for more in person training opportunities in 2022.
3-1 No. 3 Construction Site Storm Water Runoff Control	Evaluate erosion and sediment control ordinance and revise if necessary	Goal met - Adopted Drainage & Erosion Control Design Manual by ordinance in 2018, which includes erosion control measures and the report was updated in May of 2020. The manual is reviewed periodically for updates.
3-2 No. 3 Construction Site Storm Water Runoff Control	Provide information and requirements on the city website	City staff is working to implement annual educational seminar and incorporation of MS4 information into building permit application. MS4 information is posted to the City website at <a href="https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware">https://www.westlakehills.org/228/Stormwater-Pollution-Education-and-Aware</a>

3-3 No. 3 Construction Site Storm Water Runoff Control	Require TCEQ permitting, review procedures for plan review and revise if necessary	Goal met - All building plans are reviewed comprehensively by staff and internal review process is reviewed and updated as necessary. TCEQ permits are required if applicable to the site.
3-4 No. 3 Construction Site Storm Water Runoff Control	Inspect erosion controls and document violations	Goal met - Building sites are visited periodically for compliance with approved plans. The City Inspector verifies erosion controls are in place at the time of all required pre-construction meetings.
3-5 No. 3 Construction Site Storm Water Runoff Control	Provide instructions on how to report illicit discharge	Goal met - Information on how to report illicit discharge is located on the City website. The City tracks reports of illicit discharges from construction sites.
4-1 No. 4 Post- Construction Stormwater Management	Post construction BMP practices	Goal met - Adopted Drainage & Erosion Control Design Manual by ordinance in 2018, which includes water quality regulations. An update to the manual was made in May 2020. The manual is reviewed periodically for updates and posted on the City website.
4-2 No. 4 Post- Construction Stormwater Management	Development review process	Goal met - All site work construction plans are reviewed for mitigation of impact.
5-1 No. 5 Pollution Prevention/Good Housekeeping	Municipal employee and contractor education programs	Goal met - Educational material is posted online and made available to City staff. Did not meet the goal for sending City staff to trainings – the City is looking for more in person training opportunities in 2022.
5-2 No. 5 Pollution Prevention/Good Housekeeping	Track storm sewer maintenance activities	Goal met - Cleaned ditches, and culverts, repaired culverts, installed rock gabions, etc. as part of the annual maintenance process.
5-3 No. 5 Pollution Prevention/Good Housekeeping	Develop spill response plan	NA – no sites in West Lake Hills currently require a Spill Prevention plan at this time.

5-4 No. 5 Pollution Prevention/Good Housekeeping	Proper storage and disposal of chemicals	Goal met - The City practices safe storage of chemicals and properly disposes of automotive fluids, batteries, etc.
5-5 No. 5 Pollution Prevention/Good Housekeeping	City vehicle maintenance	Goal met - Vehicles are regularly maintained, and maintenance logs are kept up to date.

### **C. Stormwater Data Summary**

Provide a summary of all information used, including any lab results (if sampling was conducted) to assess the success of the SWMP at reducing the discharge of pollutants to the MEP. For example, did the MS4 conduct visual inspections, clean the inlets, look for illicit discharge, clean streets, look for flow during dry weather, etc.?

1. Educational flyers, website links, and materials provided per Public Education, Outreach & Involvement.
2. Storm Sewer Maps updates (ongoing).
3. The City of West Lake Hills ordinances that enforce soil erosion control, drainage criteria, and illicit discharge control that provides conformance with MS4 responsibilities. The City updated and reviewed the Drainage Criteria Manual.
4. Building permits required for development that require site plan review requirements and inspections during construction.
5. Records of city vehicle maintenance, and stormwater sewer system waste.

### **D. Impaired Waterbodies (N/A)**

1. Identify whether an impaired water within the permitted area was added to the latest EPA-approved 303(d) list or the Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d). List any newly-identified impaired waters below by including the name of the water body and the cause of impairment.

2. If applicable, explain below any activities taken to address the discharge to impaired waterbodies, including any sampling results and a summary of the small MS4's BMPs used to address the pollutant of concern.
  
3. Describe the implementation of targeted controls if the small MS4 discharges to an impaired water body with an approved TMDL.
  
4. Report the benchmark identified by the MS4 and assessment activities:

<b>Benchmark Parameter</b> <i>(Ex: Total Suspended Solids)</i>	<b>Benchmark Value</b>	<b>Description of additional sampling or other assessment activities</b>	<b>Year(s) conducted</b>

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

<b>Benchmark Parameter</b>	<b>Selected BMP</b>	<b>Contribution to achieving Benchmark</b>


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

<b>Description of bacteria-focused BMP</b>	<b>Comments/Discussion</b>

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

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

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

<b>Benchmark Indicator</b>	<b>Description/Comments</b>
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## E. Stormwater Activities

Describe activities planned for the next reporting year:

<b>MCM(s)</b>	<b>BMP</b>	<b>Stormwater Activity</b>	<b>Description/Comments</b>
1	1-1 Public education and outreach	Educational	Provide educational flyers through mail with the W.C.I.D. 10 bill to residents, post on city website, make available at City Hall, email to applicants upon approval of construction permit, post on nextdoor.
1	1-2 Household hazardous waste program	Educational	Provide educational flyers through mail with the W.C.I.D. 10 bill and post on city website.
1	1-3 Water conservation program	Educational	Post educational material on the City website.
1	1-4 Edwards Aquifer Recharge or Contributing Zone Information	Educational	Provide educational flyers through mail with the W.C.I.D. 10 bill to residents, post on city website, make available at City Hall, post on nextdoor.
1	1-5 Public Notice for Developing and Implementing SWMP	Educational/public outreach	Hold a public hearing at a City Council meetings for public input on the SWMP and produce SWMP documents to post on the City's website.
1	1-6 Stormwater Pollution Prevention Ordinance	Educational/public outreach	Hold public hearing at City Council meetings for public input.

1	1-7 Community Hotlines	Educational, reporting & inspection	Review phone operator script and track the number of illicit discharge reports
2	2-1 Develop Storm Sewer System Map	Record Keeping & Reporting	Continue to update storm system map as needed.
2	2-2 Stormwater Pollution Prevention Ordinance	Policy review	Review City Code for illicit discharge and update if necessary
2	2-3 Illicit Discharge Detection and Elimination Program	Inspection/enforcement	Conduct dry weather inspections of storm sewer systems and outfalls once annually and check for illegal dumping. Assess civil penalties and fines for illicit discharge and/or reimbursement to City for cleanup costs.
2	2-4 Building Permit Plan Review	Plan review/enforcement	Conduct plan reviews for illicit discharge and connections and conduct site visits during construction to confirm compliance.
2	2-5 Used Oil Recycling Program	Educational	Provide information on the City website for location and proper disposal of hazardous waste and vehicle oils.
2	2-6 Public Reporting	Educational/reporting	Post instruction on how to report illicit discharge on the City website and in brochures and materials. Track reports of illicit discharge and take appropriate action as/if warranted.
2	2-7 City Inspector training	Training/Education	Send City inspectors to Texas illegal Dumping Resource Center trainings or view online classes.
3	3-1 Erosion and Sedimentation Control Ordinance	Policy review	Conduct a review of the drainage criteria manual to determine if updates are necessary.
3	3-2 Construction Site Stormwater Pollution Prevention Education Program	Education	Provide educational documents/flyer in the Building Permit application and on the City website.
3	3-3 Comprehensive Building Permit Plan Reviews	Enforcement/policy review	Continue requirement or submittal of TCEQ approved Edwards Aquifer Protection Plan as required with building plans. Evaluate building permit plan procedures and review processes and revise as necessary.

3	3-4 Site Inspection and Enforcement	Inspection/reporting	Inspect erosion control measures at least once per month, document violations, and follow-up inspections to ensure enforcement. Notify TCEQ as applicable.
3	3-5 Public Reporting for Construction Sites	Education/reporting/tracking	Provide instruction on how to report stormwater pollution from construction sites. City will track reports and take action as/if necessary.
4	4-1 Water Quality Control Ordinance for Post-Construction Runoff	Policy Review	Ratify/approve ordinance revisions to the City Code for post-construction runoff water quality measures and include provisions for long-term operation and maintenance of BMPs.
4	4-2 Development Review Process	Plan review	Review site work construction plans for appropriate mitigation. Require annual post-construction inspections and report from project engineer on compliance with the City Code.
5	5-1 Municipal Employee and Contractor Education Program	Education/training	Develop program and provide educational training to necessary City employees and City contractors.
5	5-2 Storm Sewer System Maintenance Program	Maintenance/reporting	Develop and implement routine inspection and maintenance of storm sewer systems. Respond to citizen reports and field observations. Track storm sewer maintenance activities.
5	5-3 Spill Response and Prevention Plan	Policy development/reporting	Develop and implement a spill response and prevention program in conjunction with Westlake Fire Department. Track and prepare annual reports of spill and cleanup operations as warranted.
5	5-4 Municipal Operations Pollutant Reduction Program	Education/maintenance	Proper storage and disposal of oil, chemicals, batteries, and other automotive maintenance activities to prevent contact with storm water. Provide spill cleanup procedures.
5	5-5 City Vehicle Maintenance	Inspection/maintenance	Conduct routine inspections of vehicles to check fluids for leaks. Keep vehicles up to date on state inspections.

## F. SWMP Modifications

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

Yes  No

2. Changes have been made or are proposed to the SWMP since the NOI or the last annual report, including changes in response to TCEQ’s review.

Yes  No

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

<b>MCM(s)</b>	<b>Measurable Goal(s) or BMP(s)</b>	<b>Implemented or Proposed Changes (Submit NOC as needed)</b>
1	1-5 Hold 3 public hearings at City Council Meetings for public input on SWMP	Revised goal - One public meeting in the calendar year 2022 for SWMP public input is proposed. The meeting has been postponed to the calendar year 2022 when the City hopes to hold the meeting in person to facilitate more open conversation and communication.
1	1-6 Hold a public hearing at City Council meeting for public input on Storm Water Pollution Prevention Ordinance	Revised implementation schedule - The meetings have been postponed to the calendar year 2022 when the City hopes to hold the meeting in person to facilitate more open conversation and communication.
2	2-7 Send City inspectors to Texas Illegal Dumping Resource Center trainings, or view online classes.	Revised implementation schedule – the city plans to send appropriate city staff to in-person training opportunities in 2022.
5	5-1 Develop program and provide educational training to necessary City employees and City contractors.	Revised implementation schedule - the city plans to send appropriate city staff to in-person training opportunities in 2022.

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

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

### G. Additional BMPs for TMDLs and I-Plans

Provide a description and schedule for implementation of additional BMPs that may be necessary, based on monitoring results, to ensure compliance with applicable TMDLs and implementation plans.

<b>BMP</b>	<b>Description</b>	<b>Implementation Schedule (start date, etc.)</b>	<b>Status/Completion Date (completed, in progress, not started)</b>

### H. Additional Information

1. Is the permittee relying on another entity to satisfy any permit obligations?

Yes  No

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

Name and Explanation:

West Lake Hills has acquired the services of K Friese and Associates (KFA) to assist with MS4 responsibilities and reporting. KFA assist with site plan review of construction (drainage and soil erosion control), providing engineered drainage solutions, adjustments to city codes, and assisting with annual reporting requirements.

Name and Explanation:

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: \_\_\_\_\_

### I. Construction Activities

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

0

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

Yes  No

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

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

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

### J. Certification

If this is this a system-wide annual report including information for all permittees, each permittee shall sign and certify the annual report in accordance with 30 TAC §305.128 (relating to Signatories to Reports).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Name (printed): Ashby Grundman Title: Interim City Administrator

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

Name of MS4 City of West Lake Hills

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

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

Name of MS4 \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

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

Name of MS4 \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

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

Name of MS4 \_\_\_\_\_

Name (printed): \_\_\_\_\_ Title: \_\_\_\_\_

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

Name of MS4 \_\_\_\_\_

**If you have questions on how to fill out this form or about the Stormwater Permitting program, please contact us at 512-239-4671.**

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.