PHASE II MS4 ANNUAL REPORT

PERMIT YEAR 6: 2024

January 1, 2024 to December 31, 2024

For

Fort Bend County MUD No. 165

TPDES Permit No. TXR040421

QUIDDITY ENGINEERING

Phase II (Small) MS4 Annual Report Form

TPDES General Permit Number TXR040000

A. General Information

Authorization Number: TXR040421

Reporting Year (year will be either 1, 2, 3, 4, or 5): 6 (per guidance from TCEQ)

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): January 1, 2024

Reporting period end date: (month/date/year): December 31, 2024

MS4 Operator Level: Level 2

Name of MS4: Fort Bend County MUD 165 MS4

Contact Name: Liz Stone with Quiddity Engineering (MS4 Administrator)

Telephone Number: (281) 363-4039

Mailing Address: 1575 Sawdust Road, Suite 400, The Woodlands, TX 78380

E-mail Address: lstone@quiddity.com

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

Region the annual report was submitted to: TCEQ Region 12

B. Status of Compliance with the MS4 GP and SWMP

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

	Yes	No	Explain
Permittee is currently in compliance with the SWMP as submitted to and approved by the TCEQ.	Yes		
Permittee is currently in compliance with recordkeeping and reporting requirements.	Yes		
Permittee meets the eligibility requirements of the permit (e.g., TMDL requirements, Edwards Aquifer limitations, compliance history, etc.).	Yes		
Permittee conducted an annual review of its SWMP in conjunction with preparation of the annual report.	Yes		

2. Provide a general assessment of the appropriateness of the selected BMPs. You may use the table below to meet this requirement:

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
1.	3.1 Utility Bill Inserts	YES. The MS4 distributed approximately 1,503 stormwater educational inserts in Spring 2024 outlining the steps to reduce potential pollutants from getting into the stormwater and good housekeeping principles.
2.	3.1 Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Water & Structural Controls	YES. The map was evaluated, and no updates were needed in Permit Year 6.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
2.	4.1 Training for Illicit Discharge Detection & Elimination	YES. A MS4 Training Session was conducted on June 18, 2024, through a webinar by the MS4 Administrator. The recorded presentation was placed on the MS4 Administrator's website https://quiddity.com/municipal-separate-storm-sewer-system-training/. A digital sign-in sheet and certificate were used to document attendance.
2.	5.1 Public Reporting using Utility Bill Inserts	YES. The MS4 distributed approximately 1,503 stormwater educational inserts during Permit Year 6. The insert provided a phone number for residents to report illicit discharges and other pollution concerns.
3.	6.1 Training for Construction Site Stormwater Runoff Control	YES. A MS4 Training Session was conducted on June 18, 2024, through a webinar by the MS4 Administrator. The recorded presentation was placed on the MS4 Administrator's website https://quiddity.com/municipal-separate-storm-sewer-system-training/. A digital sign-in sheet and certificate were used to document attendance.
4.	6.1 Training for Post-Construction Stormwater Controls	YES. An MS4 training session was conducted on June 18, 2024, through a webinar by the MS4 Administrator. The recorded presentation was placed on the MS4 Administrator's website (https://quiddity.com/municipal-separate-storm-sewer-system-training/). A digital sign-in sheet and certificate were used to document attendance.
5.	4.1 Training for Pollution Prevention & Good Housekeeping	YES. An MS4 training session was conducted on June 18, 2024, through a webinar by the MS4 Administrator. The recorded presentation was placed on the MS4 Administrator's website (https://quiddity.com/municipal-separate-storm-sewer-system-training/). A digital sign-in sheet and certificate were used to document attendance.

MCM(s)	BMP	BMP is appropriate for reducing the discharge of pollutants in stormwater (Answer Yes or No and explain)
5.	5.1 Disposal of Waste	YES. The MS4 provided one (1) spill response kit for use to prevent illicit discharges from entering the storm sewer system. The MS4 ensured all waste materials removed are properly disposed of and do not contribute as pollutants within the MS4.
5.	7.1 Municipal Operation & Maintenance Activities	YES. The MS4's Emergency Spill Response Plan was evaluated, and no changes were needed in Permit Year 6. Additionally, the MS4 reviewed the list of possible pollutants of concern and pollution prevention measures for the facilities listed in the inventory list in BMP 5.3.1; no changes were recommended. The MS4's one (1) lift stations was inspected and no non-compliance issues were observed.

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:

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.	3.1	Utility Bill Inserts	1,503	Educational Inserts	NO. Though this BMP does not result in a direct reduction of pollutants, stormwater educational inserts provide public education to residents on good housekeeping principles and pollution prevention measures.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
1.	5.1	Opportunity for Public Comment	12 1	Board Meetings Posted Annual Reports on Websites	YES. Permit Year 6 Best Management Practices (BMPs) were discussed at the District's monthly board meetings. The SWMP, Notice of Intent (NOI), General Permit, and Fact Sheet are electronically available upon request. The MS4 posted submitted Annual Reports for this permit term on their website, https://fbcmud165.org/documents/,per the requirements in the General Permit.
2.	3.1	Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Waters, & Structural Controls	1	MS4 Map	NO. The map was evaluated, and no updates were needed in Permit Year 6. This BMP is helpful when tracking illicit discharges but does not directly reduce pollutants.
2.	4.1	Training for Illicit Discharge Detection and Elimination	1	Training Program	YES. A MS4 Training Session was conducted on June 18, 2024, through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify any illicit discharge.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
2.	5.1	Public Reporting Using Utility Bill Insert	1,503	Educational Inserts	YES. The MS4 distributed approximately 1,503 stormwater educational inserts during Permit Year 6. The insert provided a phone number for residents to report illicit discharges and other pollution concerns. This BMP can directly impact the reduction of potential pollutants in the stormwater.
2.	7.1	Evaluate the Rate Order for Illicit Discharge	1	Rate Order	YES. The MS4 formally adopted a revised Rate Order in Permit Year 3, and no changes were proposed in Permit Year 6. This BMP can have a direct reduction in pollutants by stating what is legally allowed/required and the consequences if conditions are not abided.
3.	3.1	Evaluate the Rate Order for Construction Site Stormwater Runoff Control	1	Rate Order	YES. The MS4 formally adopted a revised Rate Order in Permit Year 3, and no changes were proposed in Permit Year 6. This BMP can have a direct reduction in pollutants by stating what is legally allowed/required and the consequences if rules are not followed.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
3.	6.1	Training for Construction Site Stormwater Runoff Control	1	Training Program	YES. The MS4 training session was conducted on June 18, 2024, through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify any illicit discharge and other construction site concerns.
3.	7.1	Guidance Manual for Construction Site Stormwater Runoff Control	1	Guidance Manual	NO. The MS4 continued to utilize the "Construction Site and Post-Construction Runoff Controls Stormwater Permit and Stormwater Quality Plan Guidelines" by Fort Bend County to aid in implementing construction site BMPs. While the guidance manual provides information on how to implement erosion and sediment controls, soil stabilization, and best management practices (BMPs), it does not have a direct reduction in pollutants.
4.	3.1	Evaluate the Rate Order to Address Post-Construction Runoff	1	Rate Order	YES. The MS4 formally adopted a revised Rate Order in Permit Year 3, and no changes were proposed in Permit Year 6. It can have a direct reduction in the potential pollutants by stating what is legally allowed/required and the consequences if rules are not followed.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
4.	4.1	Guidance Manual for Post-Construction Stormwater Controls	1	Guidance Manual	NO. The MS4 continued to utilize the "Construction Site and Post-Construction Runoff Controls Stormwater Permit and Stormwater Quality Plan Guidelines" by Fort Bend County to aid in implementing post-construction BMPs. While the guidance manual provides information on how to provide long-term maintenance of post-construction stormwater control measures, it does not have a direct reduction in pollutants.
4.	6.1	Training for Post-Construction Stormwater Controls	1	Training Program	YES. The MS4 training session was conducted on June 18, 2024, through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel identify any illicit discharge from permanent stormwater control devices.
5.	3.1	Inventory of Facilities & Stormwater Structural Controls	1	List of Municipal Facilities	NO. The MS4's list of facilities and stormwater structural controls was evaluated. A lift station was added to the list in Permit Year 6. This list does not have a direct reduction in pollutants in the MS4.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5.	4.1	Training for Pollution Prevention & Good Housekeeping	1	Training Program	YES. The MS4 Training Program was conducted on June 18, 2024, through a webinar. The training presentation can have a direct reduction in pollutants by helping field personnel conduct municipal activities that do not negatively impact the MS4.
5.	5.1	Disposal of Waste	1	Spill Response Kit	YES. The MS4 provided one (1) spill response kit for their use to prevent illicit discharges from entering the storm sewer system. The MS4 ensured all waste materials removed are properly disposed of and do not contribute as pollutants within the MS4. The kit will have a direct reduction of pollutants into the MS4 if used.

MCM	BMP	Information Used	Quantity	Units	Does the BMP Demonstrate a Direct Reduction in Pollutants? (Answer Yes or No and explain)
5.	7.1	Municipal Operation & Maintenance Activities	1 1 1 1	Emergency Spill Response Plan Written Inspection and Follow-Up Procedures List of Pollutants of Concern & Prevention Measures MS4 Facility Inspection	YES. The MS4's Emergency Spill Response Plan was evaluated, and no changes were needed in Permit Year 6. The MS4 continued to reference written inspection and follow-up procedures for illicit discharges, construction stabilization measures, and municipal facilities, as needed. The MS4 reviewed the list of potential pollutants of concern and pollution prevention measures for the facilities listed in the inventory list for BMP 5.3.1; no changes were recommended. The Plan may have a direct reduction in pollutants, but the list and procedures do not have a direct reduction of pollutants. A site inspection was conducted at the MS4's lift station in Permit Year 6. No incidents of non-compliance were observed.

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

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
1.	3.1 Utility Bill Inserts – distribute to 100% of the community annually	MET GOAL. The MS4 distributed approximately 1,503 stormwater educational inserts once in the Spring of 2024 regarding municipal storm sewer discharges and stormwater quality issues.
1.	4.1 Storm Drain Marking – report 100% of installed markers annually	MET GOAL. The MS4's storm drain marking program was promoted in the utility bill inserts in Permit Year 6.
1.	5.1 Opportunity for Public Comment – hold Monthly Board meetings	MET GOAL. All monthly (12) Board Meetings are open to the public. All residents, businesses, and other interested parties within the MS4 area have an opportunity to comment on the SWMP.
2.	3.1 Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Waters, and Structural Controls – Annually Review MS4 Map	MET GOAL. The map was evaluated, and no updates were needed in Permit Year 6.
2.	4.1 Training for Illicit Discharge Detection & Elimination – hold one training session annually	MET GOAL. The MS4 held one training session on June 18, 2024, through a webinar.
2.	5.1 Public Reporting Using Utility Bill Inserts – Advertise contact information annually	MET GOAL. A total of 1,503 stormwater educational inserts were distributed to the community, which included the MS4 District Operator's telephone number for users in the MS4 to report illicit discharges and other potential pollution concerns.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
2.	6.1 Responding to Illicit Discharges & Spills – respond to 100% of reported potential illicit discharges	MET GOAL. Even though no (0) illicit discharges were reported during Permit Year 6, the MS4 has a program in place to respond to all reports and conduct the appropriate actions that concern illicit discharges and spills.
2.	6.2 Source Investigation of Illicit Discharges – investigate 100% of reported potential illicit discharges	MET GOAL. Even though no (0) illicit discharges were reported during Permit Year 6, the MS4 has a program in place to gather the appropriate information, prioritize potential risk, and assess the situation of alleged illicit discharges.
2.	6.3 Source Elimination of Illicit Discharges – eliminate 100% of reported potential illicit discharges	MET GOAL. Even though no (0) illicit discharges were reported during Permit Year 6, the MS4 has a program in place to gather the appropriate information, prioritize potential risk, and assess the situation of alleged illicit discharges.
2.	7.1 Evaluate the Rate Order for Illicit Discharges – review and continue implementing	MET GOAL. The MS4 formally adopted a revised Rate Order in Permit Year 3, and no changes were proposed in Permit Year 6.
3.	3.1 Evaluate the Rate Order for Construction Site Stormwater Runoff Control – review and continue implementing	MET GOAL. The MS4 formally adopted a revised Rate Order in Permit Year 3, and no changes were proposed in Permit Year 6.
3.	4.1 Construction Site Plan Review – review 100% of applicable site plan	MET GOAL. No (0) construction drawings were received and reviewed on applicable projects during Permit Year 6, so there was no need for construction site plan reviews in accordance with the Construction General Permit TPDES TXR150000.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
3.	5.1 Construction Site Inspection & Enforcement – inspect 100% of applicable construction sites	MET GOAL. No (0) construction site inspections needed to be performed. If there had been active construction sites, the Construction Inspector would have inspected the construction sites during the preliminary stages to ensure all BMPs are properly installed.
3.	6.1 Training for Construction Site Stormwater Runoff Control – hold one training session annually	MET GOAL. The MS4 training session was conducted on June 18, 2024, through a webinar.
3.	7.1 Guidance Manual for Construction Site Stormwater Runoff Control – continue utilizing	MET GOAL. The MS4 continued to utilize "Construction Site and Post-Construction Runoff Controls Stormwater Permit and Stormwater Quality Plan Guidelines" by Fort Bend County to aid in implementing construction site BMPs.
4.	3.1 Evaluate the Rate Order to Address Post Construction Runoff – review and continue implementing	MET GOAL. The MS4 formally adopted a revised Rate Order in Permit Year 3, and no changes were proposed in Permit Year 6.
4.	4.1 Guidance Manual for Post-Construction Stormwater Controls – continue implementing	MET GOAL. The MS4 continued to utilize "Construction Site and Post-Construction Runoff Controls Stormwater Permit and Stormwater Quality Plan Guidelines" by Fort Bend County to aid in implementing post-construction BMPs.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
4.	5.1 Inspection Program for Post-Construction Stormwater Controls – inspect 100% of completed construction sites	MET GOAL. No (0) post-construction inspections needed to be performed on applicable projects to ensure permanent structural controls were properly constructed reducing the potential impact of illicit discharges.
4.	6.1 Training for Post-Construction Stormwater Controls – hold one training session annually	MET GOAL. The MS4 training session was conducted on June 18, 2024, through a webinar.
5.	3.1 Inventory of Facilities & Stormwater Structural Controls – maintain and update	MET GOAL. The MS4 inventory list was evaluated, and a splash pad was added during Permit Year 6.
5.	4.1 Training for Pollution Prevention & Good Housekeeping – hold one training session annually	MET GOAL. The MS4 Training Program was conducted on June 18, 2024, through a webinar.
5.	5.1 Disposal of Waste – document number of spill response kits	MET GOAL. The MS4 provided one (1) spill response kit for their use to prevent illicit discharges from entering the storm sewer system. The MS4 ensured all waste materials removed are properly disposed of and do not contribute as pollutants within the MS4.
5.	6.1 Contractor Oversight – Implementation Phase	MET GOAL. In Permit Year 4, the MS4 began to include text to use in new contractors' legal documents stating their work will not have a negative effect on the storm sewer system nor will their stormwater runoff will not be considered an illicit discharge. No (0) new contracts were executed in Permit Year 6.

MCM(s)	Measurable Goal(s)	Explain progress toward goal or how goal was achieved. If goal was not accomplished, please explain.
5.	7.1 Municipal Operation & Maintenance Activities – summarize O&M activities	MET GOAL. The MS4's Emergency Spill Response Plan was evaluated, and no revisions were needed in Permit Year 6. The MS4 continued to reference written inspection and follow-up procedures for illicit discharges, construction stabilization measures, and municipal facilities, when needed. Additionally, the MS4 reviewed the list of potential pollutants of concern and pollution prevention measures for the facilities listed in the inventory list in BMP 5.3.1; no changes were recommended. A site inspection was conducted at the MS4's lift station in Permit Year 6. No incidents of non-compliance were observed.

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.?

Due to allocated resources the MS4 did not conduct sampling or analytical monitoring. The MS4 has provided qualitative information as proof of successfully achieving the measurable goals and benchmarks.

The MS4's Emergency Spill Response Plan was evaluated, and no changes were needed in Permit Year 6. The MS4 continued to reference written inspection and follow-up procedures for illicit discharges, construction stabilization measures, and municipal facilities, as needed. Additionally, the MS4 reviewed the list of possible pollutants of concern and pollution prevention measures for the facilities listed in the inventory list in BMP 5.3.1; no changes were recommended. A site inspection was conducted at the MS4's lift station in Permit Year 6. No incidents of non-compliance were observed during this time.

D. Impaired Waterbodies

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

Fort Bend County MUD 165 MS4 discharges indirectly to unclassified segment 1014B – Buffalo Bayou/Barker Reservoir. This classified segment is not listed in the 2024 EPA-approved 303(d) list but is listed in the 2024 Texas Integrated Report – Index of Water Quality Impairments. This is not a newly identified impaired waterbody and has been included in the MS4's Stormwater Management Program. The parameter of impairment and of concern is bacteria. No newly listed impaired waterbodies have been added that are within the permitted MS4 area.

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.

   All BMPs included in the MS4's SWMP have measurable goals focused on reducing pollutants of concern that may contribute to the impairment in waterbodies. All focused BMPs are scheduled to be fully implemented by the end of Permit Year 6.

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

   All BMPs outlined in the MS4's SWMP target residents, businesses, commercial and industrial facilities that reside within the MS4's jurisdiction. The BMPs focus on detecting, addressing, and eliminating impairments caused by bacteria and other illicit discharges.

   The MS4 will continue to implement the BMPs outlined in the SWMP. If concerning pollutants are observed in future permit years, the MS4 will refer to the TCEQ-approved Implementation Plan and determine if additional BMPs are needed to prevent illicit discharges from impacting the environment. All BMPs are scheduled to be evaluated in the next permitting year to ensure program effectiveness and success. If no progress is observed towards adhering to the target control and meeting the benchmark parameter, the MS4 will identify alternative BMPs that address new or increased efforts towards the benchmark.

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

Benchmark Parameter	Benchmark Value*	Description of additional sampling or other assessment activities	Year(s) conducted
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Public outreach efforts reduce the probability of bacteria resulting from illicit discharges.	Permit Year 6 (2024)

Benchmark Parameter	Benchmark Value*	Description of additional sampling or other assessment activities	Year(s) conducted
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Restricting illicit discharges reduce the probability of bacteria resulting from illicit discharges.	Permit Year 6 (2024)
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Restricting illicit discharges from construction runoff reduces the probability of bacteria entering the storm sewer inlets.	Permit Year 6 (2024)
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Reviewing construction drawings for BMPs, which address erosion and sediment controls, reduces the probability of bacteria entering the storm sewer system.	Permit Year 6 (2024)
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Inspecting construction sites for illicit discharges reduces the probability of bacteria entering the storm sewer system.	Permit Year 6 (2024)
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Utilizing the guidance manual assists in the implementation of erosion and sediment controls, soil stabilization, and BMPs.	Permit Year 6 (2024)
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Restricting illicit discharge from post-construction runoff reduces the probability of bacteria entering the storm sewer inlets.	Permit Year 6 (2024)
Bacteria (E.Coli) for 1014B	482.44 Billion MPN/Day in stormwater runoff	Evaluating completed construction sites to ensure structural controls were properly installed reduces the probability of bacteria entering the storm sewer system.	Permit Year 6 (2024)

*Value obtained from *Implementation Plan for Seventy-Two Total Maximum Daily Loads for Bacteria in the Houston-Galveston Region*

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

Benchmark Parameter	Selected BMP	Contribution to achieving Benchmark
Bacteria	Public Education Program - Educational Materials and Public Outreach Efforts	Educational materials raise awareness of stormwater quality concerns and encouraged public reporting of illicit discharges are identified. The MS4's inlet marking program provided involvement in the SWMP and encouraged participants to report illicit discharges and other environmental concerns.
Bacteria	Illicit Discharge and Elimination Program	The MS4 responded to all reported illicit discharges and environmental concerns. These incidents were fully documented and remediated to the maximum extent practicable. No (0) illicit discharges were reported in the MS4 in Permit Year 6.
Bacteria	Construction Site Plan Review and Site Inspections	Restricting illicit discharges from construction activities reduced the probability of pollutants entering the storm sewer system. Performing reviews on construction drawings and inspections on construction projects ensured that appropriate BMPs were being implemented to minimize the discharge of possible impairments.
Bacteria	Municipal Operations and Good Housekeeping Practices	Routine maintenance and inspection procedures of MS4 facilities assisted in minimizing illicit discharges. If minor spills occur, the MS4 has immediate use of one (1) spill response kit.

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

Description of bacteria-focused BMP	Comments/Discussion
Sanitary Sewer Systems	The MS4 monitors and maintains their sanitary sewer system and, if needed, improvements are made to reduce overflows and address any inadequacies. These maintenance issues can also include the lift station and sanitary sewer lines.

Description of bacteria-focused BMP	Comments/Discussion
On-site Sewage Facilities (for entities with appropriate jurisdiction)	No on-site sewage facilities are knowingly located within the MS4. The MS4 does not have jurisdiction over septic systems within their service area nor do they allow on-site sewage facilities within their MS4.
Illicit Discharge and Dumping	In accordance with the MS4's Rate Order, the District Operator for the MS4 will continue to inspect commercial users with an approved grease trap and/or grit inceptor.
Animal Sources	Zoos, horse stables, and other animal housing facilities are not knowingly located with Fort Bend County MUD No. 165. The MS4 will be mindful of these types of facilities should they be in their jurisdiction in the future and will include them in the distribution of stormwater quality education material that discuss animal waste. In this permit year's stormwater quality insert, the MS4 encourages its residents to pick up their pet waste and dispose of it properly. The MS4 will continue to relay this message in their annual public education insert.
Residential Education	The MS4 provides basic guidelines regarding proper pool and spa drainage in the annual stormwater quality public education insert. The MS4 is assessing methods to educate their residents about fats, oils and grease clogging sanitary sewer lines and possibly causing overflows. This information may be included in future public education inserts. Additionally, the MS4 will continue to educate their residents about proper pet waste disposal.

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

Benchmark Indicator	Description/Comments
Number of Illicit Discharges Reported	Even though no (0) illicit discharges were reported during Permit Year 6, the MS4 has a program in place to respond to all reports and conduct the appropriate actions that concern illicit discharges and spills.

Benchmark Indicator	Description/Comments
Number of Educational Materials Distributed to the Community	A total of 1,503 stormwater education materials were mailed to residents within the MS4 service area. The information addressed good housekeeping principles and pollution prevention measures. It also provided a phone number for residents to report illicit discharges.

E. Stormwater Activities

Describe activities planned for the next reporting year:

In accordance with TCEQ's regulatory guidance, the activities listed below are a continuation of Permit Year 6 Best Management Practices as stated in the Permittee's TCEQ-approved Stormwater Management Program.

MCM(s)	BMP	Stormwater Activity	Description/Comments
1	1.3.1	Utility Bill Inserts	Update/revise the education material, as needed, and distribute education material to 100% of the community.
1	1.4.1	Storm Drain Marking	Continue to offer volunteers the opportunity to place markers and report the quantity.
1	1.5.1	Opportunity for Public Comment	Continue to hold monthly public meetings where the public can address questions/comments about the SWMP.
2	2.3.1	Maps of Inlets, Storm Sewer Lines, Outfalls, Surface Waters & Structural Controls	Update/revise if new data related to the storm sewer system is identified.
2	2.4.1	Training for Illicit Discharge Detection & Elimination	Hold at least one (1) training session annually and offer the training program to appropriate staff.
2	2.5.1	Public Reporting Using Utility Bill Inserts	Advertise the current contact information for the MS4 and distribute to 100% of the MS4 annually.

MCM(s)	BMP	Stormwater Activity	Description/Comments
2	2.6.1	Responding to Illicit Discharges & Spills	Respond to 100% of reported illicit discharges annually.
2	2.6.2	Source Investigation of Illicit Discharges	Investigate 100% of reported illicit discharges.
2	2.6.3	Source Elimination of Illicit Discharges	Eliminate 100% of reported illicit discharges, if applicable.
2	2.7.1	Evaluate the Rate Order for Illicit Discharges	Review Rate Order and continue implementing.
3	3.3.1	Evaluate the Rate Order for Construction Site Stormwater Runoff Control	Review Rate Order and continue implementing.
3	3.4.1	Construction Site Plan Review	Continue to conduct plan reviews on 100% of applicable submittals.
3	3.5.1	Construction Site Inspections & Enforcement	Continue to conduct construction site inspections on 100% of applicable construction sites.
3	3.6.1	Training for Construction Site Stormwater Runoff Control	Hold at least one (1) training session annually and offer the training program to appropriate staff.
3	3.7.1	Guidance Manual for Construction Site Stormwater Runoff Control	Continue utilizing the guidance manual to aid in implementing construction site BMPs, as necessary.
4	4.3.1	Evaluate the Rate Order to Address Post-Construction Runoff	Review Rate Order and continue implementing.
4	4.4.1	Guidance Manual for Post-Construction Stormwater Controls	Continue utilizing the guidance manual to aid in implementing post-construction site BMPs, as necessary.

MCM(s)	BMP	Stormwater Activity	Description/Comments
4	4.5.1	Inspection Program for Post-Construction Stormwater Controls	Continue to conduct inspections on 100% of applicable projects, as needed.
4	4.6.1	Training for Post-Construction Stormwater Controls	Hold at least one (1) training session annually and offer the training program to appropriate staff.
5	5.3.1	Inventory of Facilities & Stormwater Structural Controls	Continue to maintain an MS4 inventory list of 100% MS4-owned facilities and stormwater structural controls and update, as needed.
5	5.4.1	Training for Pollution Prevention & Good Housekeeping	Hold at least one (1) training session annually and offer the training program to appropriate staff.
5	5.5.1	Disposal of Waste	Continue to ensure spill response kits are still available for the MS4. Ensure all waste is properly disposed and does not contribute as illicit material.
5	5.6.1	Contractor Oversight	Finalize language to insert in legal documents for new MS4 contractors to use the appropriate BMPs, control measures, and/or standard operating procedures to minimize potential runoff pollution.
5	5.7.1	Municipal Operation & Maintenance Activities	Identify and evaluate all operation and maintenance activities for their potential to discharge pollutants in stormwater.

F. SWMP Modifications

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

   _X_Yes____No

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

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

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

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

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

G. Additional BMPs for TMDLs and I-Plans

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

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

H. Additional Information

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

   ___ Yes _X_ No

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

2.a. Is the permittee part of a group sharing a SWMP with other entities?

___ Yes _X_ No

2.b. If "yes," is this a system-wide annual report including information for all permittees? N/A

___ Yes ___ No

I. Construction Activities

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

____0____

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

___ Yes _X_ No

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

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

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

J. Certification

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

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

Name (printed): Christine Oliver

Title: President

Signature: CLO

Date: 3/13/2025

Name of MS4: **Fort Bend County MUD 165 MS4**