

# Stormwater Management Program



## Hidalgo County Drainage District No. 1

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## ACRONYMS

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BMP .....	Best Management Practice
CGP .....	Construction General Permit
ETJ .....	Extraterritorial Jurisdiction
HCDD1 ...	Hidalgo County Drainage District No. 1
ILA.....	Interlocal Agreement
MCM.....	Minimum Control Measurement
MEP .....	Maximum Extent Practicable
MS4 .....	Municipal Separate Storm Sewer System
NOI .....	Notice of Intent
NPDES....	National Pollutant Discharge Elimination System
O&M.....	Operations & Maintenance
OSSF .....	On-Site Sewage Facility
POC.....	Pollutants of Concern
SSO .....	Sanitary Sewer Overflows
SOP.....	Standard Operating Procedures
SWP3....	Stormwater Pollution Prevention Plan
SWMP....	Stormwater Management Program
TAC .....	Texas Administrative Code
TCEQ.....	Texas Commission on Environmental Quality
TMDL .....	Total Maximum Daily Load
WLA .....	Wasteload Allocation
WQS .....	Water Quality Standards

## DEFINITIONS

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**Benchmarks** – A benchmark pollutant value is a guidance level indicator that helps determine the effectiveness of chosen best management practices (BMPs). This type of monitoring differs from “compliance monitoring” in that exceedances of the indicator or benchmark level are not permit violations, but rather indicators that can help identify problems at the Municipal Separate Storm Sewer System (MS4) with exposed or unidentified pollutant sources; or control measures that are either not working correctly, whose effectiveness need to be re-considered, or that need to be supplemented with additional BMP(s).

**Best Management Practices (BMPs)** – Schedules of activities, prohibitions of practices, maintenance procedures, structural controls, local ordinances, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures, and practices to control runoff, spills or leaks, waste disposal, or drainage from raw material storage areas.

**Catch Basins** – Storm drain inlets and curb inlets to the storm drain system. Catch basins typically include a grate or curb inlet that may accumulate sediment, debris, and other pollutants.

**Control Measure** – Any BMP or other method used to prevent or reduce the discharge of pollutants to water in the state.

**Discharge** – When used without a qualifier, refers to the discharge of stormwater runoff or certain non-stormwater discharges as allowed under the authorization of this general permit.

**General Permit** – A permit issued to authorize the discharge of waste into or adjacent to water in the state for one or more categories of waste discharge within a geographical area of the state or the entire state as provided by Texas Water Code (TWC) § 26.040.

**Illicit Connection** – Any man-made conveyance connecting an illicit discharge directly to a municipal separate storm sewer.

**Illicit Discharge** – Any discharge to an MS4 that is not entirely composed of stormwater, except discharges pursuant to this general permit or a separate authorization and discharges resulting from emergency fire-fighting activities.

**Impaired Water** – A surface water body that is identified as impaired on the latest U.S. Environmental Protection Agency (EPA) approved Clean Water Act (CWA) § 303(d) List or waters with an EPA approved or established TMDL that are found on the latest EPA approved Texas Integrated Report of Surface Water Quality for CWA Sections 305(b) and 303(d) which lists the category 4 and 5 water bodies.

**Implementation Plan (I-Plan)** – A detailed plan of action that describes the measures or activities necessary to achieve the pollutant reductions identified in the total maximum daily load (TMDL). Page 8 2024 Small MS4 General Permit Part I

**Infeasible** – For the purpose of this permit, infeasible means not technologically possible, or not economically practicable and achievable in light of best industry practices. The TCEQ notes that it does not intend for any small MS4 general permit requirement to conflict with state water right laws.

**Maximum Extent Practicable (MEP)** – The technology-based discharge standard for MS4s to reduce pollutants in stormwater discharges that was established by the CWA § 402(p). A discussion of MEP as it applies to small MS4s is found in 40 CFR § 122.34. **MS4 Operator** – For the purpose of this permit, the public entity or the entity contracted by the public entity, responsible for management and operation of the small municipal separate storm sewer system that is subject to the terms of this general permit.

**Municipal Separate Storm Sewer System (MS4)** – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

- (a) Owned or operated by the U.S., a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over the disposal of sewage, industrial wastes, stormwater, or other wastes,

including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under the CWA § 208 that discharges to surface water in the state;

(b) That is designed or used for collecting or conveying stormwater;

(c) That is not a combined sewer; and

(d) That is not part of a publicly owned treatment works (POTW) as defined in 40 CFR § 122.2. **Non-traditional Small MS4** – A small MS4 that often cannot pass ordinances and may not have the enforcement authority like a traditional small MS4 would have to enforce the stormwater management program. Examples of non-traditional small MS4s include counties, transportation authorities (including the Texas Department of Transportation), municipal utility districts, drainage districts, military bases, prisons, and universities. Page 9 2024 Small MS4 General Permit Part I

**Notice of Intent (NOI)** – A written submission to the executive director from an applicant requesting coverage under this general permit.

**Outfall** – A point source at the point where a small MS4 discharges to Waters of the U.S. and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels, or other conveyances that connect segments of the same stream or other Waters of the U.S. and are used to convey Waters of the U.S. For the purpose of this permit, sheet flow leaving a linear transportation system without channelization is not considered an outfall. Point sources such as curb cuts; traffic or right-of-way barriers with drainage slots that drain into open culverts, open swales, or an adjacent property, or otherwise not actually discharging into Waters of the U.S. are not considered an outfall.

**Permittee** – The MS4 operator authorized under this general permit. **Point Source** – (from 40 CFR § 122.22) any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

**Pollutant(s) of Concern (POCs)** – For the purpose of this permit, includes biochemical oxygen demand (BOD), sediment or a parameter that addresses sediment (such as total suspended solids (TSS), turbidity or siltation), pathogens, oil and grease, and any pollutant that has been identified as a cause of impairment of any water body that will receive a discharge from an MS4. (Definition from 40 CFR § 122.32(e)(3)).

**Redevelopment** – Alterations of a property that changed the “footprint” of a site or building in such a way that there is a disturbance of equal to or greater than one acre of land. This term does not include such activities as exterior remodeling, routine maintenance activities, and linear utility installation.

**Stormwater and Stormwater Runoff** – Rainfall runoff, snow melt runoff, and surface runoff and drainage.



**Stormwater Management Program (SWMP)** – A comprehensive program to manage the quality of discharges from the MS4. **Structural Control (or Practice)** – A pollution prevention practice that requires the construction of a device, or the use of a device, to capture or prevent pollution in stormwater runoff. Structural controls and practices may include but are not limited to wet ponds, bioretention, infiltration basins, stormwater wetlands, silt fences, earthen dikes, drainage swales, vegetative lined ditches, vegetative filter strips, sediment traps, check dams, subsurface drains, storm drain inlet protection, rock outlet protection, reinforced soil retaining systems, gabions, and temporary or permanent sediment basins. **Surface Water in the State** – Lakes, bays, ponds, impounding reservoirs, springs, rivers, streams, creeks, estuaries, wetlands, marshes, inlets, canals, the Gulf of Mexico inside the territorial limits of the state (from the mean high water mark (MHW) out 10.36 miles into the Gulf), and all other bodies of surface water, natural or artificial, inland or coastal, fresh or salt, navigable or nonnavigable, and including the beds and banks of all water courses and bodies of surface water, that are wholly or partially inside or bordering the state or subject to the jurisdiction of the state. Waters in treatment systems which are authorized by state or federal law, regulation, or permit, and which are created for the purpose of waste treatment are not considered to be water in the state.

**Total Maximum Daily Load (TMDL)** – The total amount of a substance that a water body can assimilate and still meet the Texas Surface Water Quality Standards.

**Traditional Small MS4** – A small MS4 that can pass ordinances and have the enforcement authority to enforce the stormwater management program. An example of traditional MS4s includes cities.

**Urban Area** – A statistical geographic entity consisting of a densely settled core created from census blocks and contiguous qualifying territory that together have at least 2,000 housing units or 5,000 persons as defined and used by the U.S. Census Bureau in the 2020 Decennial Census.

# 1 BASIC SWMP INFORMATION

This Storm Water Management Program (SWMP) Document was developed by **Hidalgo County Drainage District No.1** to describe the activities and control measures conducted to meet the terms and conditions of NPDES Permit #TXR040000.

The District is categorized under Level 2b: Operators of all non-traditional small MS4s such as counties, drainage districts, transportation entities, military bases, universities, colleges, correctional institutions, municipal utility districts and other special districts regardless of population served within the “urban area with a population of at least 50,000 people”, unless the non-traditional MS4 can demonstrate that it meets the criteria for a waiver from permit coverage based on the population served.

The portion of the small MS4 that is required to meet the conditions of this general permit are those portions that are located within the urban area with a population of at least 50,000 people as defined and used by the U.S. Census Bureau in the 2000, 2010, or 2020 Decennial Censuses, as well as any portion of the small MS4 that is designated by TCEQ.

## 1.1 Applicant Information

Hidalgo County Drainage District No. 1  
902 North Doolittle Road, Edinburg, Texas 78542 | 956-292-7080  
CN: 600701510  
RN: 105591697  
Contact Name: Raul E. Sesin, PE, CFM | raul.sesin@hcdd1.org

## 1.2 Organization

Hidalgo County Drainage District No. 1 (“District,” “HCDD1”) was created in 1908. It covers approximately 802 square miles. The center of the District is located near Latitude 26° 30' 55.55" N and Longitude -98° 12' 86.11" W. The regional topography is flat. The Census Bureau does not take specific population data for Districts such as this.

HCDD1 is governed by a Board of Directors, consisting of the County Commissioners, with the County Judge serving as the President of the Board. The General Manager is responsible for the oversight of all day-to-day operations. The District has a full-time staff of 206 people, who are responsible for engineering, surveying, finance, accounting, procurement, and operating services. The District hires consultants to assist with legal and tax assessment services, and hires consultants for engineering and surveying services, and other services when needed.

## 1.3 Infrastructure/District Operations

The District is responsible for facility management and maintenance of drainage waterways of District owned or maintained facilities. In-house staff are responsible for all operations, maintenance and regulatory compliance of those facilities.

## 1.4 Construction and Development of Drainage Infrastructure

New development and construction within the District are regulated by several entities, including various Cities, Hidalgo County, and the District. Incorporated areas are regulated by their respective City; however, a proposed outfall to a District system is regulated by the District.

Infrastructure in the ETJ's is regulated by the City, County and District. Infrastructure in unincorporated areas of the County is regulated by the County and District.

## 1.5 Program Funding

The District will fund this program through its Operation and Maintenance (O&M) account, based on revenue generated from ad-valorem property taxes.

## 1.6 Reporting Year

The reporting year is the calendar year. The first year will start on the day on which the Notice of Intent (NOI) is submitted and ends on December 31. Subsequent years will be January 1 – December 31 of the same calendar year.

## 1.7 Receiving Waters

The waterbodies identified in Table 1 receive storm water discharges from the Hidalgo County Drainage District No. 1 MS4. The District does not have required actions to address discharges to impaired waters or TMDLs as outlined in Permit Part 4.

**Table 1 Receiving Water Summary**

Receiving Waterbody Segments	Segment ID	WQS Classification	Impairment/Pollutant of Concern	TMDLs? (Yes/No)	Applicable WLAs (Yes/No)
Laguna Madre	2491_01	5b	Depressed Dissolved Oxygen In water	No	No
	2491_02	5r	Bacteria in Water (Rec Use)	No	No
	2491_02	5b	Depressed Dissolved Oxygen In water	No	No
North Floodway	2491B_01	5r	Bacteria in Water (Rec Use)	No	No
Drain ditches flowing into Lower Laguna Madre	2491C_01	5r	Bacteria in Water (Rec Use)	No	No
Arroyo Colorado Tidal	2201_01	5r	Bacteria in Water (Rec Use)	No	No
	2201_02	5r	Bacteria in Water (Rec Use)	No	No
	2201_03	5r	Bacteria in Water (Rec Use)	No	No
	2201_04	5r 5r	Bacteria in Water (Rec Use) Depressed Dissolved Oxygen In water	No	No
	2201_05	5r 5r 5c 5c	Bacteria in Water (Rec Use) Depressed Dissolved Oxygen In water Mercury in edible tissue PCBs in edible tissue	No	No
Arroyo Colorado Above Tidal	2202_01	5r 5c 5c	Depressed Dissolved Oxygen In water Mercury in edible tissue PCBs in edible tissue	Yes	No
	2202_02	5r 5c 5c	Depressed Dissolved Oxygen In water Mercury in edible tissue PCBs in edible tissue	Yes	No
	2202_03	5r 5c 5c	Depressed Dissolved Oxygen In water Mercury in edible tissue PCBs in edible tissue	Yes	No
	2202_04	5r 5c 5c	Depressed Dissolved Oxygen In water Mercury in edible tissue PCBs in edible tissue	Yes	No



Hidalgo County Drainage District No. 1's MS4 is also interconnected with other MS4s; however, the receiving waters are those as shown in Table 1.

### **1.8 SWMP Information and Statistics**

The District will maintain a method of gathering, tracking, and using SWMP information to set priorities, and assess Permit compliance (Permit Part 2.5.6).

To track compliance with the SWMP, the District is required to submit an annual report to TCEQ. The annual report will provide a summary of all BMP's implemented throughout the course of each permit year as outlined in the Minimum Control Measures. The SWMP and annual reports will be available for viewing on the District website.

Residents in the District have the opportunity to participate in the SWMP. Activities include, but are not limited to participation in Board Meetings, reporting of illicit discharges, and clean up events.

### **1.9 Transfer of Ownership, Operational Authority, or Responsibility for SWMP Implementation**

The District will implement the required SWMP control measures of this Permit in all new areas added or transferred to the District's MS4 (or for which a District becomes responsible for implementation of storm water quality controls) as expeditiously as practicable, but not later than one (1) year from addition of the new areas (Permit Part 2.5.8.).

The District will update its boundary through annexations from time to time. These annexations are typically done during the subdivision process in which new developments require a stormwater outfall. Upon annexation of an area, HCDD1 will update its boundary maps and be responsible for the implementation of stormwater quality controls.

Additionally, the District will update its system map upon approval of Interlocal Agreements (ILA) with various Irrigation Districts for which HCDD1 will take responsibility for drainage ditches. Upon execution of the Interlocal Agreement, HCDD1 will update its infrastructure map and be responsible for the maintenance of the system.

## **2 MAP OF THE SEPARATE STORM SEWER SYSTEM**

Hidalgo County Drainage District No. 1 is comprised of an area of approximately 802 square miles in Hidalgo County, including all the major cities in the County. The topography for the area is relatively flat terrain sloping in an easterly direction. Although the District does not encompass all of Hidalgo County, it serves about 90% of the populated area. The District owns and maintains 362 miles of Ditches and is also responsible for the maintenance of 418 miles of Ditches through Interlocal Agreements with various Irrigation Districts. Unlike cities, the drainage system is not primarily an underground system of inlets and pipes, the facilities are mostly composed of a system of unlined earthen ditches. Reference Attachment 1 for Maps of the District.

### 3 LEGAL AUTHORITY AND ENFORCEMENT

As a non-traditional small MS4, the District is not authorized by the State Constitution or State Statutes to enact ordinances, but has certain enforcement authority by the General Permit, such as the authority to assess civil monetary penalties, to control and supervise the construction and maintenance of its drainage ditches, and to inspect. The District is a political subdivision of the State of Texas governed by Texas Water Code Chapters 49 and 56. The District will exert inspection and enforcement authority to the extent allowable under state and local law.

The District is located within the County of Hidalgo; therefore, construction in the District must comply with the County rules and regulations. In addition, drainage plans must meet the rules and regulations of Hidalgo County and the District. It is not feasible to enter into interlocal agreements with the various MS4 operators. However, the District shall exert enforcement authority as required by the General Permit and to the extent allowable under the law for its facilities, employees, contractors, and any other entity over which it has operational control in its jurisdiction. The District shall notify adjacent MS4 operators with enforcement authority as needed to report discharges or incidents that the District cannot enforce.

The District will inspect new construction with outfalls to a District system, drainage construction projects administered by the District, and existing District drainage systems.

### 4 STORM WATER CONTROL MEASURES TO REDUCE POLLUTANTS TO THE MAXIMUM EXTENT PRACTICABLE

The following sections describe Hidalgo County Drainage District No. 1's program to reduce pollutants in the MS4 discharges to the maximum extent practicable, as required by Permit Part 3. Each section summarizes the mandatory program and describes how HCDD1 meets each program component.

#### Minimum Control Measure 1: Public Education and Outreach

To educate members of the public to learn about pollutants in storm water and similarly significant issues, HCDD1 must conduct an ongoing education and outreach. Within one year of the Permit effective date, HCDD1 must, at a minimum:

- ✓ Select at least one audience and focus its efforts on conveying relevant messages.
- ✓ Target specific educational material to the construction/engineering/design community regarding construction site runoff control and permanent storm water controls.
- ✓ Maintain and advertise a publicly accessible website to provide all relevant SWMP materials.

#### 1.1 District Website

The District will promote stormwater educational materials, most recent annual report, and SWMP on the district website: <https://www.hcdd1.org>. The target audience is residents and District consultants.

#### Measurable Goals

- The District will maintain a webpage with current, accurate information and working links.

- All links will be checked, and the page will be updated as necessary at a minimum of once annually.
- The website must be maintained for the full year, each year.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Upload SWMP	Within one month of submittal
Upload 2024 Annual Report	Within one month of submittal

<b>Year 2 Action</b>	<b>Deadline</b>
Verify functionality of links in conjunction with Annual Report and SWMP	March 31, 2026
Upload 2025 Annual Report	March 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Verify functionality of links in conjunction with Annual Report and SWMP	March 31, 2027
Upload 2026 Annual Report	March 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Verify functionality of links in conjunction with Annual Report and SWMP	March 31, 2028
Upload 2027 Annual Report	March 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Verify functionality of links in conjunction with Annual Report and SWMP	March 31, 2029
Upload 2028 Annual Report	March 31, 2029

#### **1.2 Educational Media Campaign**

The District will develop and maintain a social media campaign. The post(s) may describe potential sources of pollution as well as ways to prevent pollution. The posts(s) will be reviewed annually and updated as the need arises. Target audience will be residents of the District.

#### **Measurable Goals**

- Post a minimum of four times each year on a minimum of one social media platform.
- The message must address ways attendees can minimize or avoid adverse stormwater impacts or practices to improve the quality of stormwater runoff.
- The messages must be seasonally appropriate.
- Posts must be visible to the public of the full year each year.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Investigate method of tracking effectiveness of social media posts	December 31, 2025
Prepare educational material for social media postings	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Post spring education material on social media	March 15, 2026
Post summer education material on social media	June 15, 2026
Post fall education material on social media	September 15, 2026
Post winter education material on social media	December 15, 2026
Implement tracking system	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Post spring education material on social media	March 15, 2027
Post summer education material on social media	June 15, 2027
Post fall education material on social media	September 15, 2027
Post winter education material on social media	December 15, 2027
Implement tracking system	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Post spring education material on social media	March 15, 2028
Post summer education material on social media	June 15, 2028
Post fall education material on social media	September 15, 2028
Post winter education material on social media	December 15, 2028
Implement tracking system	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Post spring education material on social media	March 15, 2029
Post summer education material on social media	June 15, 2029
Post fall education material on social media	September 15, 2029
Post winter education material on social media	December 15, 2029
Implement tracking system	December 31, 2029

### 1.3 Educational Meetings, Seminars or Trainings

The District will develop meetings, seminars or trainings to promote the reduction of stormwater pollution and encourage the audience to share what they have learned with others.

#### Measurable Goals

- Hold, host, or promote a minimum of one event annually.
- The event will address ways attendees can minimize or avoid adverse impacts to stormwater or practices to improve the quality of stormwater runoff.
- These events may address different pollutants and audiences.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Identify an annual event to hold, host, or promote	December 31, 2025
Investigate method of tracking effectiveness	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Hold, host, or promote an event	December 31, 2026
Implement method of tracking effectiveness	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Hold, host, or promote an event	December 31, 2027
Implement method of tracking effectiveness	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Hold, host, or promote an event	December 31, 2028
Implement method of tracking effectiveness	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Hold, host, or promote an event	December 31, 2029
Implement method of tracking effectiveness	December 31, 2029

### 1.4 Permanent Stormwater Related Signage

The District will develop stormwater related signage and require developers to install signage at each new development to educate specific audiences.

#### Measurable Goals

- Place signage in a location where the message is relevant, and highly visible to target audience.
- Signage will count as annual BMP for the year it was put in place and for each subsequent year of this permit cycle as long as each of those years, the permittee inspects and maintains, as necessary, 100% of the signage once annually.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Investigate existing signage	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
If no signage exists, develop signage and select appropriate location	December 31, 2026
If signage exists, inspect and maintain signage	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
If no signage exists, install signage	December 31, 2027
Inspect signage annually	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Inspect signage annually	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Inspect signage annually	December 31, 2029

## **Minimum Control Measure 2: Public Involvement and Participation**

To involve members of the public to learn about pollutants in storm water and similarly significant issues, HCDD1 must conduct an ongoing public involvement program. HCDD1 must also comply with applicable State and local public notice requirements when implementing any public involvement activities.

### **2.1 Clean Up Events**

Clean Up events raise awareness about environmental issues and encourages others to adopt more sustainable practices. They also remove trash which helps to create safer, healthier environments.

#### **Measurable Goals**

- Host at least two events annually.
- For consideration, the land area cleaned must be at least:
  - ❖ Two (2) acres
  - ❖ 400 yards of stream, streambank, riparian area, or
  - ❖ Two (2) miles of roadside
- Considerations may be combined, such as one acre of land and 200 yards of stream are covered.

## **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Investigate method of tracking effectiveness	December 31, 2025
Identify locations to hold events	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Implement method of tracking effectiveness	December 31, 2026
Host a minimum of two events annually	December 31, 2026
Advertise meeting	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review advertising method	December 31, 2027
Host a minimum of two events annually	December 31, 2027
Advertise meeting	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review advertising method	December 31, 2028
Host a minimum of two events annually	December 31, 2028
Advertise meeting	December 31, 2028



<b>Year 5 Action</b>	<b>Deadline</b>
Review advertising method	December 31, 2029
Host a minimum of one event annually	December 31, 2029
Advertise meeting	December 31, 2029

## **2.2 Educational Display / Booth**

Educational Displays / Booths are an important tool in promoting public awareness and engagement in stormwater management. They not only raise awareness about the impacts of pollutants, but they also provide opportunities for face-to-face interaction.

### **Measurable Goals**

- Create one booth or display annually at a school, public event, or similar event that provides information or displays to improve public understanding of issues related to water quality.
- Staff the booth or display when the event is open to the public.

## **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Select the event(s) for which to set up a display/booth	December 31, 2025
Identify staff resources needed for the event	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Set up and staff display/booth at selected event	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Set up and staff display/booth at selected event	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Set up and staff display/booth at selected event	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Set up and staff display/booth at selected event	December 31, 2029

## **2.3 Public Input Meeting**

Public input meetings offer several benefits for stormwater management, including increased public support, enhanced understanding of community needs, and improved project outcomes.

### **Measurable Goals**

- Host at least one meeting annually for input on the program implementation such as city council meetings, Board Meeting, or stakeholder meetings.
- Event advertisement must reach at least 75% of the intended audience.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Investigate method of tracking effectiveness	December 31, 2025
After plan is approved, hold at least one annual meeting for input on program	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Implement method of tracking effectiveness	December 31, 2026
Hold at least one annual meeting for input on program	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Implement method of tracking effectiveness	December 31, 2027
Hold at least one annual meeting for input on program	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Implement method of tracking effectiveness	December 31, 2028
Hold at least one annual meeting for input on program	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Implement method of tracking effectiveness	December 31, 2029
Hold at least one annual meeting for input on program	December 31, 2029

## Minimum Control Measure 3: Illicit Discharge Detection and Elimination

Illicit discharges and illegal dumping pose a threat to water quality. The District will develop and implement BMPs aiming to prevent, reduce, track, and eliminate illicit discharges.

### 3.1 MS4 Map

Having an up-to-date map is an important part of a functioning IDDE program. It provides the District with the ability to track the source of an illicit discharge when found, as well as giving the ability to coordinate inspections. The District currently has an up-to-date MS4 map.

### Measurable Goals

- The District will annually review the MS4 map and update it, as necessary, at least one time annually to include features which have been added, removed, or changed.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Review district map and update as necessary	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review district map and update as necessary	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review district map and update as necessary	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review district map and update as necessary	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review district map and update as necessary	December 31, 2029

### **3.2 Training for Field Staff**

Trained field staff are important in both discovery as well as tracking and eliminating illicit discharges. Training may be conducted in person or using self-paced training materials such as videos or reading materials.

#### **Measurable Goals**

- The District will conduct a minimum of one training annually for 100% of field staff that may come into contact with or otherwise observe illicit discharge, illegal dumping, or illicit connection to the MS4 as part of their normal job responsibilities.

### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2025
Provide training to all required field staff	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2026
Provide training to all required field staff	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2027
Provide training to all required field staff	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2028
Provide training to all required field staff	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2029
Provide training to all required field staff	December 31, 2029

### **3.3 Maintain and Publicize a Public Reporting Method**

District staff are important to reporting illicit discharges, during their scheduled maintenance activities. Additionally, residents serve as a means of reporting illicit discharges. It is important to provide a mechanism for the residents to report illicit discharges when they occur. The District currently has a reporting mechanism in place.

## Measurable Goals

- Maintain a minimum of one public reporting mechanism 100% of the time during the permit term.
- Publicize the public reporting mechanism a minimum of two times annually in a method designed to reach at least 75% of the intended audience.
- If the MS4 has a public website, the public reporting mechanism must be publicized on the public website 100% of the time during the reporting period.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Respond to all complaints submitted via reporting mechanism	Ongoing
Publicize reporting mechanism	December 31, 2025
Investigate a method of tracking effectiveness of advertising	December 31, 2025
Verify reporting mechanism annually	December 31, 2025
Post mechanism to website	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Respond to all complaints submitted via reporting mechanism	Ongoing
Publicize reporting mechanism	December 31, 2026
Implement tracking mechanism	December 31, 2026
Verify reporting mechanism annually	December 31, 2026
Verify reporting mechanism is posted on website	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Respond to all complaints submitted via reporting mechanism	Ongoing
Publicize reporting mechanism	December 31, 2027
Implement tracking mechanism and review effectiveness	December 31, 2027
Verify reporting mechanism annually	December 31, 2027
Verify reporting mechanism is posted on website	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Respond to all complaints submitted via reporting mechanism	Ongoing
Publicize reporting mechanism	December 31, 2028
Implement tracking mechanism and review effectiveness	December 31, 2028
Verify reporting mechanism annually	December 31, 2028
Verify reporting mechanism is posted on website	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Respond to all complaints submitted via reporting mechanism	Ongoing

Publicize reporting mechanism	December 31, 2029
Implement tracking mechanism and review effectiveness	December 31, 2029
Verify reporting mechanism annually	December 31, 2029
Verify reporting mechanism is posted on website	December 31, 2029

### 3.4 Develop and Maintain Response Procedures

Permittees must develop and maintain procedures for responding to illicit discharges, illegal dumping, and spills.

#### Measurable Goals

- Review and update procedures at least once annually to address changes and make improvements to the established procedures where applicable.

### IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Develop response procedures	December 31, 2025

Year 2 Action	Deadline
Review and update response procedures	December 31, 2026

Year 3 Action	Deadline
Review and update response procedures	December 31, 2027

Year 4 Action	Deadline
Review and update response procedures	December 31, 2028

Year 5 Action	Deadline
Review and update response procedures	December 31, 2029

### 3.5 Source Investigation and Elimination of Illicit Discharges and Illegal Dumping

Locating and eliminating illicit discharges is one of the items the District is effectively able to do to directly reduce pollutants from entering nearby waterbodies. Having an effective program is imperative to keep nearby waterbodies clean.

#### Measurable Goals

- The District will respond to 100% of known illicit discharges and illegal dumping incidents each year to investigate sources.
- The District will respond to 100% of high priority discharges, such as sanitary sewer overflows (SSOs), within 24 hours.
- The District will notify either the appropriate agency or TCEQ of 100% of illicit discharges or illegal dumping where the District does not have jurisdiction.
- The District will notify TCEQ immediately of 100% of Illicit flows believed to be an immediate threat to human health or the environment throughout the permit term.

### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
All operational aspects of illicit discharge tracking and elimination program	December 31, 2025
<b>Year 2 Action</b>	<b>Deadline</b>
All operational aspects of illicit discharge tracking and elimination program	December 31, 2026
<b>Year 3 Action</b>	<b>Deadline</b>
All operational aspects of illicit discharge tracking and elimination program	December 31, 2027
<b>Year 4 Action</b>	<b>Deadline</b>
All operational aspects of illicit discharge tracking and elimination program	December 31, 2028
<b>Year 5 Action</b>	<b>Deadline</b>
All operational aspects of illicit discharge tracking and elimination program	December 31, 2029

### 3.6 Corrective Action

Permittees must contact the responsible party to eliminate illicit discharges and illegal dumping.

#### Measurable Goals

- The District must notify the responsible party of the problem with 24 hours, for 100% of illicit discharges or illegal dumping where a source has been determined.
- The District will require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge.

### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Develop procedures to contact responsible party	December 31, 2025
<b>Year 2 Action</b>	<b>Deadline</b>
Contact responsible parties, where source was determined	December 31, 2026
<b>Year 3 Action</b>	<b>Deadline</b>
Contact responsible parties, where source was determined	December 31, 2027
<b>Year 4 Action</b>	<b>Deadline</b>
Contact responsible parties, where source was determined	December 31, 2028



<b>Year 5 Action</b>	<b>Deadline</b>
Contact responsible parties, where source was determined	December 31, 2029

### **3.7 Inspection Procedures and Inspections**

Permittees must develop inspection procedures for illicit discharges and illegal dumping.

#### **Measurable Goals**

- Review and update procedures at least once annually to address changes and make improvements to the established procedures where applicable.
- Conduct inspections in response to 100% of complaints each year according to the established procedures or notify the appropriate agency with authority to act.
- Conduct follow up inspections in 100% of cases each year where necessary as described in the established procedures.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Develop response procedures	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and update response procedures	December 31, 2026
Conduct inspections and follow up inspections	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and update response procedures	December 31, 2027
Conduct inspections and follow up inspections	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and update response procedures	December 31, 2028
Conduct inspections and follow up inspections	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and update response procedures	December 31, 2029
Conduct inspections and follow up inspections	December 31, 2029

### **Minimum Control Measure 4: Construction Site Runoff Control**

Runoff from construction sites is a significant contributor of pollutants to waterbodies. The District is required to enforce, to the extent allowable by state, federal and local laws, the Texas Construction General Permit TXR15000 within its boundaries, and notify appropriate authorities where unable to enforce. This will be completed via regulatory mechanisms such as plan review, training, construction inspection, and enforcement.

#### **4.1 Regulatory Mechanism to Prohibit Discharges**

The District is governed by the Texas Water Code Chapters 49 and 56. Chapter 56 Drainage Districts gives the District authorization to control and supervise the construction and maintenance of drainage ditches.

Currently, the District does not have rules in place regarding a regulatory mechanism to complete the requirements of the MS4. However, the District will review the current authority for enforcement and adopt an enforcement mechanism which gives the District the tools necessary to enforce compliance with TXR15000, such as the ability to review plans and conduct investigations on construction related activities in the ETJ and County. The District's role is reduced to only those projects which the District performs and / or manages. The enforcement mechanism will be reviewed annually and updated as necessary to ensure the District is able to minimize pollutants discharged from construction sites.

#### **Measurable Goals**

- The District will review enforcements at least once during the permit term to address changes and make improvements.
- Develop and maintain an enforcement mechanism to prohibit discharges.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Review current authority for enforcement	December 31, 2025
Update or create enforcement mechanism	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2029

#### **4.2 Maintain and Implement Plan Review**

The District will continue to develop, implement, and evaluate construction plan review procedures to prevent water quality impacts within the District. The District will determine if the necessary measures are being conducted in order to minimize the discharge of pollutants from construction sites. All construction plans will be reviewed to ensure the applicable Storm Water Pollution Prevention Plan (SWP3) has been developed in accordance with TPDES Construction General Permit (CGP) TXR 150000. The construction plans to be reviewed are those related to the projects which the District manages. Hidalgo County is responsible for all other site plan reviews.

#### **Measurable Goals**

- Review and update plan review procedures at least one time annually to address changes and make improvements to the established procedures.

- Implement review procedures for 100% of new construction plans received each year.

#### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Establish plan review procedures	December 31, 2025
Review 100% of submitted construction plans	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and update procedures	December 31, 2026
Review 100% of submitted construction plans	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and update procedures	December 31, 2027
Review 100% of submitted construction plans	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and update procedures	December 31, 2028
Review 100% of submitted construction plans	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and update procedures	December 31, 2029
Review 100% of submitted construction plans	December 31, 2029

#### 4.3 Construction Site Stormwater Training

The District will provide training to all staff who are responsible for implementing the construction site storm water runoff control program. The training will ensure the construction plan reviews and inspections are being conducted in order to minimize the discharge of pollutants from construction sites.

#### Measurable Goals

- Conduct a minimum of one training course annually for 100% of staff whose primary job duties are related to implementing the construction stormwater program.

#### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2025
Provide training to all required field staff	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2026
Provide training to all required field staff	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2027
Provide training to all required field staff	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2028
Provide training to all required field staff	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review training program and update, as necessary	December 31, 2029
Provide training to all required field staff	December 31, 2029

#### **4.4 Processing Information Received from Public**

The District will develop, implement and review procedures for receipt and consideration of information submitted by the public.

##### **Measurable Goals**

- The District will review and update procedures for the receipt and consideration of information submitted by the public at least once annually to address changes and make improvements to the established procedures where applicable.
- Maintain one webpage, hotline, or similar method for receipt of information submitted by the public throughout the permit term.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Develop procedures for receipt of information	December 31, 2025
Review and select method to receive information	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review procedures and update as necessary	December 31, 2026
Review and maintain method to receive information	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review procedures and update as necessary	December 31, 2027
Review and maintain method to receive information	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review procedures and update, as necessary	December 31, 2028
Review and maintain method to receive information	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review procedures and update, as necessary	December 31, 2029
Review and maintain method to receive information	December 31, 2029

#### **4.5 Construction Site Inspections**

With the understanding that construction sites can be major contributors to pollutants in nearby waterbodies, construction inspections and enforcement thereof is one of the

more direct ways to prevent pollution from reaching waterbodies available. The District will continue to inspect construction sites that require TXR150000 coverage during the active construction phase.

### Measurable Goals

- The District will develop and implement updated written procedures outlining the inspection and enforcement requirements. These procedures must be maintained onsite or in the SWMP.
- Conduct inspections at 80% of active construction sites annually according to the established procedures. At a minimum, inspections must:
  - ❖ Determine whether the site has appropriate coverage under the TPDES CGP, TXR150000. If no coverage exists, notify the permittee of the need for permit coverage.
  - ❖ Conduct a site inspection to determine if control measures have been selected, installed, implemented, and maintained according to requirements.
  - ❖ Assess compliance with rules and regulations.
  - ❖ Provide a written or electronic inspection report.
- Each year, conduct follow up inspections in 100% of cases where necessary, as described in the established procedures.

### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Develop and implement written procedures for inspection program	December 31, 2025
Conduct inspections on all active construction sites requiring coverage under TXR150000	December 31, 2025
Conduct follow-inspection on all inspections that require contractor action	December 31, 2025
<b>Year 2 Action</b>	<b>Deadline</b>
Conduct inspections on all active construction sites requiring coverage under TXR150000	December 31, 2026
Conduct follow-inspection on all inspections that require contractor action	December 31, 2026
<b>Year 3 Action</b>	<b>Deadline</b>
Conduct inspections on all active construction sites requiring coverage under TXR150000	December 31, 2027
Conduct follow-inspection on all inspections that require contractor action	December 31, 2027
<b>Year 4 Action</b>	<b>Deadline</b>
Conduct inspections on all active construction sites requiring coverage under TXR150000	December 31, 2028
Conduct follow-inspection on all inspections that require contractor action	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Conduct inspections on all active construction sites requiring coverage under TXR150000	December 31, 2029
Conduct follow-inspection on all inspections that require contractor action	December 31, 2029

## **Minimum Control Measure 5 - Post-Construction Site Stormwater Management in New Development and Redevelopment**

The District assumes ownership and maintenance responsibility of all post-construction stormwater controls. The maintenance of these controls not only allows for cleaner water leaving the District, but also potentially mitigates flooding.

### **5.1 Regulatory Mechanism**

The District will develop, implement, and enforce a program, to the extent allowable under state, federal, and local law, to control stormwater discharges from new development and redeveloped sites that discharge into the District MS4.

The District will develop, to extent allowable under state, federal, and local law and local standards, a regulatory mechanism to address post-construction runoff from new development and redevelopment projects. It will include the tools necessary to enforce various requirements such as post construction stormwater management goals. The mechanism will be reviewed annually and updated as necessary to ensure the District is able to minimize pollutants discharged from construction sites.

### **Measurable Goals**

- The District will review mechanism annually and update as necessary.

### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Review current authority for regulatory mechanism	December 31, 2025
Update or create regulatory mechanism	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and update as necessary	December 31, 2029



## 5.2 Document and Maintain records of Enforcement Actions

If any violations result in pollution, the District will take necessary action and will document and make those actions available to TCEQ upon request.

### Measurable Goals

- The District will maintain records of 100% of enforcement actions taken each year.
- The District will make 100% of enforcement records available to TCEQ for review within 24 hours of request.

### IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Document and maintain enforcement actions	December 31, 2025
Year 2 Action	Deadline
Document and maintain enforcement actions	December 31, 2026
Year 3 Action	Deadline
Document and maintain enforcement actions	December 31, 2027
Year 4 Action	Deadline
Document and maintain enforcement actions	December 31, 2028
Year 5 Action	Deadline
Document and maintain enforcement actions	December 31, 2029

## 5.3 Ensure Long Term Operation and Maintenance of Structural Stormwater Control Measures Installed

Having properly maintained and operational stormwater controls is important not only for pollution prevention but also for flood mitigation. The District will implement a long-term operation and maintenance schedule of stormwater control measures.

### Measurable Goals

- The District will maintain 100% of the stormwater control measures each year where the District is responsible for maintenance.
- Each year, the District will require 100% of the owners or operators of any new development or redevelopment sites to develop and implement a maintenance plan addressing maintenance requirement for any structural control measures installed onsite.
- The District will require the site owner or operators to maintain documentation onsite of 100% of the maintenance performed and made available for review by the District or TCEQ within 24 hours of request.

### IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Document and maintain stormwater control measures	December 31, 2025
Document and maintain records of maintenance plans for new development or redevelopment site	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Document and maintain stormwater control measures	December 31, 2026
Document and maintain records of maintenance plans for new development or redevelopment site	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Document and maintain stormwater control measures	December 31, 2027
Document and maintain records of maintenance plans for new development or redevelopment site	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Document and maintain stormwater control measures	December 31, 2028
Document and maintain records of maintenance plans for new development or redevelopment site	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Document and maintain stormwater control measures	December 31, 2029
Document and maintain records of maintenance plans for new development or redevelopment site	December 31, 2029

## **Minimum Control Measure 6 - Pollution Prevention and Good Housekeeping**

The District shall develop and implement an operation and maintenance program, including an employee training component that has the ultimate goal of preventing or reducing pollutant runoff from District activities and District owned areas including but not limited to: detention pond maintenance, fleet and building maintenance, stormwater system maintenance, new construction and land disturbances, District parking lots, vehicle and equipment maintenance and storage yards, and waste transfer stations.

### **6.1 Permittee-Owned Facilities and Control Inventory**

Facilities and other municipal operations within the District pose potential threats to water quality. An inventory gives the District the ability to easily view facilities in which operations are made. This aids in planning and inspection coordination.

#### **Measurable Goals**

- The District will develop and maintain an annual inventory for 100% of the District owned and operated facilities and controls in the District.
- The District will review and update the inventory at least one time annually to address changes or additions to the facilities and controls where applicable.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Develop an inventory of District owned and operated facilities	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and update inventory	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and update inventory	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and update inventory	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and update inventory	December 31, 2029

## 6.2 Good Housekeeping Training and Education

The District will provide training for all staff who are responsible for implementing good housekeeping practices. The training will ensure the construction site plan reviews and site inspections are being conducted to minimize the discharge of pollutants from construction sites.

### Measurable Goals

- The District will conduct at minimum one training annually for 100% of employees involved in implementing pollution prevention and good housekeeping practices.
- The District will provide training to 100% of contract staff who are contracted with good housekeeping at least one time annually with contract language or another similar method.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Develop good housekeeping training for staff	December 31, 2025
Determine best method to provide training to contract staff	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and update training material	December 31, 2026
Provide training to staff	December 31, 2026
Provide training to contract staff	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and update training material	December 31, 2027
Provide training to staff	December 31, 2027
Provide training to contract staff	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and update training material	December 31, 2028
Provide training to staff	December 31, 2028
Provide training to contract staff	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and update training material	December 31, 2029
Provide training to staff	December 31, 2029
Provide training to contract staff	December 31, 2029

### **6.3 Disposal of Waste Material**

The District will ensure that waste is disposed of in accordance with 30 Texas Administration Code (TAC) Chapters 330 and 335.

#### **Measurable Goals**

- The District will review facility O&M for compliance with TAC 330 and 335 and will update if changes are necessary.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Review O&M and update if necessary	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review O&M and update if necessary	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review O&M and update if necessary	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review O&M and update if necessary	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review O&M and update if necessary	December 31, 2029

### **6.4 Contractor Requirements Oversight**

The District will provide Contractor oversight during construction activities to ensure Contractors use the appropriate control measures and standard operating procedures (SOPs).

#### **Measurable Goals**

- Each year, the District will ensure that 100% of contractors hired by the District to perform maintenance activities on District owned facilities are contractually required to comply with all the stormwater control measures, good housekeeping practices, and facility-specific stormwater management operating procedures.

- The District will provide oversight of 100% of contractor activities to ensure that contractors are using appropriate control measures and SOPs each year.
- The District will maintain oversight procedures onsite 100% of the time and make them available for review by TCEQ within 24 hours of request.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Review contract language and update if necessary	December 31, 2025
Provide oversight of contracted maintenance activities	December 31, 2025
Maintain procedures onsite	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review contract language and update if necessary	December 31, 2026
Provide oversight of contracted maintenance activities	December 31, 2026
Maintain procedures onsite	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review contract language and update if necessary	December 31, 2027
Provide oversight of contracted maintenance activities	December 31, 2027
Maintain procedures onsite	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review contract language and update if necessary	December 31, 2028
Provide oversight of contracted maintenance activities	December 31, 2028
Maintain procedures onsite	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review contract language and update if necessary	December 31, 2029
Provide oversight of contracted maintenance activities	December 31, 2029
Maintain procedures onsite	December 31, 2029

#### **6.5 District Operations and Maintenance Activities**

The District will evaluate operation and maintenance activities for their potential to discharge pollutants in stormwater including but not limited to road and parking lot maintenance, bridge maintenance, cold weather operations, and right of way maintenance.

#### **Measurable Goals**

- The District will evaluate 100% of O&M activities above for their potential to discharge pollutants in stormwater annually.

#### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Evaluate O&M activities	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Evaluate O&M activities	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Evaluate O&M activities	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Evaluate O&M activities	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Evaluate O&M activities	December 31, 2029

## 6.6 Identify Pollutants of Concern

The District will evaluate operation and maintenance activities for their potential to discharge pollutants in stormwater including but not limited to road and parking lot maintenance, bridge maintenance, cold weather operations, and right of way maintenance.

### Measurable Goals

- The District will identify the pollutants of concern and maintain a list of 100% of pollutants identified. Examples include metals, chlorides, hydrocarbons (benzene, toluene, ethyl benzene, and xylenes), sediment, and trash.
- The District will review and update the pollutants of concern list at least one time annually to address changes or additions to the O&M activities where applicable.

### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Identify pollutants of concern.	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Maintain list of pollutants of concern	December 31, 2026
Update list of pollutants of concern	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Maintain list of pollutants of concern	December 31, 2027
Update list of pollutants of concern	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Maintain list of pollutants of concern	December 31, 2028
Update list of pollutants of concern	December 31, 2028



<b>Year 5 Action</b>	<b>Deadline</b>
Maintain list of pollutants of concern	December 31, 2029
Update list of pollutants of concern	December 31, 2029

### **6.7 District Operations and Maintenance Activities**

The District will evaluate operation and maintenance activities for their potential to discharge pollutants in stormwater including but not limited to road and parking lot maintenance, bridge maintenance, cold weather operations, and right of way maintenance.

#### **Measurable Goals**

- The District will develop and implement a set of pollution prevention measures that will reduce the discharge of pollutants in stormwater from O&M activities. They must include at least two of the following:
  - ❖ Track 100% of the application of deicing and anti-icing compounds and record amount of compound used annually.
  - ❖ Place barriers around or conduct runoff away from 100% of deicing chemical storage areas to prevent discharge into surface waters each year.

### **IMPLEMENTATION SCHEDULE**

<b>Year 1 Action</b>	<b>Deadline</b>
Review and maintain a list of pollutants of concern	December 31, 2025
Develop two pollution prevention measures to adopt	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Review and maintain a list of pollutants of concern	December 31, 2026
Implement two pollution prevention measures	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Review and maintain a list of pollutants of concern	December 31, 2027
Implement two pollution prevention measures	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review and maintain a list of pollutants of concern	December 31, 2028
Implement two pollution prevention measures	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review and maintain a list of pollutants of concern	December 31, 2029
Implement two pollution prevention measures	December 31, 2029

### **6.8 Inspections of Facilities**

The District will develop written procedures for inspections of District owned facilities.

### Measurable Goals

- At least one time annually, the District will visually inspect 100% of pollution prevention measures implemented at the District owned facility to ensure they are working properly.
- The District will develop and maintain written procedures that describe the frequency of inspections and how they will be conducted.
- The District will review and update the inspection procedures at least one time annually to address changes or additions to the pollution prevention measures.
- The District will maintain a log of 100% of the inspections conducted annually and make the log available for review by the TCEQ within 24 hours of a request.

### IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Develop inspection procedures for pollution prevention measures	December 31, 2025

Year 2 Action	Deadline
Visually inspect pollution prevent measures	December 31, 2026
Maintain, update, and log inspection procedures	December 31, 2026

Year 3 Action	Deadline
Visually inspect pollution prevent measures	December 31, 2027
Maintain, update, and log inspection procedures	December 31, 2027

Year 4 Action	Deadline
Visually inspect pollution prevent measures	December 31, 2028
Maintain, update, and log inspection procedures	December 31, 2028

Year 5 Action	Deadline
Visually inspect pollution prevent measures	December 31, 2029
Maintain, update, and log inspection procedures	December 31, 2029

### 6.9 Maintain Structural Controls

The District will develop written procedures and maintain structural controls.

### Measurable Goals

- At least one time annually perform maintenance of 100% of the structural controls which require maintenance. Must be consistent with maintaining effectiveness of the BMP.
- The District will develop and maintain written procedures that describe the frequency of inspections and how they will be conducted.
- The District will review and update the maintenance procedures at least one time annually to address changes or additions to the pollution prevention measures.

## IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Develop procedures for maintenance of structural controls.	December 31, 2025

Year 2 Action	Deadline
Perform maintenance of structural controls	December 31, 2026
Maintain, update maintenance procedures	December 31, 2026

Year 3 Action	Deadline
Perform maintenance of structural controls	December 31, 2027
Maintain, update maintenance procedures	December 31, 2027

Year 4 Action	Deadline
Perform maintenance of structural controls	December 31, 2028
Maintain, update maintenance procedures	December 31, 2028

Year 5 Action	Deadline
Perform maintenance of structural controls	December 31, 2029
Maintain, update maintenance procedures	December 31, 2029

## Minimum Control Measure 7 – Industrial Stormwater Sources

This measure is not required since the District is a level 2b MS4 operator.

## Minimum Control Measure 8 – Authorization for Construction Activities where the small MS4 is the Site Operator

This measure is optional and not elected.

## Minimum Control Measure 9 – Additional Requirements for Impaired Waterbodies

Total Maximum Daily Loads TMDLs are formed, and waterbodies are marked as impaired when water quality samples show that the waterbodies are not meeting water quality standards. TMDLs define maximum amount of pollutants that are allowed in a body of water and can allocate numerical limits for dischargers, require BMPs, or allocate goals for dischargers. As the District is in the watershed of those bodies of water, the District is likely contributing to the impairment in some fashion, no matter how small, and therefore can take measures to reduce pollution of those priority pollutants.

### 9.1 Review of impairments and TMDLs

The District is not notified when an applicable impairment or TMDL is established. The District will review annually, in conjunction with the annual report, the most recently approved 303(d) list for impairments and review for any newly issued TMDLs in order to be protective of the watershed.

### Measurable Goals

- The District will annually review the most recently approved 303(d) list for updated impairments.
- The District will annually review for new TMDL updates.
- If a new impairment or TMDL is discovered, the District will review procedures and SWMP to determine if any additional BMPs are necessary and implement them within two years of impairment list update.

### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Review most recently approved 303(d) list	December 31, 2025
Review for new TMDL updates	December 31, 2025
Update SWMP with any additional BMPs in regard to new impairments/TMDLs	Within two years

<b>Year 2 Action</b>	<b>Deadline</b>
Review most recently approved 303(d) list	March 31, 2026
Review for new TMDL updates	March 31, 2026
Update SWMP with any additional BMPs in regard to new impairments/TMDLs	Within two years

<b>Year 3 Action</b>	<b>Deadline</b>
Review most recently approved 303(d) list	March 31, 2027
Review for new TMDL updates	March 31, 2027
Update SWMP with any additional BMPs in regard to new impairments/TMDLs	Within two years

<b>Year 4 Action</b>	<b>Deadline</b>
Review most recently approved 303(d) list	March 31, 2028
Review for new TMDL updates	March 31, 2028
Update SWMP with any additional BMPs in regard to new impairments/TMDLs	Within two years

<b>Year 5 Action</b>	<b>Deadline</b>
Review most recently approved 303(d) list	March 31, 2029
Review for new TMDL updates	March 31, 2029
Update SWMP with any additional BMPs in regard to new impairments/TMDLs	Within two years

### 9.2 Sanitary Sewer Systems

Faults in a sanitary sewer system can be major contributors of pathogens to a watershed. The District permits connections from effluent of wastewater treatment plants; however, the District does not own or operate sanitary sewer systems including treatment plants, or sanitary sewer lift stations. The District will respond to any sanitary sewer complaints

identified through the reporting mechanism and will implement additional BMPs if OSSFs are built on District property.

### Measurable Goals

- The District will review 100% of the sanitary sewer system outfalls in the impairment watershed to identify areas in need of improvement within two years.
- If the District constructs or operates a sanitary sewer lift station, the District will conduct weekly lift station inspections at 100% of the District owned lift stations.
- The District will investigate and address all sanitary sewer overflow complaints identified through the public reporting mechanism.
- The District will review sanitary sewer use requirements and consider implementing improvements to reduce blockages from fats, oils, and grease, as necessary.

### IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Begin review sanitary sewer system outfalls in the impairment watershed	December 31, 2025
Develop a weekly inspection program for all lift stations within the District, if a lift station is constructed	December 31, 2025
Investigate and address all SSO complaints submitted via reporting mechanism	Ongoing
Review sanitary sewer use requirements and update as necessary	December 31, 2025

Year 2 Action	Deadline
Review sanitary sewer system in the impairment watershed	December 31, 2026
Develop a weekly inspection program for all lift stations within the District, if a lift station is constructed	December 31, 2026
Investigate and address all SSO complaints submitted via reporting mechanism	Ongoing
Review sanitary sewer use requirements and update as necessary	December 31, 2026

Year 3 Action	Deadline
Review results of sanitary sewer review and identify and initiate all feasible and necessary improvement projects	December 31, 2027
Develop a weekly inspection program for all lift stations within the District, if a lift station is constructed	Ongoing

Investigate and address all SSO complaints submitted via reporting mechanism	Ongoing
Review sanitary sewer use requirements and update as necessary	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Review results of sanitary sewer review and identify and initiate all feasible and necessary improvement projects	December 31, 2028
Develop a weekly inspection program for all lift stations within the District, if a lift station is constructed	Ongoing
Investigate and address all SSO complaints submitted via reporting mechanism	Ongoing
Review sanitary sewer use requirements and update as necessary	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Review results of sanitary sewer review and identify and initiate all feasible and necessary improvement projects	December 31, 2029
Develop a weekly inspection program for all lift stations within the District, if a lift station is constructed	Ongoing
Investigate and address all SSO complaints submitted via reporting mechanism	Ongoing
Review sanitary sewer use requirements and update as necessary	December 31, 2029

### **9.3 On Site Sewage Facilities (OSSFs)**

The District does not have any OSSFs. The District will respond to any OSSF complaints identified through the reporting mechanism and will implement additional BMPs if OSSFs are built on District property.

#### **Measurable Goals**

- The District will respond to 100% of OSSF complaints submitted via the public reporting mechanism.
- In the event that an OSSF is built and operated in the District, the District will implement additional BMPs and update SWMP.

#### IMPLEMENTATION SCHEDULE

Years 1-5 Action	Deadline
Respond to 100% of OSSF complaints submitted via public reporting mechanism	December 31 of each year
In the event that an OSSF is built and operated in the District, the District will update SWMP in order to meet permit requirements	December 31 of each year

#### 9.4 Illicit Discharge and Dumping

Illicit discharges have the capacity to contribute to the bacteria levels leaving the District. The District will ensure that all regulatory mechanisms and procedures within MCM 3 contain elements addressing bacteria discharges from OSSFs, grease traps, and grit traps.

##### Measurable Goals

- The District will review MCM 3 and operating procedures and ensure that they address bacteria. The District will update procedures and regulatory mechanisms as needed.

#### IMPLEMENTATION SCHEDULE

Years 1-5 Action	Deadline
Review procedures for MCM 3 and regulatory mechanisms and update as needed	December 31 of each year

#### 9.5 Impairment for Bacteria

The District will implement at least one BMP in the SWMP because bacteria was identified as a POC.

##### Measurable Goals

- The following shall be implemented:
  - ❖ The District will assess and address, if feasible, 100% of complaints received about feral hogs within the MS4 area each year. If infeasible, the District will maintain documentation of the reason.

#### IMPLEMENTATION SCHEDULE

Year 1 Action	Deadline
Evaluate and select one measure to address Impairment from bacteria	December 31, 2025
Develop a maintenance program	December 31, 2025
Year 2 Action	Deadline
Implement measure	December 31, 2026
Review and update maintenance program	December 31, 2026



<b>Year 3 Action</b>	<b>Deadline</b>
Implement measure	December 31, 2027
Review and update maintenance program	December 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Implement measure	December 31, 2028
Review and update maintenance program	December 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Implement measure	December 31, 2029
Review and update maintenance program	December 31, 2029

## 9.6 Additional Public Education for Residents

There are many actions residents can take to reduce pathogens introduced to their watershed. Education of those actions can be a viable way to reduce those pathogens from entering nearby waterbodies.

### Measurable Goals

- The District will implement an additional public education BMP and ensure that at least the following BMP is implemented in MCM 1 focuses the following:
  - ❖ proper disposal of pet waste.

## IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Investigate method of tracking effectiveness	December 31, 2025
Research topic of need under the list of III.A.5.(e)	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Implement Method	June 30, 2026
Implement Method for tracking effectiveness	December 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Implement Method	March 31, 2027
Implement Method for tracking effectiveness	March 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Implement Method	March 31, 2028
Implement Method for tracking effectiveness	March 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Implement Method	March 31, 2029
Implement Method for tracking effectiveness	March 31, 2029

### 9.7 Progress Towards Benchmark

In the event that the District has benchmarks as defined by an applicable TMDL, the District will need to evaluate program implementation measures. The District may use items such as number of illicit discharges and illegal dumping, use of reporting hotline, number of educational opportunities provided, number of SSOs, and increase of detection through dry weather screening. The District will report progress toward benchmark with the annual report.

If by the end of the third year of the permit, the District observes no progress toward the benchmark, the District will identify alternative focused BMPs to develop and implement. Any alternative BMPs will be included in the annual report and SWMP.

### Measurable Goals

- The District will perform an assessment of activities to determine if the success of the measurable goals is likely meeting any benchmarks.
- The District will report progress toward applicable benchmarks in the annual report.
- The District will perform a review at the end of the third year of the permit and assess if additional/alternate BMPs are necessary.

### IMPLEMENTATION SCHEDULE

<b>Year 1 Action</b>	<b>Deadline</b>
Verify active benchmark(s)	December 31, 2025

<b>Year 2 Action</b>	<b>Deadline</b>
Perform assessment of activities in respect to any benchmarks	March 31, 2026
Report progress with annual report	March 31, 2026

<b>Year 3 Action</b>	<b>Deadline</b>
Perform assessment of activities in respect to any benchmarks	March 31, 2027
Report progress with annual report	March 31, 2027
Evaluate if progress is made toward benchmark and determine if additional BMPs are necessary.	March 31, 2027

<b>Year 4 Action</b>	<b>Deadline</b>
Perform assessment of activities in respect to any benchmarks	March 31, 2028

Report progress with annual report	March 31, 2028
Implement additional/alternate BMPs if necessary	March 31, 2028

<b>Year 5 Action</b>	<b>Deadline</b>
Perform assessment of activities in respect to any benchmarks	March 31, 2029
Report progress with annual report	March 31, 2029
Implement additional/alternate BMPs if necessary	March 31, 2029

## 5 REPORTING

There are a few instances where the District is required to prepare and submit reports as follows:

1. Noncompliance which may endanger human health or safety:
  - a. In the event of noncompliance which may endanger human health or safety or the environment, the District will provide an oral description or fax to the TCEQ regional Office within 24 hours of becoming aware of the noncompliance. A written report must be submitted to the appropriate TCEQ Regional Office and to the TCEQ Enforcement Division within the next five (5) days. The report must contain:
    - i. A description of the noncompliance and the cause;
    - ii. The potential danger to human health or safety or the environment;
    - iii. The period of noncompliance, including date and time;
    - iv. If not corrected, the anticipated time the noncompliance is expected to continue; and
    - v. Steps taken to reduce, eliminate, and prevent recurrence of the noncompliance.
2. Upon discovery of incomplete or incorrect information submittal, the District will submit facts or information to the executive director.
3. Annual Report:
  - a. The District will submit an annual report of the previous calendar year no later than March 31.
    - i. The first annual report will cover the period from which the NOI is submitted until the end of the calendar year.
  - b. The District will keep a copy of the annual report and have it ready for TCEQ review upon request.
  - c. The annual report will include:
    - i. Status of compliance with the permit conditions, a list of measurable goals, appropriateness of BMPs, progress toward goals, and an evaluation of success;
    - ii. A summary of the information collected and analyzed;
    - iii. A summary of activities taken to address pollutants of concern;
    - iv. Proposed changes to SWMP;
    - v. A summary of the stormwater activities the MS4 operator plans to undertake during the next permitting year;

- vi. A description of a schedule for implementation of additional BMPs that may be needed based on TMDLs and implementation plans;
- vii. Notice that the small MS4 operator is relying on another government entity to satisfy permit obligations, if applicable; and
- viii. The number of construction activities where the District is the Operator and the total number of acres disturbed.
- d. The District will supply an annual report regardless of approval of NOI.
- e. The annual report must be signed in accordance with 30 TAC 305.128 and submitted via NeTMS4 unless electronic reporting waiver is obtained.

### Measurable Goals

- The District will perform an assessment of the SWMP and activities conducted under it and submit a report no later than March 31 of the year following the reporting period.

### IMPLEMENTATION SCHEDULE

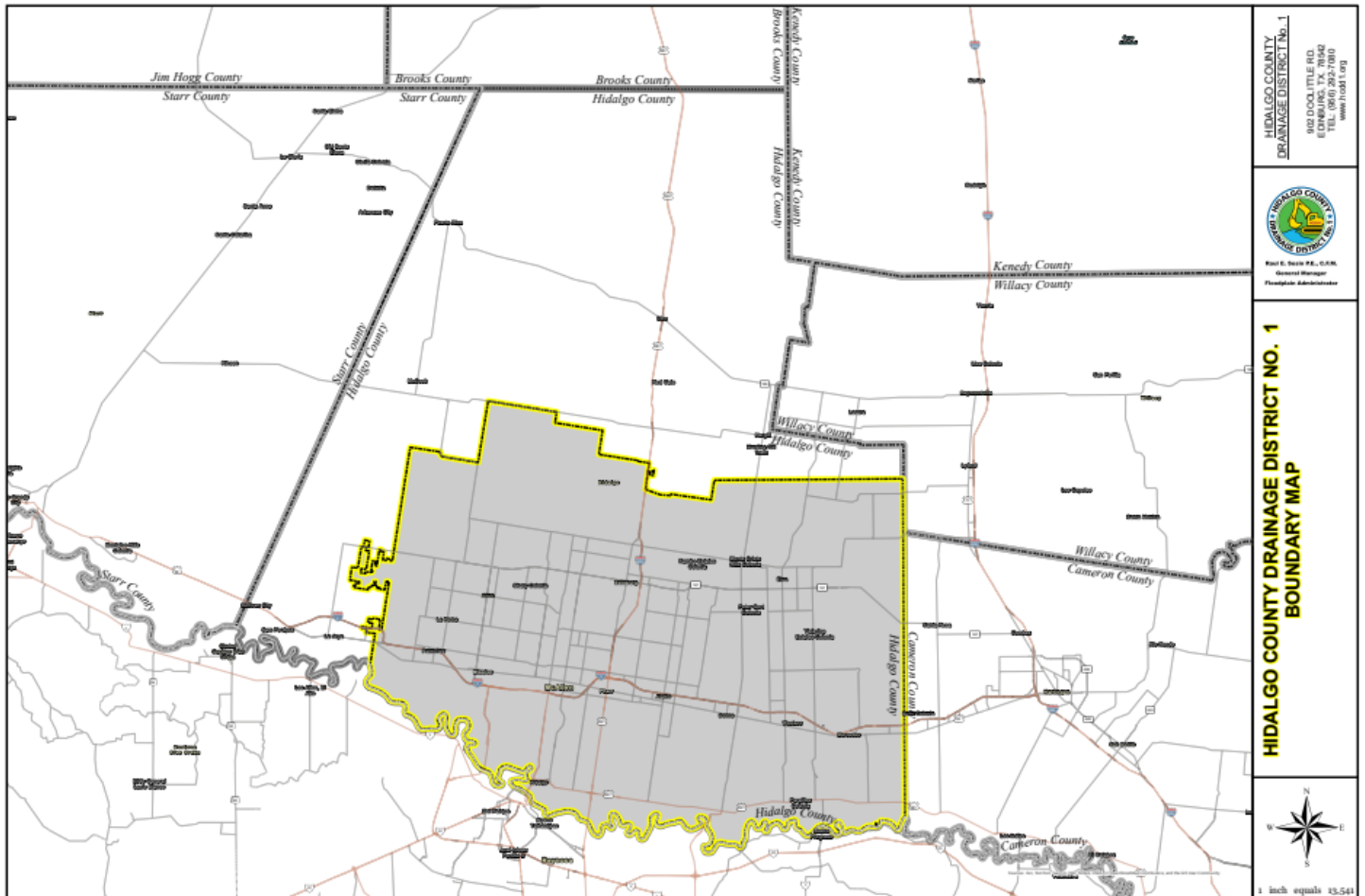
<b>Year 1 Action</b>	<b>Deadline</b>
Perform 2025 annual report	Three months from date of NOI submittal
<b>Year 2 Action</b>	<b>Deadline</b>
Review SWMP and change as necessary	March 31, 2026
Submit annual report	March 31, 2026
<b>Year 3 Action</b>	<b>Deadline</b>
Review SWMP and change as necessary	March 31, 2027
Submit annual report	March 31, 2027
<b>Year 4 Action</b>	<b>Deadline</b>
Review SWMP and change as necessary	March 31, 2028
Submit annual report	March 31, 2028
<b>Year 5 Action</b>	<b>Deadline</b>
Review SWMP and change as necessary	March 31, 2029
Submit annual report	March 31, 2029

# ATTACHMENT I

## MS4 STORMWATER INFRASTRUCTURE MAPS

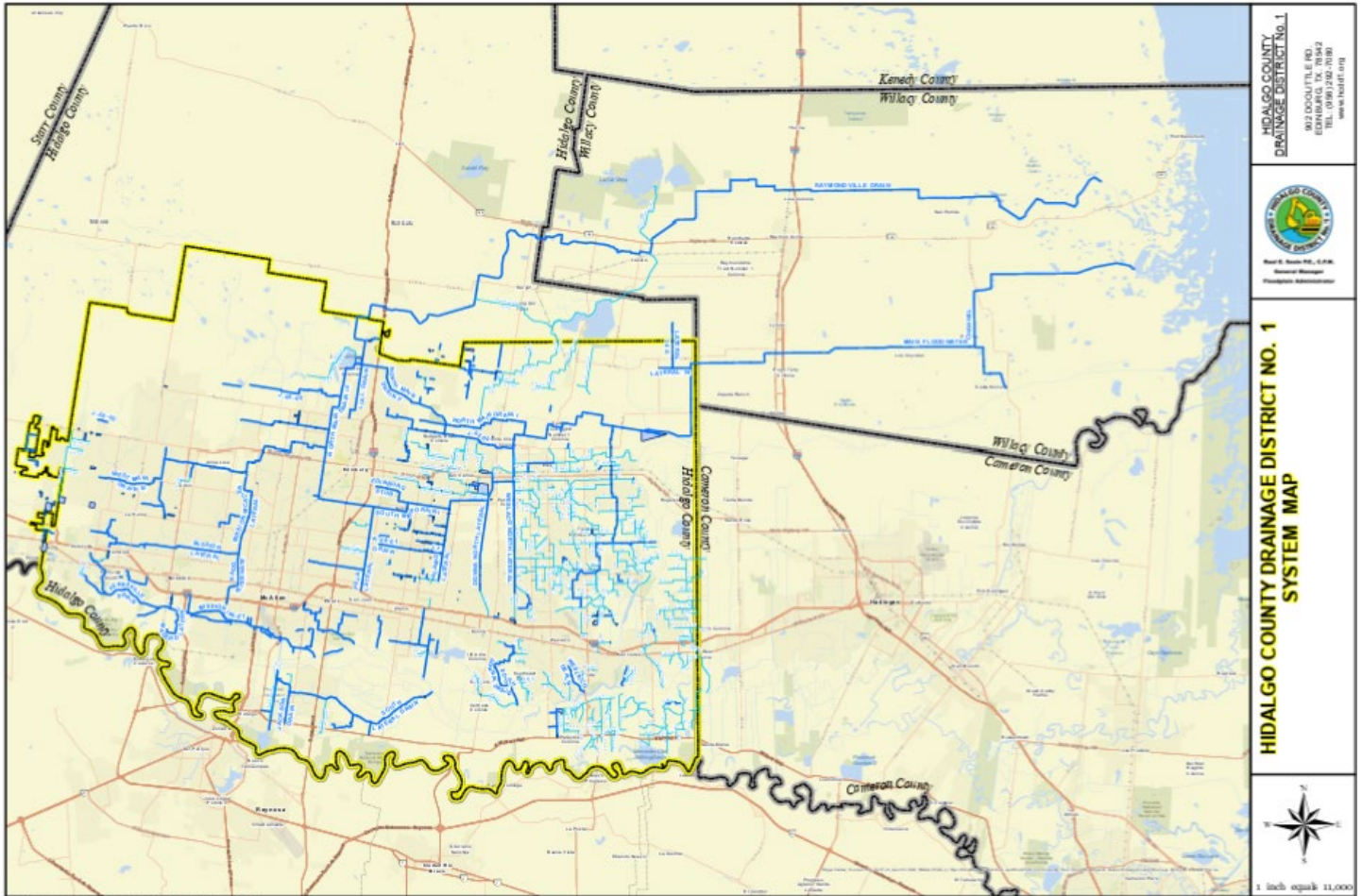
### Map 1 Hidalgo County Drainage District No. 1 Boundary Map

This exhibit identifies the boundary of Hidalgo County Drainage District No.1 within Hidalgo County.



## Map 2 Hidalgo County Drainage District No. 1 System Map

This exhibit identifies the Drainage Ditches owned and maintained by Hidalgo County Drainage District No.1. The dark blue color represents the ditches owned by the District; while the light blue color represents the ditches maintained by the District through an Interlocal Agreement.





## Drainage Outfalls

This exhibit identifies the elevations and relative topography surrounding the District, identifying the southeasterly to easterly overland flow in the area. Ground elevations are shown in red.

