MS4 Self-Assessment

Areas of New Development and Significant Re-Development Program

Module 7

Name of the Permittee: City of San Antonio	MS4 Permit Number: WQ0004284000
Assessment Period:	

Permittee Instructions: Please complete the worksheet below. Please note that upon opening this Module, some content may be disabled such as the capacity to check inside the "boxes." The content can usually be activated by pressing "Enable Content" which will appear below the Toolbar in "MS Office."

ATTACHMENTS REQUESTED	Document attached
1. Attach an organizational chart.	☑ YES ☐ NO
2. Attach a flow chart that illustrates how the enforcement plan is implemented. Plan for Enforcement regarding WQ Basins.	☑ YES ☐ NO
3. Attach an inspection report completed for two different facilities inspected by the permittee within the reporting period, to determine compliance with state/municipal permit requirements. Submit with each report, a photo of the each facility and any violations that were found.	☑ YES ☐ NO

AREAS OF NEW DEVELOPMENT AND SIGNIFICANT RE-DEVELOPMENT **Control Measure to reduce the discharge of pollutants from the MS4 which receive discharges, from areas of new development and significant re-development.**	
1. In accordance with 40 CFR §122.26 [Phase I] has the permittee developed a *Storm Water Management Program (SWMP),* that describes how the **Areas of New Development and Significant Re-Development** Control Measure will be implemented?	☑ YES ☐ NO
2. What pollutants of concern are targeted for reduction through the implementation of the **Area of New Development and Significant Re-Development** program?	
Response: Within the Edwards Aquifer Recharge Zone, developers are required by TCEQ to reduce Total Suspended Solids (TSS), generally by means of permanent best management practices (BMPs) such as sand filter basins, and underground filtration systems. Total Suspended Solids (TSS) are targeted for reduction throughout the City by having maximum allowable velocities for drainage channels and discharge points. The maximum velocities are set to help reduce erosion.	
ORGANIZATIONAL STRUCTURE	
1. Is there a storm water team in place to ensure that the **Areas of New Development and Significant Re-Development** program is properly implemented?	☑ YES ☐ NO
2. Describe the organizational structure and staff responsibilities to implement the **Areas of New Development and Significant Re-Development** program. Include the name, title, contact information, department name and key responsibilities of each team member.	

Response: Within the Transportation & Capital Improvements (TCI) Storm Water Engineering Division, there is a Floodplain Management group that reviews plats, building permits, master development plans, capital improvement projects, floodplain revisions, and floodplain permits. The current manager of the Floodplain Management team is Jacob Powell, P.E., (210) 207-0176, who reports to Art Reinhardt, P.E., Assistant Director (210) 207-7785. Within SAWS Aquifer Protection Department reviews Plats, WPAPs, AQPPs, and conducts Basin Inspections. SAWS- Aquifer Protection - Supervisor Michael Barr (210) 233-3522;Manager, Andrew Wiatrek 210-233-3572	
3. What co-permittee(s) or interagency departments will participate in the implementation of the **Areas of New Development and Significant Re-Development** program?	
Response: City of San Antonio Transportation & Capital Improvements (TCI); City of San Antonio Development Services Department (DSD); San Antonio River Authority; San Antonio Water System (SAWS)	
4. Describe any formal agreements and key responsibility shared by the permittee, co-permittee(s) and or interagency departments in the implementation of the **Areas of New Development and Significant Re-Development** program.	
Response: TCI works with DSD to coordinate permit, plat, and master development plan review. TCI works with SAWS when there are erosion concerns on private properties that affect adjacent properties. There is an Interlocal Agreement between the City of San Antonio (COSA) and the San Antonio River Authority (SARA) that allows SARA to provide additional review for development and redevelopments projects along the Museum Reach Urban Segment, Eagleland, and Mission Reach portions of the San Antonio River. SAWS has an Interlocal Agreement with COSA designating responsibility for Storm water components.	
5. Do program participants *(e.g., permittee, co-permittee, other departments)* meet regularly to discuss the progress of the **Areas of New Development and Significant Re-Development** program?	☑ YES ☐ NO
6. Describe the frequency of these meetings.	
Response: TCI meets with DSD and other key stakeholders monthly at Development Process Task Force (DPTF) meetings to discuss the efficiency of the development process, changes to review procedures, etc. TCI meets with SARA and other key stakeholders monthly at Watershed Technical Committee meetings to discuss drainage issues throughout the San Antonio River watershed within and around Bexar County. An annual budget meeting is held with the COSA and SAWS to discuss budget, positions and the overall program. There are other meetings held to discuss items as needed. Things such as changes to the SWMP, responsibilities, permit changes, annual reports and individual issues may cause additional meetings to coordinate as needed.	
LEGAL AUTHORITY	
1. Does the permittee have legal authority to implement and enforce the **Areas of New Development and Significant Re- Development** program?	☑ YES ☐ NO
2. What ordinances, codes, or policies provide this legal authority?	
Response: Requirements for development in San Antonio are found in the Unified Development Code (UDC). Development standards are found in Article V of the UDC.	
3. Does this legal authority *(e.g., ordinances, codes, and policies)* authorize the permittee to address storm water runoff from construction sites that disturb greater than or equal to 1 acre?	☑ YES ☐ NO
4. Does the permittee assess ordinances, policies, and programs that address storm water runoff quality?	☑ YES ☐ NO

5. Who *(e.g., specific staff, department, etc.)* has the authority to enforce this legal authority? Developers are encouraged to provide Low Impact Development (LID) design. When those designs are submitted, TCI Storm Water coordinates with the San Antonio River Authority to review the projects. Additionally, part of the regular review process for all development projects is to verify outfall velocities for drainage systems to reduce chances of erosion onto adjacent sites and into streams and floodplains.

FISCAL RESOURCES

1. What is the budget for the implementation of the **Areas of New Development and Significant Re-Development** Control Measure?	**REPORTING PERIOD**	**NEXT REPORTING PERIOD**
	1,838,430	**1,838,430**

SECTION I: MEASURABLE GOALS

1. What are the Measurable Goals for the **Areas of New Development and Re-Development** program? Include expected quantifiable results.

Measurable Goal 1	Minimize erosion caused by storm runoff at new developments and re-developments.
Expected Quantifiable Results	Reduce frequency of customer complaints (COSA 311 calls) near developments and re-developments.
Measurable Goal 2	Review plats, building permits, and CIP submittals in a timely manner.
Expected Quantifiable Results	Meet the service level goals agreed on by reviewing departments.
Measurable Goal 3	Confirmation of detention pond construction within city limits.
Expected Quantifiable Results	Goal of 100% receipt of Detention Pond Conformance Letters and Pond Maintenance Agreements.
Measurable Goal 4	SAWS conducts Water quality inspection over the Edwards Recharge Zone
Expected Quantifiable Results	Annual to Semi-Annual inspections to achieve compliance

2. Are these Measurable Goals described in the SWMP? ☐ YES ☑ NO

SECTION II: TRAINING/EDUCATION

STAFF

1. Does the permittee require staff *(e.g., storm water team, inspectors)* to complete special, continuous or annual training or obtain certification or licensing to implement and manage the **Areas of New Development and Significant Re-Development** program? ☑ YES ☐ NO

2. If yes, describe this applicable training, certification or licensing and the required frequency for each.

Response Hydrologic and hydraulic modeling; Low Impact Development (LID) workshops; and Natural Channel Design (NCD) workshops

INSPECTORS

1. Are inspectors trained on the storm water program that includes an overview of the storm water permit; review and approval process; BMPs; design; installation and maintenance; inspections; documenting findings and enforcement actions? ☑ YES ☐ NO

2. Briefly describe this type of training and the frequency.

Response: SAWS Construction Storm water EPS 2 positions requires levels of training for Storm

2. Briefly describe this type of training and the frequency.	
Response: SAWS Construction Storm water EPS 2 positions requires levels of training for Storm Water; most of the staff has obtained a CESSWI or a CISEC. In addition they may maintain a TCEQ license for Wastewater Collection Systems. Training is also done in house at weekly staff meetings. Items include permit requirements, inspection processes, webinars, and review of materials.	
CONSTRUCTION OPERATORS	
1. How has the permittee informed construction owners/operators of storm water permit requirements *(i.e., special events, website, hotlines, brochures, and television or radio ads)?*	
Response: TPDES Inspector Training Workshop, SAWS web site	
2. Does the permittee provide technical guidance *(e.g., BMPs manual or fact sheets)* to construction site owners/operators to increase their awareness and understanding about the storm water permit and MS4's building permit requirements?	☑ YES ☐ NO
Response: Materials are provided during the workshops and/or can be downloaded off the SAWS website.	
3. What technical guidance *(e.g., BMPs manual or fact sheets)* does the permittee provide to construction site owners/operators, guidance or standards for the design, selection and maintenance of nonstructural and structural post construction BMPs?	
Response: Construction operators/Engineers are directed TCEQ Edwards Aquifer Technical Guidance Manual when questions arise regarding types of allowable BMPs and design.	
4. Does the permittee provide training on the storm water program, which includes how to apply for storm water coverage and develop and implement a SWPPP, to construction operators, developers and engineers?	☑ YES ☐ NO
5. Does the permittee also provide training on BMP maintenance?	☑ YES ☐ NO
SECTION III: PLAN REVIEW AND APPROVAL	
1. How does the permittee review and approve storm water plans for **Areas of New Development and Re-Development**?	
Response: Developers submit construction plans and drainage reports to the City of San Antonio-Transportation & Capital Improvements (TCI) for review. Submittal requirements include a Storm Water Management Plan (SWMP) that analyzes whether there will be an adverse impact on infrastructure and habitable structures downstream from the site. TCI staff reviews the SWMP and associated construction plans to confirm that development will not have an adverse impact downstream. TCI staff also reviews revisions to the floodplains, including impact to properties and structures, and potential impacts to the floodplain itself (i.e., risk of erosion from increase velocities).	
2. How early in the planning process is storm water addressed *(e.g., conceptual planning stage)?*	
Response: There is preliminary storm water review during the Master Development Plan (MDP) stage prior to platting. There are subsequent opportunities for preliminary plan review prior to building permit submittal. There are multiple review timeframes for capital projects prior to final design and construction.	
3. Does the permittee have clear, specific Storm Water Design Standards?	☑ YES ☐ NO
4. Does the permittee provide a Storm Water Design Standards guidance to construction operators that includes the following subject matter? (Check all that apply)	
a. set minimally acceptable BMP and sizing criteria?	☑ YES ☐ NO
b. address source controls as well as treatment controls?	☑ YES ☐ NO

c. address BMPs for different pollutants?	☑ YES ☐ NO
d. provide incentives *(credits)* for innovative practices (*like reduced impervious surfaces, buffers)?*	☑ YES ☐ NO
e. allow exemptions?	☑ YES ☐ NO
5. Is the review based on the permittee's Storm Water Design Standards or other standards? If other, specify.	☑ YES ☐ NO
Response Review of LID practices is based on the SARA LID manual.	
6. Does the permittee's ordinance require compliance with the Storm Water Design Standards? The state permit requires permittees follow BMP requirements set forth in the general permit. The ordinance requires that the operator meet state requirements.	☑ YES ☐ NO
7. Does the permittee document its plan reviews of SWPPPs and approvals? **SAWS** Construction Team conducts full SWPPP reviews during their first visit to the construction site once construction starts.	☑ YES ☐ NO
8. Are requirements for long-term operation and maintenance addressed during the plan review? Basin maintenance plan addressed in WPAP and Aquifer protection plans. Detention ponds within San Antonio require maintenance plans and certification by owners' engineers that ponds are constructed in accordance with design plans and calculations.	☑ YES ☐ NO
SECTION IV: INSPECTIONS	
1. How many fulltime inspectors or other personnel are assigned to inspect **Areas of New Development and Re-Development**?	
Response: SAWS :New development – 3 within the Aquifer Protection processes	
2. Describe the prioritization and scheduling of inspections for the **Areas of New Development and Re-Development** program.	
Response: SAWS conducts temporary BMP control inspections throughout the City of San Antonio and Permanent BMP Annual/Bi-annual WQ basin inspections – geology and environmental inspections before and after construction.	
3. Does the permittee use a checklist to conduct inspections? SAWS - has an SOP and flowchart for our process. Being either storm water construction or WQ Basin Inspections.	☑ YES ☐ NO
4. What do inspectors look for when conducting inspections of **Areas of New Development and Re-Development**? *(Check all that apply)* Inspectors look to see whether: SAWS conducts geologic inspections for environmental concerns and tracks buffering and additional requirements related to developments over the Edwards Aquifer.	
a. BMPs have been properly installed and maintained. SAWS Temporary BMP-inspections during construction and Permanent BMPs - SAWS Water Quality Basin inspections over the Edwards Aquifer.	☑ YES ☐ NO
b. final, approved plans for the project are implemented. SAWS comments on building permits and Plat approvals over the Edwards Aquifer.	☑ YES ☐ NO
d. structural and source control BMPs were installed. SAWS conducts Annual/Semi annual inspections after construction completion of WQ basins	☑ YES ☐ NO
e. SWPPP meets permit requirements and is current with conditions and activities	☑ YES ☐ NO

at the site. SAWS Construction inspections are conducted to verify operators compliance with SWPPP.	
SECTION V: ENFORCEMENT	
1. Does the permittee have an enforcement policy in place that clearly describes the action *(e.g., verbal and written warnings, fines, and "stop work" orders)* to be taken for common violations?	☑ YES ☐ NO
2. Is there an enforcement escalation procedure for violations?	☑ YES ☐ NO
3. Are inspectors authorized to administer enforcement actions for permit non-compliance onsite (cease and desist orders, fines)?	
4. Has the permittee issued any escalated enforcement actions? If yes, how many actions?	☑ YES ☐ NO
Response: In 2014 there were 128 sites that received a FCN and 6 Stop Work orders were issued.	
5. Are there limitations of enforcement authority *(e.g., limits on the dollar amount of fines, inability to issue civil penalties)*?	☑ YES ☐ NO
6. Do inspectors conduct follow-up inspections or phone calls following the issuance of an enforcement action, to determine compliance? **Follow up inspections**	☑ YES ☐ NO
SECTION VI: RECORDS MANAGEMENT	
1. Does the permittee have a database in place to track activities of the **Areas of New Development and Significant Re-Development** program?	☑ YES ☐ NO
2. What information is tracked *(e.g., inspections, BMP types and locations, maintenance schedules, development sites, follow up inspections, enforcement actions)* in the database for the **Areas of New Development and Significant Re-Development** program?	
Response: Inspections for drainage tie-ins to public systems including discharge points into earthen channels and floodplains (i.e., headwalls, dissipaters, rock gabions, rip rap, etc).	
3. Who has access to the database?	
Response: TCI and Development Services staff have working access, and the permit applications can view the status of permits and inspections.	
4. Who is responsible for updating the database?	
Response: TCI, Development Services, and other City staff.	
5. Does the permittee update its SWMP to reflect current change and progress made with the **Areas of New Development and Significant Re-Development** program? As needed, the City provides information bulletins (IBs), Rule Interpretation Decisions (RIDs), and code amendments that may affect design and review of new development and redevelopment.	☑ YES ☐ NO
SECTION VII: ASSESSMENT	
1. Does the permittee assess the effectiveness of the **Areas of New Development and Significant Re-Development** program?	☑ YES ☐ NO
2. Based on the results of the effectiveness assessment, describe the positive results of the **Areas of New Development and Significant Re-Development** program.	
Response: SAWS inspection of permanent BMPs over the Recharge Zone to reduce TSS loading during storm events. COSA TCI- Management of runoff quantity and velocity to reduce soil erosion and therefore TSS	

erosion during storm events.	
3. Based on the results of the effectiveness assessment, what changes are proposed to enhance the **Areas of New Development and Significant Re-Development** program?	
Response: TCI- Construction of capital projects to address and repair problem areas. Continue reviewing plat and permit submittals for compliance with City codes.	
4. Does the permittee have adequate staff and equipment to implement the **Areas of New Development and Significant Re-Development** program? SAWS and TCI have adequate personnel to complete their responsibilities.	☑ YES ☐ NO
5. Does the permittee assess the **Areas of New Development and Significant Re-Development** program to determine if it meets Measurable Goals and other indicators?	☑ YES ☐ NO
6. Does the permittee assess the **Areas of New Development and Significant Re-Development** program's compliance with the permit requirements?	☑ YES ☐ NO
7. Does the permittee generate an assessment report of the **Areas of New Development and Significant Re-Development** program for its records? Annual reports are generated as well as an internal Review of WPAP and Aq.PP related to Storm Water Construction	☑ YES ☐ NO
8. What departments are involved in the **Areas of New Development and Significant Re-Development** program assessment?	
Response: SAWS RPC – Aquifer Protection and Construction. COSA TCI- Plat, permit, and capital improvement project (CIP) review.	

Completed by (Print Name): Arthur Reinhardt		
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