



January 25<sup>th</sup>, 2024

**Department of Environmental Quality**

**Attn:** Priscilla Woolverton, *Upper Willamette TMDL Basin Coordinator*

165 E. 7th Ave., Ste. 100

Eugene, OR 97401-3049

541.687.7347

**RE:** 2023 TMDL Annual Report

Dear Ms. Woolverton,

Enclosed you will find the Brownsville's Implementation Tracking Matrix updated with accomplishments from 2023 as part of the City's Annual Reporting requirement. Below is the list of items that were agreed upon between the City and DEQ in the 2019 plan update:

**Newsletter Articles**

- Pet Waste Stations
- General Overview
- Illegal Dumping Number & Website

**Track Permits**

- River's Edge Subdivision, Phase II & III | Ongoing Reviews
  - a. 1200 C
- Required Storm Engineering

**Public Works**

- Ditch Maintenance

- Stock Pet Waste Stations
- Wastewater Treatment Logs
- Riparian Vegetation Maintenance
- NPDES Discharge Requirements
- Tree Health & Tree City Designation
- Illegal & Dumping Complaints
- Catch Basin Markings
- Sweeping Contract - Monthly
- Annual Park Clean-up – January

**Council Engagement**

- January, April & November

The City has also spent considerable time and resources continuing to report on TMDL activities and to meet the new Designated Management Agency (DMA) requirements.

Sincerely,

City Administrator S. Scott McDowell

Public Works Superintendent Karl Frink

c: Mayor & Council  
File

# Implementation Tracking Matrix

POLLUTANT	SOURCE	STRATEGY (What we are doing and will do to reduce pollution from this source)	ACTIONS (Specific ways to implement strategies)	MEASURE (How we will track successful implementation or completion)	TIMELINE	STATUS UPDATE
Bacteria	1. Pet & animal waste	Inform residents about potential bacterial water contamination from animal waste.	<b>Short term:</b> Provide information in City Newsletter and provide dog waste bags in City parks.	Newsletter distributed. Resident feedback.	Annual	<b>September 2023 Council Synopsis Link:</b>  <a href="#">council_synopsis_09.26.2023final.pdf (brownsville.or.us)</a>
		Maintain pet waste stations and signs in public parks	<b>Long term:</b> Ongoing education to reinforce message.	Pet waste stations are kept stocked with bags	Ongoing; Annual review	Public Works continues to maintain pet waste stations in Pioneer Park and downtown. The cost to maintain the stations is about \$850; Bags are biodegradable.  Pet Waste Stations promote themselves due to their conspicuous locations. Park Caretakers and Public Works Staff also remind folks to use the bags to properly dispose of their pet waste.
	2. Stormwater BMP's	Require stormwater best management practices for water quality for new development and re-development.	Continue to enforce Public Works Standards and Municipal Code <a href="#">requirements</a>	Track and document that best management practices are implemented on all city permitted sites	Ongoing; Annual review	River's Edge Subdivision, Phase III  Developer continues to meet the requirements of Linn County. Developer has met the requirements for the City of Brownsville. Phase III is under construction.
		Require extensive review by City Staff including the City Engineer, Planning and Public Works.	City Engineer and staff meet and review applications prior to permitting			
	3. Inflow & Infiltration	Keep infiltration and inflow of the City's sewer system to a minimum. <i>(This issue is related to mainly stormwater.)</i>	Public Works performs annual ditch maintenance.	Update maintenance inventory on annual basis; track maintenance completed and cost	Ongoing; Annual review	Public Works performed annual maintenance to the ditch system and cleaned several sewers. Catch Basin and Curb inlet cleaning throughout town.
	4. Erosion & Sedimentation	Current development code requires developers to adhere to ODEQ NPDES Permit requirements for erosion control for areas >1 acre.	Continue to enforce Public Works Standards and Municipal Code <a href="#">requirements</a>  City Engineer and staff meet and review applications prior to permitting	Verification of 1200C coverage for all developments greater than 1 acre; track developments greater than one acre	Ongoing; Annual review	Same as Bacteria Section #2
		Provide information to builders about DEQs 1200C Permit requirements.	Revise building permit review process to include providing builder with a copy of the 1200C plan.  Include fact sheet from DEQ with all building permits.	Staff reports and tracks that BMPs required by a 1200C permit are included in permit packets for all developments	Ongoing; Annual review	The City requires proper stormwater management on small buildable lots as well. All developers are required to detain or retain water on property in most cases. The City has experienced a lot of development over the last five/six years.

	5. Wastewater Treatment Plant Discharge	Ensure effluent quality meets the requirements contained in the NPDES Permit.	Monitor and report effluent and river as required by the DEQ NPDES permit	Staff reports daily	Ongoing; Annual review	Staff spends considerable time working on reporting. City is working on engineering review of treatment processes.
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Mercury	1. Erosion and sedimentation	Erosion control on new development > 1 acre	See Bacteria 4 above	See Bacteria 4 above	Ongoing; Annual review	River's Edge Subdivision, Phase III
		Assist developers of individuals lots in larger developments to minimize erosion and runoff	See Bacteria 4 above	See Bacteria 4 above	Ongoing; Annual review	River's Edge Subdivision, Phase III
		Provide information to builders about the 1200-C Program.	See Bacteria 4	See Bacteria 4 above	Ongoing; Annual review	River's Edge Subdivision, Phase III
		Decrease soil disturbance in areas sensitive to erosion	Current development code requires engineering study with specific recommendations for erosion control on slopes > 10 percent	Track and document engineering studies completed	Ongoing; Annual review	River's Edge Subdivision, Phase III
	2. Stormwater BMP's	Inform residents of potential sources of mercury contamination to sewer systems	Identify existing educational materials and distribute to residents regarding mercury reduction	Track information distributed to residents via semi-annual newsletter and website.	Years 1-5: Update website with relevant information; include information in annual newsletter	<p><b>September 2023 Council Synopsis Link:</b></p> <p><a href="https://www.ci.brownsville.or.us/council_synopsis_09.26.2023final.pdf">council_synopsis_09.26.2023final.pdf (brownsville.or.us)</a></p> <p>★ TMDL is covered by the local newspaper, <i>The Times</i>, as part of Council coverage twice or more a year.</p>
Temperature	1. Riparian Vegetation	Protect existing riparian vegetation	City arborist inspects vegetation at least once annually; vegetation maintained as needed	Track inspections & routine maintenance of the park vegetation abutting the Calapooia River	Ongoing; Annual Review	Public Works reviewed Pioneer Park trees with tree expert Ernie Schuyler. Public Works did removed a few hazard trees from Pioneer Park this year. None in the riparian areas.
	2. Education	Inform residents of significance of riparian areas and measures they can take to improve water quality	Provide information to residents via City Newsletter, make material available on City website	Track information provided in newsletter annually; website maintained with updated and relevant information	Ongoing; Annual Review	<p><b>Please refer to the links above.</b></p> <p><b>City Web Page TMDL</b>  <a href="https://www.ci.brownsville.or.us/publicworks/page/total-maximum-daily-load-tmdl">https://www.ci.brownsville.or.us/publicworks/page/total-maximum-daily-load-tmdl</a></p> <p><b>TMDL discussed multiple times at Council meetings including the two dedicated times in April and November 2023.</b></p> <p><b>TMDL was an agenda item at Council meeting in January, April &amp; November. Click link for Council Agendas, Minutes, Packets &amp; Presentations:</b>  <a href="https://www.ci.brownsville.or.us/meetings">https://www.ci.brownsville.or.us/meetings</a></p>
	3. Wastewater Treatment Plant Monitoring	City discharges during cool temperature months of November - March only. Maintain low effluent temperatures	Meet requirements of NPDES permit. Staff measure the pH & temperature of the Calapooia	Discharge occurs under permit conditions only	Ongoing; Annual review	Public Works continues their operation of the plants within the required parameters of the NPDES.

			River and the City's effluent every day			
	4. Tree City	Maintain the requirements of the Tree City USA designation by properly caring for and planting trees throughout the community with special focus on riparian areas.	Monitor tree health during regular system maintenance and monthly meter reading	Continue to check tree health and plant necessary trees; track status of Tree City USA designation	Ongoing; Annual review	Certified again as a Tree City for the 20 <sup>th</sup> Year.

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Illicit Discharges	1. Illegal Dumping and Illicit Discharge, Detection and Elimination	Public education	<p>Inform public of rules regarding disposal by including articles in City newsletter, material on City website, literature available at City Hall lobby.</p> <p>Include dates for upcoming city, county and other locally sponsored household waste collection events on website and in newsletter.</p> <p>Clearly identify on City's website how community members should contact city with reports of illegal dumping and illicit discharges</p>	<p>Track articles included in newsletter, provide information on website</p> <p>Track information provided to public about illicit dumping/ discharge impacts on water quality and city's code enforcement</p>	<p>Years 1-5: Articles and collection events are published in newsletter at least annually; website information is kept up-to-date</p> <p>HHW Solid Waste Franchise SHS- places advertisement in the local newspaper annually</p> <p>Year 2: Clearly identify on city website a phone number that community members can call to report illegal dumping or illicit discharges</p>	See above.
		IDDE response, tracking and enforcement	Calls or complaints received by City Hall are reviewed in the field by Public Works Superintendent who takes any necessary remediation efforts from there with the City Administrator	Track complaints, city response and follow-up actions	Ongoing; Annual Review	The City received one call about IDDE in 2023. Handled by LCSO, LC Health Department & Public Works.

	Staff Training and Enforcement	Provide annual Staff training on how to detect, report and mitigate illegal dumping and illicit discharges	Track illegal dumping and illicit discharges reported and discovered, follow-up and enforcement actions	Years 1-5: Provide biennial staff training (every other year)	Public Works is aware of what illegal dumping is and monitor the City every day.
	Identify Stormwater catch basins and label to educate public	Label and stencil storm drain catch basins to identify them as Stormwater system and inform public that they drain to streams.	Continue labeling; track related expenses	Ongoing; Annual Review	Public Works is completing and refreshing labeling as time allows.

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All Pollutants	1. Public Works Operations	Street Sweeping  Pioneer Park Leaf Collection	Continue contract for sweeping services  Continue Annual Park Clean-Up	Ensure monthly sweeping is carried out per contract  Annually clean-up Park	Monthly  Annually	The City has an IGA contract with the City of Lebanon for street sweeping which occurs monthly.  Public Works completed the Annual Leaf Collection work in Pioneer Park in November & December 2023.
	2. Council Support	Keep Council abreast of the program and implications.  Regularly review the Drainage Master Plan, the Water Master Plan, Park Master Plan, and the condition of the Calapooia River.	TMDL WILL BE AGENDA ITEMS TWICE A YEAR.  Monthly meetings focusing on the City Treasury	Monitor progress through reporting as items are completed. Council has a goals board which is updated every TWO YEARS as to progress made.	February 2019 through February 2024	See above list and documentation.

	3. Staff	Council requires Staff to continue work on TMDL and related topics	Update plans as needed, forward necessary regulations as planned, continue implementation of applicable policies and strategies adopted by Council.	Reports from Staff monthly and through the year.	Ongoing; Annual Review	Karl Frink and Scott McDowell reviewed several programs and notifications offered by DEQ in 2023. Both read many periodicals that contain reports on TMDL activities throughout the United States.
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