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Private Stormwater Management - At year two, slow progress on data management, but program evaluations are underway

News Article



This is a two-year follow-up to our 2018 report, "Private Stormwater Management: City reliance on property owners requires review of risks and results."

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Our 2018 audit of Bureau of Environmental Services' approach to managing stormwater on private property found shortcomings with data collection and management, inspections, and program evaluation. We recommended that the Bureau make data available for system planning by streamlining information systems and increasing monitoring. We also recommended that the Bureau regularly assess its approaches to encouraging private stormwater management.

At year two, the Bureau continued to make slow progress on data systems and inspecting stormwater structures at single family residential properties. It was in the process of evaluating Clean River Rewards through a Comprehensive Rate Study and evaluating and making changes to the

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permitting program based on risk assessments in a new stormwater and sewer system plan.

Recommendation Status: Slow Progress

2018 Recommendation

Develop a single information system to inventory private stormwater structures.

2020 Auditor's Status Update: Slow progress

The Bureau created a list of about 140 types of data used across the Bureau and eventually will assign stewards for each type of data. The Bureau was also in the process of adding data on permitted structures to the same asset management database it used to track maintenance for public stormwater structures. The Bureau did not provide an update about tracking assets across the three systems identified in the initial audit: permitting, maintenance, and Clean River Rewards.

Recommendation Status: Slow Progress

2018 Recommendation

Develop additional risk-based monitoring programs for single-family residential permit structures and all Clean River Rewards structures like the existing program used to monitor non-single-family residential permit structures.

2020 Auditor's Status Update: Slow progress

The Bureau continued the practice of not inspecting residential properties and instead sent educational mailers. However, staff said that it was continuing work on a stormwater and sewer system plan, which will identify and prioritize business process improvements based on risk assessments for the entire collection system. The next phase of the plan will include an analysis of whether the Bureau should begin monitoring single family residential permits.

Recommendation Status: In Process

2018 Recommendation

Create a schedule and assign staff to periodically evaluate outcomes of the permitting and Clean River Rewards program against stated goals.

2020 Auditor's Status Update: In process

The Bureau identified three goals for the program: increase the equity and fairness of stormwater management charges; advance City environmental policies and commitments; and protect and enhance the long-term financial stability of the stormwater utility. The Bureau is evaluating progress towards these goals through its Comprehensive Rate Study, which has been delayed due to COVID-19 but is expected to be available in 2021. The Bureau is also tracking the percentage of participants in the utility financial assistance program who are also enrolled in Clean River Rewards. The Bureau will not evaluate Clean River Rewards impact on diverted stormwater. Management said that gathering meaningful data and investing in staff to evaluate outcomes or actual stormwater removed due to the program is a high-effort, high-cost activity.

Recommendation Status: In Process

2018 Recommendation

Use the results of evaluations to ensure the achievement of the permitting program goals and expectations.

2020 Auditor's Status Update: In process

The status of this recommendation depends on the completion of the rate study, which is still in process. Because the Bureau is not meeting its goal for percent of participants in the utility financial assistance program also participating in Clean River Rewards, it increased targeted outreach about Clean River Rewards, including a direct mail campaign and translated registration materials.

Recommendation Status: In Process

2018 Recommendation

Create a schedule and assign staff to periodically evaluate outcomes of the permitting program against stated goals.

2020 Auditor's Status Update: In process

The Bureau said that it would continue to evaluate business processes, such as requirements in the Stormwater Management Manual, as part of the continuing work on a stormwater and sewer system plan mentioned above.

Recommendation Status: In Process

2018 Recommendation

Use the results of evaluations to ensure the achievement of the permitting program goals and expectations.

2020 Auditor's Status Update: In process

The Bureau planned to propose an increase in the threshold for the square footage of impervious surface that will trigger the need for a stormwater permit from 500 square feet to 1,000. The Bureau said it plans to request the increase in its comments on the next permit application with the Oregon Department of Environmental Quality. If the state approves the change, the Bureau can consider it in the next version of the Stormwater Management Manual.

View the [original 2018 audit report](#) and our [1-year follow-up report](#).

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