

**Bureau of Environmental Services  
slow to act on private stormwater  
recommendations**



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 one**, the Bureau has been slow to implement recommendations to evaluate programs related to stormwater management on private property and implement program improvements. The Bureau began to review its need for improved data storage and monitoring but had not yet focused on stormwater structures. Management incorporated recommendations into broader long-term Bureau-wide initiatives, but it is not yet clear whether recommended actions to improve stormwater management will be taken.

**We will follow up again** in one year to check that the remaining recommendations are fully implemented.

**Slow  
Progress**

<b>2018 Recommendations</b>	<b>2019 Auditor's Status Update</b>
<p>Develop a single information system to inventory private stormwater structures.</p> <p><i>Why:</i> Incoherent information systems created a risk of over spending.</p>	<p>The Bureau was reviewing all of its data needs, not only needs related to private stormwater structures, and developing a Data Management Strategy.</p> <p>The Bureau said it would begin a process to purchase a new enterprise asset management system that would include information on private stormwater structures.</p>
<p>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.</p> <p><i>Why:</i> Structures subject to inspection were in better condition than those not inspected.</p>	<p>As part of its effort to update the combined stormwater system plan, the Bureau was creating a register to catalog all of its ideas, requests, and recommendations (including this one) before determining which items to prioritize.</p> <p>The Bureau anticipated completing the register and first set of analyses in 2020.</p>

  
**Slow  
 Progress**

<b>2018 Recommendations</b>	<b>2019 Auditor's Status Update</b>
<p>Create a schedule and assign staff to periodically evaluate outcomes of the Clean River Rewards programs against stated goals.</p> <p><i>Why:</i> 86% of properties with permitted structures were not participating in Clean River Rewards.</p>	<p>The Bureau included a review of the Clean River Rewards program in the scope of work for its contracted comprehensive rate review study. Preliminary results and potential recommendations were expected in the summer of 2020.</p>
<p>Use the results of evaluations to ensure the achievement of Clean River Rewards goals and expectations.</p>	<p>Same as above. The Bureau anticipated completing preliminary results of the evaluation in the summer of 2020.</p>
<p>Create a schedule and assign staff to periodically evaluate outcomes of the permitting programs against stated goals.</p> <p><i>Why:</i> Staff was unable to quantify the overall effect of the permitting program and could not compare benefits to the cost of implementation.</p>	<p>The Bureau was evaluating business processes as a part of the combined system planning efforts. That planning effort will result in updated goals for the combined sewer system which would then inform evaluation of the permitting program. Staff said that potential business process changes would be added to the register for consideration and potential implementation after 2020.</p>
<p>Use the results of evaluations to ensure the achievement of permitting program goals and expectations.</p>	<p>The Bureau provided auditors with a summary of anticipated changes to the 2016 permitting program and planned to update program requirements in January 2020. Proposed changes were not evaluated against program goals and instead were designed to improve clarity, continue regulatory compliance, and increase technical rigor. In future years this will be informed by the updated combined system plan goals.</p>

Contact: Elizabeth Pape, [elizabeth.pape@portlandoregon.gov](mailto:elizabeth.pape@portlandoregon.gov)  
 Kari Guy, [kari.guy@portlandoregon.gov](mailto:kari.guy@portlandoregon.gov)