

# PORTLAND UTILITY BOARD

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To: Dawn Uchiyama, Director, Bureau of Environmental Services  
Kaitlin Lovell, Regulatory Strategy & Remediation, BES  
Barbara Adkins, Stormwater Compliance, BES  
\*comment also submitted to BES via online public portal

Cc: Commissioner Mingus Mapps  
Michelle Rodriguez

Re: PUB feedback on Stormwater Management Plan (SWMP) Changes

Date: September 29, 2022

The Portland Utility Board (PUB) serves as a community advisory board for the Bureau of Environmental Services (BES) and the Portland Water Bureau (PWB). At our September 15, 2022 meeting, the Board discussed the proposed changes to the NPDES MS4 required Stormwater Management Plan and adopted the following recommendations for your consideration:

1. Develop a succinct description of the goals for the SWMP to define specific outcomes and measurable deliverables more clearly. For example, for stormwater it could include "10,000 rain gardens in the next 10 years" or "every block gets a rain garden". Deliverables should focus on "on the ground" outcomes that demonstrate a direct impact on stormwater.
2. Prepare plans, e.g. drawings, that show where green stormwater management facilities and structural alternations could be done to reduce pollutants, a reasonable timeline for implementation, and estimated costs, impacts and benefits to neighborhoods, and the climate with carbon foot-printing.
3. Reduce the use of chemicals by continuing investigation of new practices and altering approaches to eliminate chemicals, such as areas where plants could be cut manually or simply allowed to grow.
4. Enhance public outreach approaches to maximize the effectiveness of reaching the general public, including consideration of partnerships, activities or events that may reach a broader community to address lack of awareness by the general public.

5. Continue investigating deicing in the least harmful ways to waterways and people. It is also important to go beyond publishing of best practices. Develop and include specific performance measures to address cross bureau communication and staff training, ensuring best practice implementation (e.g. in Parks, PBOT, BDS programs).
6. Either modify reporting to limit to the MS4 area only or better explain why the bureau is reporting to the public and DEQ information that is not specific to the MS4 geographic area.
7. Do not change the new/re-development threshold for stormwater from 500 square feet to 1000 square feet in the future. The PUB recognizes this is not currently included but pre-emptively wishes to discourage a potential future change.
8. Eliminate grey facilities as options for new and re-development projects. When a developer indicates they cannot do stormwater management unless they use grey, require they use ecoroofs pertaining to a building. On new development, a developer should need to prove that grey infrastructure is the only way to manage stormwater in order to push for a higher bar they have to meet before reverting to more engineering and less natural way to manage stormwater. Note the PUB considers drywells and sumps as grey infrastructure.
9. Clarify the cost burdens and benefits of the MS4 requirements.
10. Treat all drainage areas, MS4, CSO, UIC, etc. with same attention to social, environmental and climate equity for green infrastructure. In new and redevelopment, require rain gardens, green streets, etc. in the UIC area. Only allow sumps and dry wells as back-up for green facilities.
11. Integrate the Watershed Management Plan into the SWMP. Prior versions of the SWMP made extensive reference to the Watershed Management Plan but the current version does not mention it at all. As a core document for the City, it should be referenced in all relevant plan documents.
12. Place a greater emphasis on green infrastructure strategies such as green streets, bioswales, urban tree canopy, and land acquisition. The current version of the SWMP appears to deemphasize these strategies relative to prior versions.

The PUB wishes to acknowledge that the City and BES are working hard to reduce pollutants discharging into our rivers, streams, slough, and lakes. The Board appreciates the opportunity to provide feedback on the current proposal and looks forward to future opportunities to engage with BES on the SWMP and related issues.