



City Auditor Executive Summary Stormwater Discharges Associated with Construction

Why We Are Doing This Audit

On July 29, 2022, the Mayor and City Council did approve the City Auditor's Audit Plan for the 2023 fiscal year. This Audit Plan requires the review of existing Policies, Procedures, Practices, and Controls for governing the City's Stormwater Discharges associated with Construction Activity. The performance of this audit keeps the City up to date with the ever-changing compliance requirements for more environmental audits. This audit assures the citizens of Galveston that the City is performing its due diligence for environmentally friendly construction projects.

Evaluating Existing Policies, Procedures, Practices, and Controls

The City Auditor's Office is observing a "written".

- PowerPoint Training Guide for employees of the Streets, Traffic, and Drainage Divisions.
- License Tracking Tool for each employee. This includes attending training classes required by Texas Commission on Environmental Quality (TCEQ) standards.
- Decision Tree Flowchart alongside enforcement procedures to follow for the Galveston Utility System and Galveston Pretreatment Departments. This flowchart includes code violation sections and explanations of the code.
- Notice of Violation (NOV) Templates for employees to use as notification for violations in the city's bounds.
- Stormwater Master Plan (SWMP) available to the general public on The City of Galveston's Official Website.
- Historical Information Synopsis for employee reference.

Relevant Background

An inherent problem with construction is that it causes soil to become vulnerable and erode. Eroded soil will endanger water resources by decreasing quality and causing silting of aquatic habitats.



City Auditor Executive Summary Stormwater Discharges Associated with Construction

For fish and other species. Eroded soil also necessitates the repair of sewers, ditches, and the dredging of waterways. The task of the City of Galveston is to promote public welfare by regulating the construction of any development that disturbs the soil or results in movement of earth or land. The Director of Public Works and Municipal Utilities is developing, implementing, and enforcing a program that reduces discharges of stormwater pollutants and protects water quality to the maximum extent practicable by the adoption of the following six (6) minimum control measures:

1. A public education and outreach program;
2. A public involvement and participation program;
3. An illicit discharge detection and elimination program;
4. Regulation and control of public and private construction site stormwater runoff quality;
5. Regulation and control of public and private post-construction stormwater runoff quality;
6. Pollution prevention and good housekeeping for municipal operations.

What We Are Observing

The Public Works and Utilities Director is creating training programs for all employees under his supervision. The City Auditor's Office applauds this initiative wholeheartedly as it is necessary for City's environmental concerns. The City Auditor's Office notes that certain policies and procedures are in writing. However, it will take longer to inscribe the entire list of policies, procedures, best practices, and controls as an ongoing record. The department could benefit in a timely manner by electing the City Auditor's Financial and Compliance Policy Guidelines (F&CPG) project. This proposed future F&CPG project would only entail the City Auditor's Office to collect all available material for training purposes as indicated by the Director for the six (6) minimum control measures stated above. This project would not use the City Auditor's Office to determine the procedures and best practices that would be practicable for the City of Galveston. This election would help to facilitate well-timed implementation of all policies, procedures, best practices, and controls dealing with stormwater discharges.



City of Galveston

City Auditor's Office
Audit ENV2023-1
2/15/2023

City Auditor Executive Summary Stormwater Discharges Associated with Construction

City Manager's Office Comment

The Manager has reviewed the Auditor's report and supports its conclusions. What the Manager is requesting is that the Public Works and Utility Director provide the Auditor and this office with a timeline for the completion of the outstanding policies and procedures. That timeline will then establish a benchmark that can be monitored to assess progress toward a comprehensive set of policies and procedures.

City Auditor's Office Comment

The City Auditor's Office will include the completion of the outstanding policies and procedures in the 2024 Audit Plan.

Prepared by: Cabrie Small Date: 4/4/2023

The City Auditor's Verification of Auditor Assignments

I have assigned the above staff to the stated engagement. I have determined that they collectively possess the competence, knowledge, and skills necessary to perform the assigned work, and individuals have the skills necessary to perform their assigned roles in accordance with Generally Accepted Government Auditing Standards (Standards 4.02 & 4.03).

Approved By: Glen Bulgini Date: 4/4/2023