iSWM Plan Review Process

Presented by:
Ty Thompson, P.E. & Stephen Nichols, P.E.
Transportation & Public Works Department,
Stormwater Management & Development Services Division
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HEAVILY REGULATED (LESS RISK)

STIFLED GROWTH
LIGHTLY REGULATED (MORE RISK)

UNIMPEDED GROWTH
• Mayor’s comments
• Self-evaluation and diagnosis
• Target established – reduce the time and expense associated with SWM permitting
Reduce Number of Review Iterations

• How? What can we do?
• Simplify
• Collaborate
• Communicate
• Coordinate
• Incorporate feedback
Simplify

• Revise manual
• Consolidate paperwork
• Reduced level of detail at preliminary phase
Collaborate on Submissions
Enhance Communication

- Stormwater Pre-development Conference (SW PDC)
- Define review point of contact
- Internal coordination
- Intermediate contact with customers
- Newsletter
- Surveys and follow up
- Resources
Is that enough?

What else can be done to improve?

Where are the biggest gains to realized?
What causes review iterations?
iSWM Review Comment Assessment

• Purpose
  • Evaluated reviews to identify source or reason for review iterations and identify opportunity for program refinement
  • Reduce time and effort for development community (and city)
• Assessment performed by two firms – JGR & Pacheco Koch
• Sample of 20 project reviews with 3 or more iterations
• Mix of preliminary and final iSWM plans, construction plans
• 14 categories of comments
14 Firms Represented in Sample of 20 Projects

- Frequent customers – 9
- Occasional customers – 3
- One time customers – 2
Summary of Findings

Total of project samples affected by:

- Previous comments were not being addressed (100%)
- Submittals were missing data that was required in order to perform a review (94%)
- Submittals did not follow CFW criteria or show sufficient information to demonstrate compliance (59%)
- Design error/error on plans (59%)
Final Assessment of 455 Review Comments

Percent of Review Comments

- 0.2%
- 6.2%
- 12.3%
- 24.4%
- 48.4%
- 10.3%
- 17.6%
- 8.6%
- 10.8%
- 4.0%
- 0.7%
- 6.6%
- 3.3%
- 2.0%
- 3.3%
- 1.1%

Comment Classification
Final Assessment of 455 Review Comments

<table>
<thead>
<tr>
<th>Comment Classification</th>
<th>Percent of Review Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>INFO REG BEYOND STANDARDS</td>
<td>0.2%</td>
</tr>
<tr>
<td>REVIEWER PREFERENCE</td>
<td>6.2%</td>
</tr>
<tr>
<td>REVIEW COMMENT PROVIDED AFTER 1ST ITERATION</td>
<td>12.3%</td>
</tr>
<tr>
<td>LACK OF COORDINATION W/T SAS AND FLOOD</td>
<td>2.4%</td>
</tr>
<tr>
<td>INSUFFICIENT SUPPORTING DOCUMENTATION FOR REVIEW</td>
<td>2.2%</td>
</tr>
<tr>
<td>NOT COMPLY W/ CFM STANDARDS</td>
<td>24.4%</td>
</tr>
<tr>
<td>DESIGN ERROR</td>
<td>48.4%</td>
</tr>
<tr>
<td>ERROR ON PLAN</td>
<td>10.3%</td>
</tr>
<tr>
<td>COMMENTS NOT ADDRESSED</td>
<td>17.6%</td>
</tr>
<tr>
<td>SWFM REQUESTED</td>
<td>8.6%</td>
</tr>
<tr>
<td>SWFM FINAL COMMENT</td>
<td>10.8%</td>
</tr>
<tr>
<td>OTHER PLAN/DESIGN REVISED</td>
<td>4.0%</td>
</tr>
<tr>
<td>OTHER COMMENT DEFERRED TO SWFM</td>
<td>0.7%</td>
</tr>
<tr>
<td>OTHER COMMENT VIRTUAL/ETF W/ VAKER REQ</td>
<td>6.6%</td>
</tr>
<tr>
<td>OTHER COMMENT PROVIDE FOR SWFM INFO SUBMITTED</td>
<td>3.3%</td>
</tr>
<tr>
<td>OTHER PLAN NEEDS TO BE APPROVED</td>
<td>2.0%</td>
</tr>
<tr>
<td>OTHER 1207 PERM REQ REQUIRED FINAL COMMENT</td>
<td>3.3%</td>
</tr>
<tr>
<td>OTHER</td>
<td>1.1%</td>
</tr>
</tbody>
</table>
Summary of Findings (cont.)

• Does not comply with CFW standards (48.4%)
• Insufficient supporting documentation for review (24.4%)
• Design error - conflicting information (17.6%)
• Review comment provided after 1st iteration (12.3%)
• Comments not addressed (10.8%)
• H&H methodology does not meet criteria (10.3%)
• Reviewer Preference (6.2%)
Summary of Recommendations

• Applicants attend SDS predevelopment conference
• Completeness checks
• Applicants utilize most recent iSWM H&H methods and design criteria
• Applicants submit clear comment response letters
• Reviewers be consistent with their comments
• Reviewers reference source of criteria that comment was based on Do not tie permitting process for SWFMA, TxDOT ROW permits, Floodplain Development Permits to iSWM to avoid delay
Discussion Ideas

• How many iterations should a review have?
• Training opportunities?
• Has iSWM plan preparation become more complicated?
• Are iSWM plans beyond the average civil engineer?
• Future of the program?
• iSWM certification?
Thank you