

iSWM Plan Review Process

Presented by:

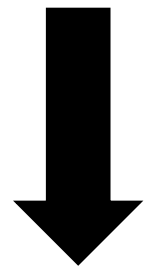
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Transportation & Public Works Department,

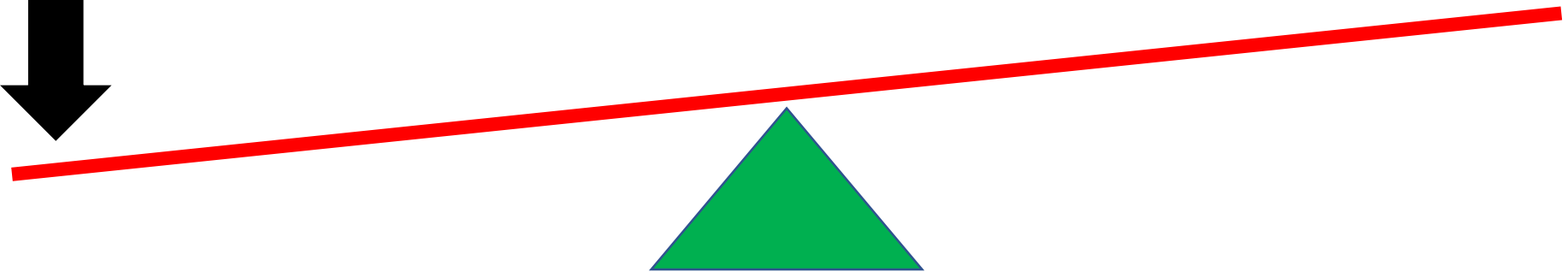
Stormwater Management & Development Services Division

July 11, 2018

HEAVILY
REGULATED
(LESS RISK)



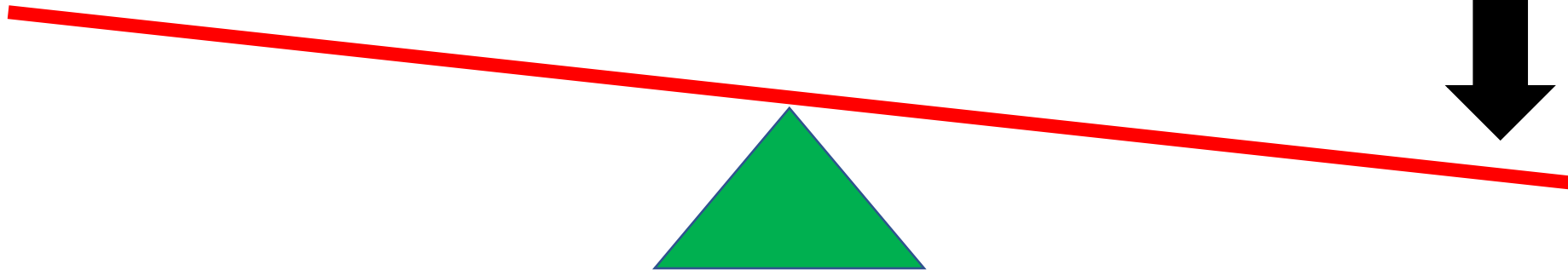
STIFLED
GROWTH



LIGHTLY
REGULATED
(MORE RISK)

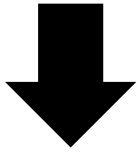


UNIMPEDED
GROWTH

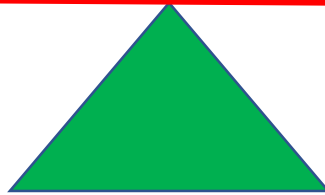
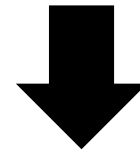




REGULATION



GROWTH /
RESOURCES





- Mayor's comments
- Self-evaluation and diagnosis
- Target established – reduce the time and expense associated with SWM permitting









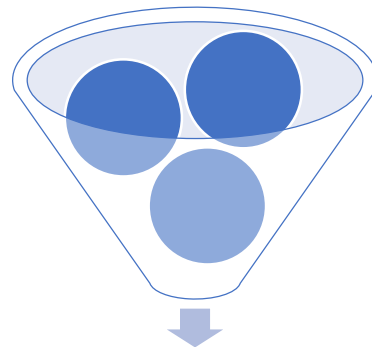
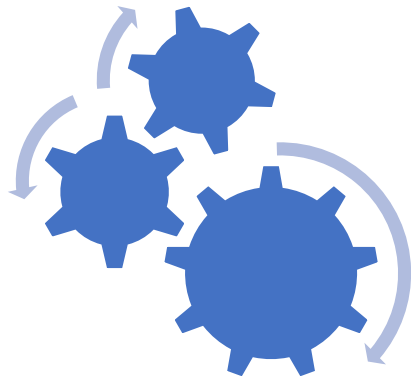
Reduce Number of Review Iterations

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

Simplify

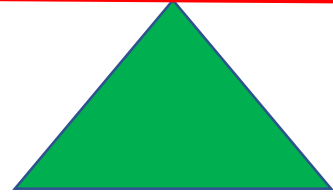
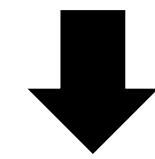
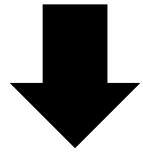
- Revise manual
- Consolidate paperwork
- Reduced level of detail at preliminary phase

Collaborate on Submissions



CONSISTENCY

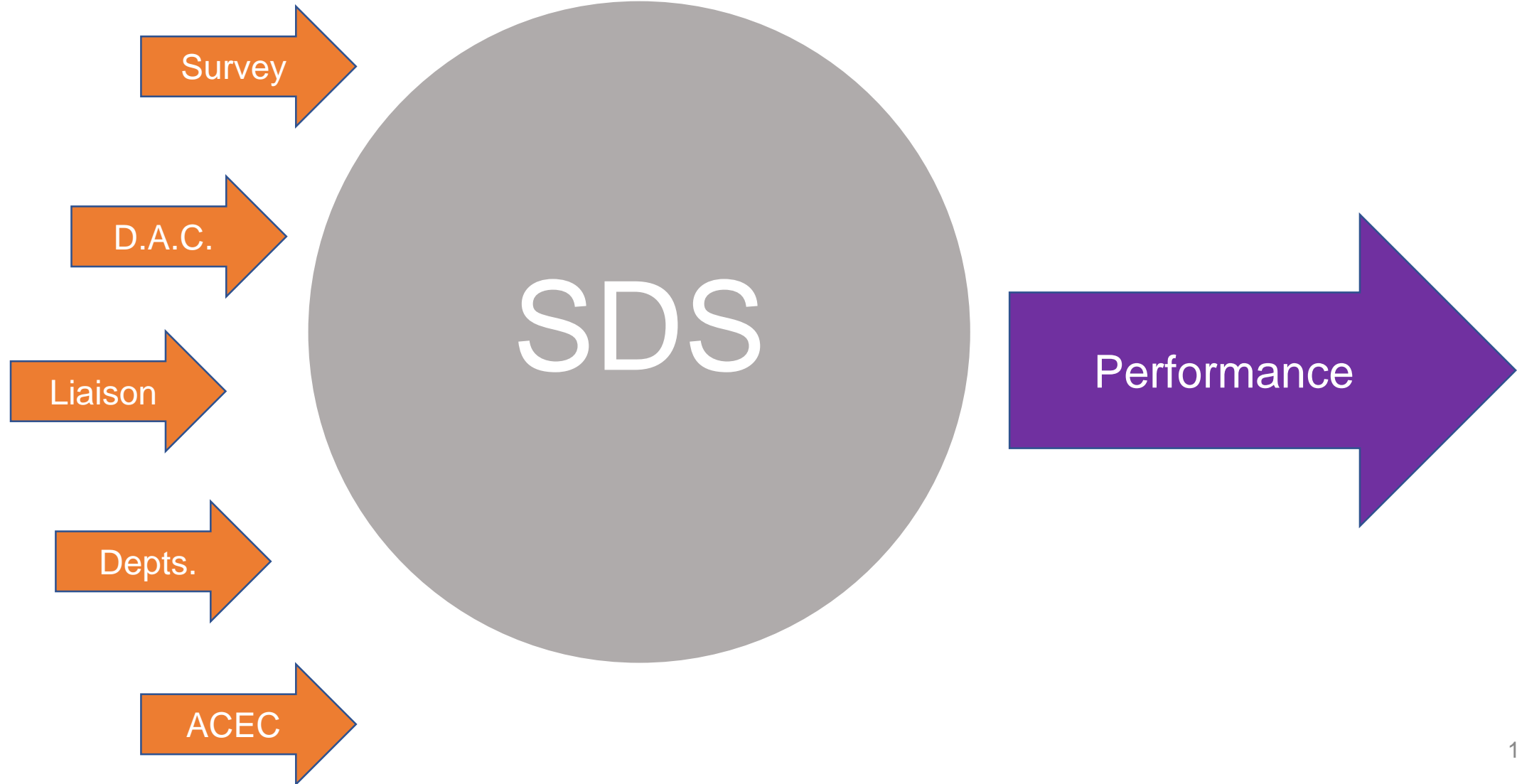
FLEXIBILITY



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

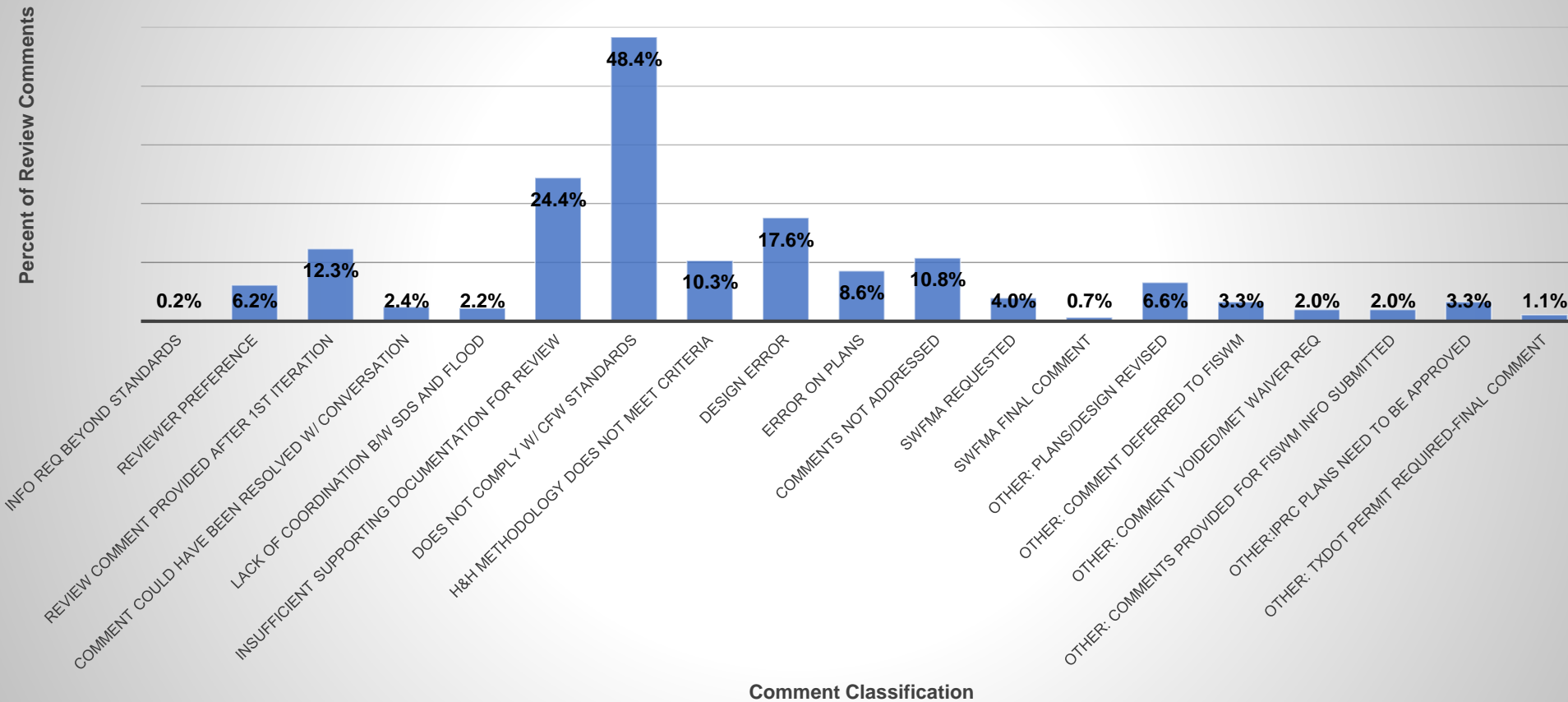
- Frequent customers – 9
- Occasional customers – 3
- One time customers – 2

Summary of Findings

Total of project samples affected by:

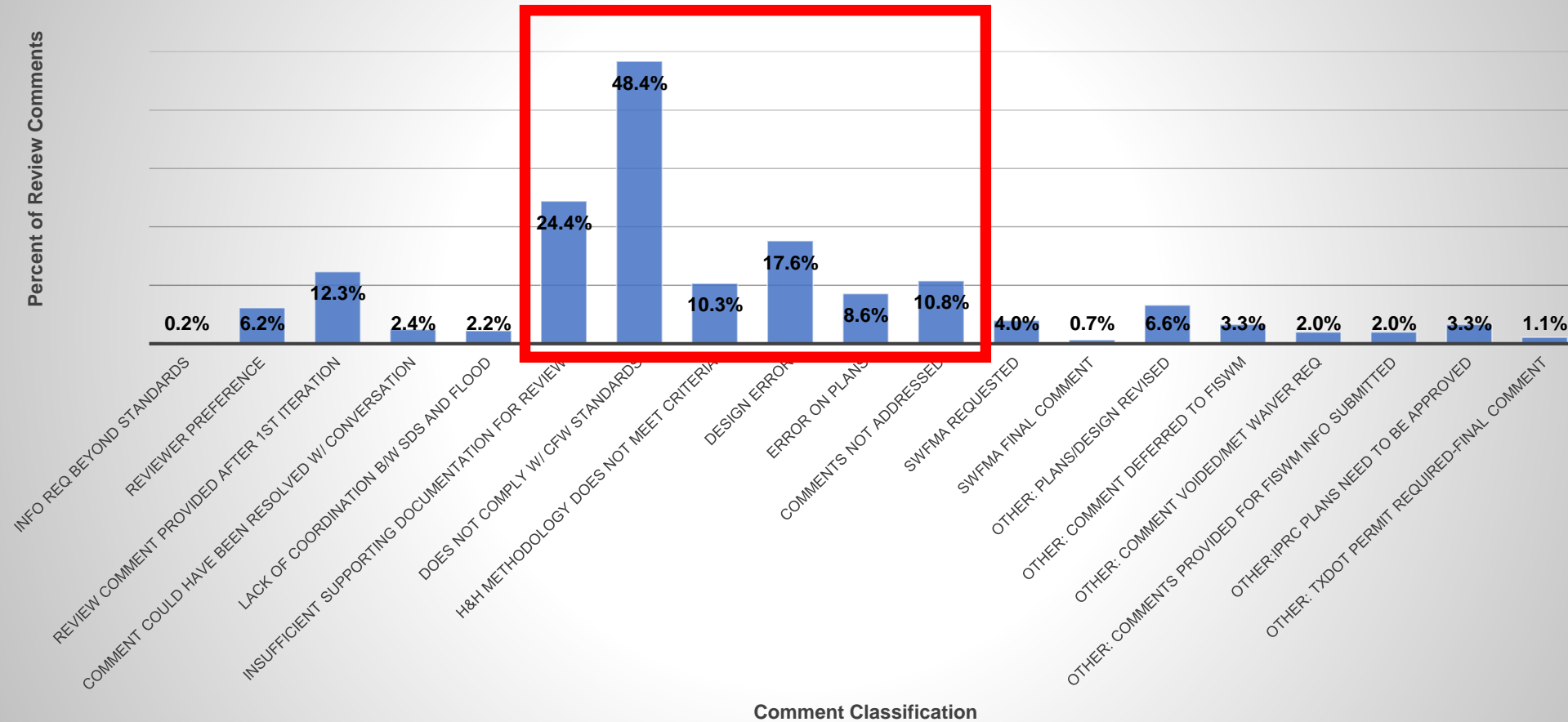
- Previous comments were not being addressed (100%)
- Submittals were missing data that was required in order to perform a review (94%)
- Submittals did not follow CFW criteria or show sufficient information to demonstrate compliance (59%)
- Design error/error on plans (59%)

Final Assessment of 455 Review Comments



Final Assessment of 455 Review Comments

Percent of Review Comments



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

