

ETDM Annual Report

Suwannee River Water Management District

July 2006

Introduction

The Suwannee River Water Management District's (District) participation in the Efficient Transportation Decision-Making (ETDM) process has enhanced the ability of District staff to fully identify the scope of major regional transportation projects, to identify and provide critical feedback on potential resource implications, and has afforded the District the opportunity to conduct inventories of District lands in order to identify regional mitigation opportunities for future FDOT projects. The process has also improved the ability of District staff to act on FDOT permit applications, complaints, permit compliance issues and assist on construction related issues in a more efficient manner. A major component of this increased efficiency is do to improved coordination between the agencies which has lead to resolving issues more efficiently and has promoted joint participation on various other regional projects.

District responsibilities with respect to major transportation projects include initial project review, advanced coordination in the planning and programming phases, advanced regional mitigation planning, Environmental Resource Permit and Water Use application processing, coordination on complaints and compliance issues, joint participation on regional projects, and quarterly coordination on past, present and future projects and issues.

It is expected that continued implementation of the ETDM process in a way that allows for early involvement and interagency review will improve the ability of District staff to implement these responsibilities.

The following responses are provided based on the MOU Performance Measures format provided by FDOT.

Section I – Before ETDM Implementation

1.1 Describe how the agency is organized in Florida.

The Suwannee River Water Management District was created pursuant to the Florida Water Resources Act of 1972, as amended in 1976. A Governing Board of nine members, appointed by the governor and confirmed by the state senate, sets policy and direction for the District. Board members serve four-year terms. The Governing Board employs an Executive Director who is charged with overseeing the activities of the District and its 68 employees. The District consists of five Departments: Executive, Resource Management, Land Acquisition and Management, Water Resources, and Administration. The District covers approximately 7,600 square miles and has the highest concentration of freshwater springs in the state.

The mission of the District is to protect and manage water resources, to support natural systems, and the needs of the public. The District is charged with water supply, flood protection, water quality, and natural

systems responsibilities under Chapter 373, Florida Statutes. The District achieves this mission through the implementation of several programs. These programs include: water supply planning and management, quality communities, resource monitoring, land acquisition, land stewardship, watershed management, restoration, and regulations.

1.2 Describe how project information enters the organization.

Information concerning proposed and planned FDOT transportation projects was provided to the District most frequently through these mechanisms:

- ❖ Inclusion on the FDOT project inventory pursuant to Section 373.4137, F.S.
- ❖ Circulation through the Florida State Clearinghouse process.
- ❖ Review of a local government proposed comprehensive plan amendment, development of regional impact (DRI), or other local government documentation.
- ❖ Receipt of an Advance Notification from FDOT or FDOT consultant.
- ❖ Pre-application meeting with regulatory staff.
- ❖ Newspaper and mailed meeting notices.
- ❖ Permit Applications.

1.3 How many staff were involved and how were they allocated?

No staff were specifically assigned or budgeted to review FDOT projects unless wetland impacts and mitigation was involved. FDOT projects were basically reviewed by a specific staff member assigned by county unless it was a water use and/or water well issue. Water and well issues were handled on an ad hoc basis. If wetland impacts were anticipated the project would be reviewed by an environmental specialist in coordination with a specific staff member responsible for that county. Prior to ETDM, the FDOT mitigation program under 373.4137 F.S., was generally handled by one staff member responsible to implement the mitigation program for the District. The FDOT financially reimburses the District for providing mitigation under this program.

1.4 How were projects assigned?

Projects were assigned to specific staff members based on the county the project was located in unless wetland issues or mitigation was involved. The Director of Resource Management assigns staff members to be responsible for projects by county. The one exception is if wetlands are involved, then an environmental specialist would be involved in reviewing the project along with the staff member handling the FDOT mitigation program.

1.5 How frequently did staff consult or coordinate with FDOT on projects?

On complex projects a pre-application meeting may take place or an informal wetland jurisdictional review may be requested by the FDOT. When jurisdictional determinations were requested, a field meeting would occur with representatives from each office.

Under the 373.4137 process, District staff communicated with FDOT staff once the wetland impacts were listed on the environmental inventory, unless mitigation needs were required on a fast schedule project. On fast schedule projects, coordination usually occurred too late and mitigation needs were difficult for the District to provide within FDOT's production schedule.

For Clearinghouse projects, Corps public notice, and other review activities, District staff generally did not consult directly with FDOT staff, but responded with comments to the agency coordinating the review (e.g., FDEP, Corps of Engineers, and FDCA).

1.6 How many FDOT projects were reviewed and coordinated with FDOT each year?

From 1990-1999, the District reviewed approximately six applications per year for FDOT with two Advanced Notifications. Pre-applications meetings were conducted on one project per year. From 2000–2004, the District reviewed approximately 10 applications per year for FDOT with three Advanced Notifications. Pre-application meetings occurred approximately two times per year.

From 1996-2004, the District reviewed approximately one project per year associated with the Section 373.4137 mitigation process.

1.7 Describe your typical involvement with FDOT projects and at what phase that involvement usually occurred: planning, PD&E, permitting, etc....

District staff closely reviewed projects provided on the FDOT inventory through the Chapter 373.4137 process and developed and implemented mitigation plans accordingly through the permitting process. Rarely, did this occur during the planning or PD&E process. On fast schedule projects, permitting and mitigation occurred during design with limited time to find mitigation before FDOT's production dates.

Overall, there was minimal coordination during the planning and PD&E process.

1.8 How many staff hours per month were typically devoted to working on FDOT projects? Planning Phase? PD&E phase? Permitting?

Staff did not become involved in the planning and PD&E phases of FDOT projects. For the permitting phase, staff would spend the time needed to hold pre-application meetings, review applications, and conduct field reviews. In addition, staff would spend time each year to the 373.4137 mitigation planning process. As an estimate, staff would spend twenty to forty hours per month on FDOT projects.

1.9 What were the major barriers to coordination and involvement with FDOT projects: Budget? Staff? Other Resources? Time? Communication? Meetings? Field Reviews?

The Governing Board directs the programs and initiatives which are the priorities that are implemented as per the District's mission. These priorities, correlated with limited resources, budget, and staff, dictate the level of coordination and involvement efforts associated with FDOT projects.

There was no source of revenue to rely upon and budget staff resources to review FDOT projects. Staff priorities are generally directed towards water resources projects that are funded through the District's planning and budget process. There was no formal process or intergovernmental structure in place to allow for effective and required lines of communication between the District and the FDOT District offices. Notifications of FDOT projects required only a voluntary response at District's expense with no assurance of FDOT's accountability to the comments made.

Funding necessary to hire additional staff to provide more comprehensive services to FDOT had been the most significant barrier. In general, the District had been providing services with the same number of employees for several years. Providing services to the public with the same number of staff members as the customer base increased was difficult. Adding more communication and involvement with FDOT with the same resources, as the customer base increased, was not possible. The budget, staff resources, and staff time was not available to improve coordination with FDOT. In summary, FDOT received the same level of service as any other permit applicant.

1.10 Describe your involvement with the MPO's planning process.

There was minimal involvement with the MPO's planning process.

1.11 When did your agency typically provide review on DOT transportation projects?

District staff provided review of projects at or near the permitting phase through the Section 373.4137 mitigation process, and the Florida State Clearinghouse process.

Permit applications were reviewed in the order in which they were received with the typical review period deadlines utilized in the process.

1.12 How often have you published joint notices with FDOT?

The District has not published joint notices with the FDOT

Section II – After ETDM Implementation

2.1 Describe how your agency is organized in Florida?

The organization of the District is basically unchanged after the ETDM process has been implemented.

After the ETDM contract was executed, the District hired a contract engineer to oversee the day to day responsibilities under the ETDM process. The engineer has been hired as an OPS employee and has been added to the Resource Management staff . The Director of Resource Management oversees the contract engineer and the Resource Management Administrator assists with all the administrative issues associated with the ETDM process.

2.2 How does project information enter your organization?

Project information enters the District generally through the same mechanisms as before the ETDM, with the exception of those listed in bold:

- ❖ Inclusion on the FDOT project inventory pursuant to Section 373.4137, F.S.
- ❖ Circulation through the Florida State Clearinghouse process.
- ❖ Review of a local government proposed comprehensive plan amendment, development of regional impact (DRI), or other local government documentation.
- ❖ Receipt of an Advance Notification from FDOT or FDOT consultant.
- ❖ Pre-application meeting with regulatory staff.
- ❖ Newspaper and mailed meeting notices.
- ❖ Permit Applications
- ❖ **Quarterly interagency meetings between FDOT and SRWMD.**
- ❖ **Through e-mail notifications systematically tied to the Environmental Screening Tool (EST) with reviews required in the planning and programming screens.**
- ❖ **Semi-annual ETAT Coordination Meetings held by FDOT District 2.**

2.3 How many staff are involved and how are they allocated?

As discussed in 2.1, there are three staff members involved in the ETDM process.

The Director of Resource Management (assigned ETAT Coordinator) is responsible for the execution of the ETDM agreements, hiring personnel and overseeing the activities as required by the contract engineer. He approves all Advanced Payment Requests and invoices associated with the agreements and contracts. The Director also provides guidance and assistance with project review issues and concerns.

The Contract Engineer (CE) is responsible for all the day to day requirements as set forth under the agreements. The CE conducts all required planning and programming screens reviews, conducts field reviews, pre-application meetings, permit reviews and permit issuance, complaint reviews, and permit compliance for FDOT. The CE also conducts a quarterly meeting with FDOT District 2, and attends all required meetings and Task Teams as requested. The FDOT mitigation program is conducted by the CE, which involves all the necessary coordination, mitigation site assessments and design needed to provide the required mitigation for FDOT. The CE is also a project manager on several Quality Community projects with participation with FDOT. The CE prepares the Advanced Payment Requests and Annual Reports.

The Administrative Assistant assists with the preparation of the agreements, Advanced Payment Requests, and invoicing and also assists with required public notices and maintains the accounting information for the process.

2.4 Describe how Section 1309 funds have been used to streamline process?

Funding provided by the FDOT is utilized to fund additional staff resources necessary to provide advanced, more in depth reviews of projects through the use of the EST screening tool, through field reviews and historical analysis. These advanced reviews will assist and streamline the review of projects during the permitting phase and provide an advanced look at potential mitigation needs for the future. With mitigation needs determined earlier in the process, advanced mitigation projects can be produced on a more regional scale. The funding has provided staff necessary to review permit applications earlier than statutory requirements and has lead to improved coordination between the agencies. With the addition of a CE, field reviews, resulting in important feedback, can take place much earlier in the process and can continue to occur on a regular basis through the design and construction phases of the project. These actions can prevent potential construction violations and provide better protection for important resources.

2.5 How are projects assigned?

The CE receives notices through all of the mechanisms described in Section 2.2 concerning FDOT related projects. The CE is responsible to provide all reviews, feedback, and analysis as required by statute or agreement on FDOT projects. If project issues arise which may involve further coordination with other staff within the District, the CE will coordinate as necessary in order to provide the required information.

2.6 How frequently does staff consult or coordinate with FDOT on projects?

Coordination occurs approximately 10 times per month via e-mail or telephone concerning permit reviews, meetings, complaints, and for compliance issues. Coordination also occurs several times a month with FDOT consultants requesting clarifications on comments or assistance on permitting or construction related issues. Questions occasionally occur on potential permit modifications from construction changes. The CE also conducts a quarterly meeting with FDOT District 2 to go over active permit issues, future projects, complaints, permit compliance, mitigation, and joint participation projects. Semi-annual ETAT coordination meetings are conducted with District 2 on future and past projects which are being reviewed in the EST tool.

2.7 How many FDOT projects have been reviewed or coordinated with FDOT over the past year? How does this differ from prior to business practice?

Approximately 28 projects have been reviewed or coordinated with FDOT over the past year. These projects are all listed in the Program Reviews for Advanced Payment Requests for each quarter over the past year. These projects consisted of reviewing projects as part of the EST Planning and Programming screens, conducting pre-application and permitting reviews, conducting jurisdictional determinations and reviews with FDOT staff, coordinating joint participation projects with FDOT, and conducting complaint reviews, construction reviews and post permit compliance. In addition, mitigation plans were being developed for present and future projects. Past prior business practices limited staff involvement to pre-application meetings and permit application reviews. Mitigation plans were being developed for present projects only.

2.8 Describe your typical involvement with FDOT projects and at what phase that involvement occurs: Planning, PD&E, Permitting, etc...

The District is involved in several phases of a project's development and construction. Since the ETDM process has been developed, the District is more involved in the planning process with the notices through

the EST screening tool and the semi-annual ETAT coordination meetings. Advanced Notifications and Clearinghouse reviews are usually conducted during the PD&E phase. During the Design phase, the District is involved in pre-application meetings, field reviews, permitting meetings and maintains coordination throughout the permitting process. During the Construction phase, the District is involved in pre-construction meetings when requested to attend, construction and permit modifications, permit compliance issues and erosion control. The District is also involved during Operation and Maintenance Phase of a project making sure the stormwater management system is working properly and being maintained. This is reviewed with the three year certification process and through any potential complaints. Throughout all of these phases, the mitigation program is also being conducted on projects involving wetland impacts and mitigation. This would occur generally through all phases, similar to a transportation construction project.

2.9 How many staff hours per month are typically devoted working on FDOT projects? Planning Phase? PD&E phase? Permitting?

Through the past year, approximately 180 hours per month are spent dealing with FDOT related projects and issues. The following is an estimate of the hours spent in each phase:

- ❖ Planning Phase – 20 hours/month
- ❖ PD&E Phase – 30 hours/month
- ❖ Design/Permitting Phase - 110 hours/month
- ❖ Construction Phase – 10 hours/month
- ❖ Operation and Maintenance Phase – 10 hours/month

2.10 Describe your involvement with MPO's planning process?

Direct involvement with MPO is minimal except for the increased involvement through the ETDM process.

2.11 Describe instances of where early collaborative decision-making with FDOT has occurred to eliminate duplication or resolve issues?

At each of the District's quarterly meetings with the FDOT District 2, an agenda filled with issues involving permit review comments and responses, joint participation project issues, mitigation plans and inventories, complaints, post permit compliance issues, and future projects are discussed. These meetings were started in order to provide feedback on various issues and resolve problems in a cooperative efficient manner. It also provides a date when several FDOT departments can meet with the District to go over project issues involving all phases of projects.

2.12 When did your agency become aware of and receive public input on a transportation project? Planning? Programming? Project development

In general, the District does not receive public input on transportation projects unless potential flooding occurs as a result of contributions from FDOT roadways or flooding within FDOT roadways. As a result of these complaints and issues, several joint participation projects have been developed between the agencies to correct and remediate stormwater flooding issues within several communities within the District. Issues arise from the public concerning construction related complaints which are coordinated through telephone coordination and the quarterly meetings between the agencies.

2.13 How often have you published joint notices with FDOT?

Joint notices have not occurred to date.

2.14 What are the major barriers to coordination and involvement with FDOT projects: Issues to consider Budget? Staff? Other Resources? Time? Communication? Meetings? Field Reviews? Environmental Screening Tool?

Several barriers have been eliminated with the emergence of the ETDM process, however, concerns still exist on projects that involve fast schedules that require mitigation without notice prior to application. These projects are usually projects added to the work plan late in the process and involve wetland impacts associated with shoulder widening. Although these projects will continue, the ETDM agreements have given the District the resources to develop advanced mitigation projects which will provide mitigation for future wetland impacts. Another concern which appears will be addressed, is the coordination between MPO's, DCA, and resource agencies. Proper secondary and cumulative effects analysis can only be conducted if these agencies are coordinating so that LRTP's, Growth Plans and DRI's are being addressed as part of this ETDM process. Another issue involves the coordination with local drainage districts. At this point, it appears that this issue may need to be addressed since they are not yet connected into the ETDM process.

Since local drainage districts can have more stringent criteria, they can play a significant role in the development of a project.

2.15 What are some of the finding or results you have discovered related to your agencies operations, FDOT operations or the environmental process in general since participation in the MOU and agreements?

Participation in the ETDM process has provided the District with the ability to provide feedback to planners and designers at an earlier stage of project development which can only enhance the coordination needed to balance economic development with resource protection. Coordination has been greatly enhanced between agencies which have provided a mechanism for the District to provide more meaningful, timely reviews.

2.16 What recommendations would you make to improve the environmental streamlining of the process?

There are several District GIS layers that can be added into the EST tool which may be helpful on cumulative analysis. The potential addition of county and city LRTP's, Growth plans, DRI's and other plans may be helpful for future analysis. Historic aerials should be added to compare pre and post development within a region or drainage basin. The layer involving sink hole locations needs to be updated. The Secondary and Cumulative review headings needs to be separated into two distinct review headings as recommended by past task teams on this issue.

Section III – Agency Specific Performance Measures (PM) Questions

3.1 If your agency has established Performance Measures, describe how participation in ETDM process and streamlining has contributed to meeting these measures?

The only Performance Measure the District is currently tracking is reviewing permit applications within 30 days of receipt and issuing permits within 90 days of completion. The ETDM process has provided the resources to provide responses earlier than 30 days and provide permit issuance in a more timely manner.

3.2 Using EST reports, discuss how your agency has met the performance measures established in the ETDM Agreements.

Complete Planning and Programming Screens within 45 days – All Planning and programming screens have been conducted within this time frame.

Review environmental documentation within 30-45 days – No documentation was required to be reviewed.

Complete Conflict Management Process within 120 calendar days – No Conflict Management Process was initiated.

Conclusion

Participation in the ETDM process has provided the District with the opportunity to review and provide meaningful information to the FDOT and other agencies on resource issues throughout the planning and development of a project. The process has provided a mechanism for increased communication and coordination between the agencies. The additional staff resources, funded through the process, have enhanced the District's ability to provide improved service and quality through timely project reviews and permit issuance, more thorough reviews and improved decision making. The process has improved the ability of District staff to act on FDOT permit applications, complaints, permit compliance issues and assist on construction related issues in a more efficient manner.

The funding provided through the ETDM process, has enabled the District to hire a CE which provides the FDOT with a single point of contact for all FDOT related issues. The CE supplements existing staff and provides advanced comprehensive project reviews through the EST, field reviews, and available information within the District. The CE also provides assistance and reviews during each phase of a project and coordinates with FDOT through quarterly inter-agency meetings so that a variety of issues can be addressed cooperatively. Some of these issues include the concept of advanced regional mitigation, and joint participation projects to improve regional stormwater and recreational facilities.

As the process evolves and more experience is gained, the possibilities for greater use of this process are endless. The District looks forward to exploring the potential of performance based permitting, on-line permitting and views the process as a means to improve the coordination between Federal and State agencies with local government agencies such as cities, counties, and local drainage districts. Through the potential additions of local LRTP's, growth plans, and DRI's into the environmental screening tool, perhaps more beneficial planning will result. The improvements being made in the cumulative analysis

capabilities should enhance this communication effort. Perhaps public interest groups and concerned citizens will use this process so future problems and potential permit petitions can be avoided.