

Office of the Internal Performance Auditor

*Promoting Government Accountability While Providing Fair and
Objective Oversight, Insight, and Foresight into County Operations*



**Hillsborough County Board of
County Commissioners**

TO: Dr. Richard D. Garrity Ph.D., Director Environmental Protection
Commission

DATE: February 29, 2008

FROM:  Jim Barnes, Director Office of the Internal Performance Audit

SUBJECT: Process Audit FINAL Report

Please find enclosed a copy of the FINAL Report of the Process Audit of the Environmental Protection Commission Wetlands Division. The report contains a copy of your response. We would like to thank you and all of your staff in making this entire process a success. We want to provide you a copy and will be forwarding a copy to the Board of County Commissioners in the next few days as required by Board policy.

We are also attaching an Audit Customer Service survey for you to fill it out and provide feedback to us so we can continue to improve.

Thanks again for all of your cooperation.

If you have any questions please do not hesitate to contact Ken Gentile at (813) 274-6722.

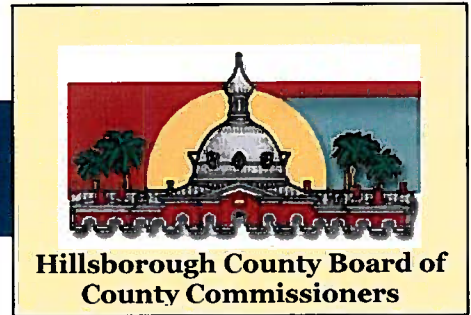
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FEB 29 2008

EPC Legal Dept.

P.O. Box 1110
Tampa, Florida 33601
Phone (813) 272-5331
www.hillsboroughcounty.org

Office of the Internal Performance Auditor



Customer Satisfaction Survey

Please fill out in its entirety:

Audited Organization:

Name of reviewer:

Date:

Phone:

On a scale from 1 to 5, where 5 is very satisfied and 1 is very dissatisfied, please rate the following: (circle responses)

Low —————> High

Understanding of the scope and
objective of the audit

1 2 3 4 5

Communication with the auditors

1 2 3 4 5

Auditors understanding of the issues

1 2 3 4 5

Professional manner in which the
audit was conducted

1 2 3 4 5

Timeliness of the entire audit from
start to finish

1 2 3 4 5

Usefulness of the recommendations

1 2 3 4 5

Audit services provided value

1 2 3 4 5

The final written audit report

1 2 3 4 5

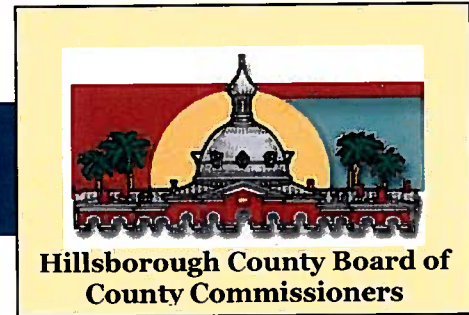
Overall satisfaction with the audit

1 2 3 4 5

Please tell us how we could have done a better job on this audit.

Please tell us in which area you feel the audit staff excelled. If none, write N/A.

Please make any additional comments or suggestions concerning any area of the audit.



February 2008

Report No. 08-01

Opportunities for Streamlining and Improving the Wetlands Development Review Process

Report in Brief

This report comprises the results of our agreed upon procedures review of the wetlands development review process. For the purposes of this report, this process is defined as the Environmental Protection Commission's (EPC) involvement in reviewing development applications originating from the Planning and Growth Management Department (PGMD) to ensure that development projects proposed and built in unincorporated Hillsborough County comply with the County's wetlands rules and standards in the Land Development Code. This is just one of several processes administered by EPC for the purpose of protecting the County's wetlands. EPC estimated that the costs associated with administering this process was about \$730,000 in FY 2007, which was almost entirely recovered through user fees.

The objective of our review was to identify opportunities for streamlining this process without undermining EPC's ability to effectively protect the County's wetlands. To accomplish this objective, we addressed two questions:

- 1) How effective has the process been in protecting the County's wetlands?**
- 2) What steps can be taken to streamline the process without undermining EPC's ability to effectively protect the County's wetlands?**

In addressing the first question, data collected by EPC indicates that its performance in meeting timeframes for reviewing development applications improved significantly from previous years during fiscal year (FY) 2007. However, due to inconsistencies found in the data, we were unable to validate this improvement. In addition, we were also unable to determine how effective the process and its individual components have been in protecting the County's wetlands. This is due to the absence of applicable performance information and data (e.g. acres of proposed wetland impacts that were avoided), which is an impairment to identifying opportunities for streamlining the process. Moreover, EPC was unable to provide evidence demonstrating the frequency in which its reviews were conducted in accordance with applicable policies, procedures and/or standards. Not having this information inhibits management and policy-makers from accurately assessing the effectiveness of their strategy. Finally, our analysis of

staffing, workload, and performance data suggests that unless improvements are made to the process, such as those identified in this report and others outlined in the Hybrid Plan,¹ timeliness and/or quality of service may diminish in the future. This underscores the need to identify and successfully implement solutions for improving the process.

To help address the second question, and compensate for the lack of available performance information, we facilitated a 2-day workshop consisting of pertinent stakeholders. This group included EPC staff, members of the Wetland's Technical Advisory Group, and PGMD staff. The group identified the following opportunities for streamlining and improving the process:

- Automating processes to the fullest extent possible.
- Eliminating preliminary reviews of subdivision and commercial projects where no wetlands are found on the property.
- Improving communication between EPC and PGMD.
- Exploring the feasibility of consolidating certain activities.
- Substituting EPC's attendance at pre-submittal conferences with a packet containing pertinent information, unless attendance is specifically requested.

In addition to the improvements identified by the workshop group, we conclude that EPC could improve the process by:

- Developing and reporting outcome-based goals, performance measures and indicators that show the extent the process has achieved its purpose (e.g. acres of wetland impacts avoided).
- Enhancing its current quality assurance program to ensure and document the extent quality reviews are consistently conducted.
- Working with PGMD and the development community to identify ways to reduce the amount of applications requiring resubmittal.

Objective and Scope

By the EPC Board's adoption of the Wetlands Hybrid Plan on August 17, 2007, and by the Hillsborough County Board of County Commissioners (BOCC) adoption of Resolution R07-154 on September 6, 2007, the Internal Performance Auditor (we) were authorized and directed to conduct an audit of the wetlands development review process. The objective of this audit, as described in the Hybrid Plan and in agreement with EPC executives, was to identify ways to streamline the wetlands development review process. The scope of our review was limited to those activities associated with this process, defined on page 1 of this report.

¹ In August 2007, EPC's Director presented and the EPC Board adopted a proposal called the Hybrid Plan. The goal of the Plan was to improve EPC's provision of wetlands services while maintaining local oversight over the County's wetlands. This would be achieved through the successful implementation of various rule, process, and personnel changes.

Methodology

We performed the following tasks in order to accomplish our objective:

- Interviewed EPC staff, PGMD staff, other County staff, EPC customers, and EPC interest groups;
- Reviewed applicable laws, codes, rules, policies and procedures;
- Observed EPC staff performing wetlands development review activities;
- Collected and analyzed financial, workload, staffing and other performance data;
- Facilitated a workshop consisting of process stakeholders;
- Assessed relevant internal controls; and
- Researched other jurisdictions that perform a similar service.

Background

EPC is the County's environmental regulatory agency. It was created in 1967 by a Special Act of the Florida Legislature.² The intent of the Act was to

“provide and maintain for the citizens and visitors of [Hillsborough County] standards which will insure the purity of all waters and soils consistent with public health and public enjoyment thereof, the propagation and protection of wildlife, birds, game, fish, and other aquatic life, atmospheric purity and freedom of the air from contaminants or synergistic agents injurious to human, plant, or animal life, and freedom from excessive and unnecessary noise which unreasonably interferes with the comfortable enjoyment of life or property or the conduct of business.”³

EPC is governed by a Board comprised of the same seven members who serve on the BOCC. EPC is empowered to establish rules and regulations necessary for the effective administration and enforcement of the provisions of its enabling legislation.⁴ Rules associated with the regulation of Hillsborough County's wetlands are found in Chapter 1-11 of EPC's Rules. The intent of these rules is to “preserve the essential character of wetland property,” “avoid the disturbance of wetlands in the County,” and “encourage their use only for purposes which are compatible with their natural functions and environmental benefits.”⁵

EPC employs 162 full-time equivalent (FTE) employees and performs its own administrative functions, including personnel, accounting, and information technology activities. EPC is organized into five operating divisions: Air; Environmental Resources Management; Waste; Water; and Wetlands Management. The subject matter of this

² A Special Act is a bill that applies to an area or group that is less than the total area or population of the state. The EPC was created by a Special Act that was applied to Hillsborough County.

³ Chapter 84-446, Section 2, Laws of Florida

⁴ Chapter 84-446, Section 5(2), Laws of Florida

⁵ Chapter 1-11.01, Rules of the Environmental Protection Commission of Hillsborough County.

report, the wetlands development review process, is administered directly by the Wetlands Management Division (Division). The Division was budgeted 25 FTE positions for FY 2008, down from 29 in FY 2007. The reduction in staff is the result of the implementation of the Hybrid Plan. The composition of the Division's staff from FY 2004 to FY 2008 is shown in Exhibit 1.

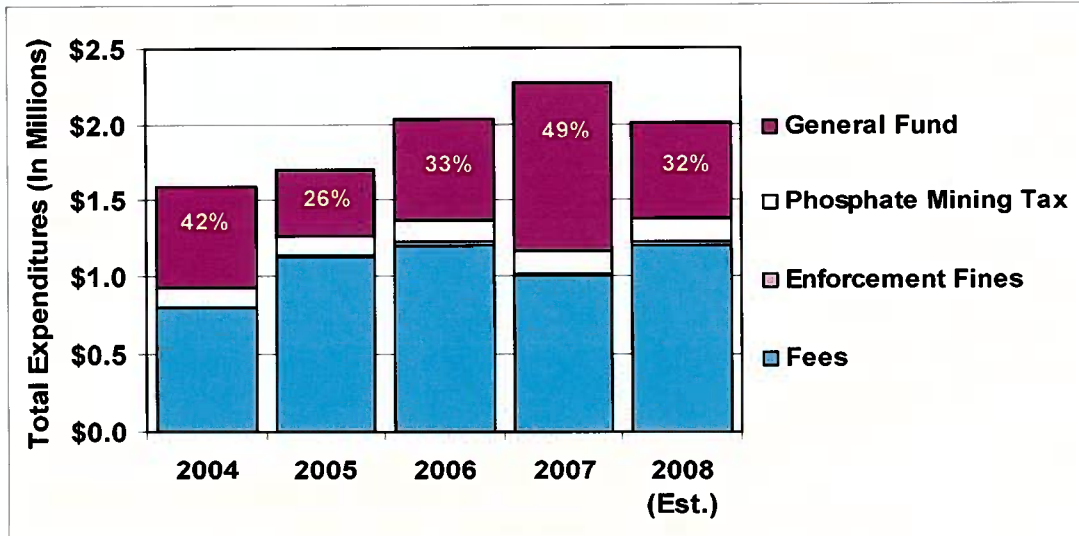
Exhibit 1: Division FTE Positions by Function, FY '04 – FY '08

	FY 2004	FY 2005	FY 2006	FY 2007	FY 2008 (Budgeted)
Wetlands Assessment/ Scientists	6.5	6.5	9.5	9.5	8.5
Compliance/ Enforcement	7.5	7.5	8.5	8.5	7.5
Engineering	3	3	3	3	3
Support/ Administration	5	5	5	5	4
Management	2	2	3	3	2
Total	24	24	29	29	25

Source: EPC

Exhibit 2 shows the Division's expenditures by revenue source from FY 2004 to FY 2008. Annual increases in expenditures are attributed to rising inflation and increases in staffing levels. The reduction in expenditures estimated to occur during FY 2008 is primarily due to the staffing reduction resulting from implementation of the Hybrid Plan. The red portion of each bar, and the percentage values therein, reflect the proportion of the Division's total expenditures paid for using General Fund monies, which primarily consists of Ad Valorem tax revenue. However, the subject matter of this report, the wetlands development review process, is almost entirely self-supporting. Opportunities for reducing General Fund subsidies into the Division may be available in other services provided by the Division.

Exhibit 2: Division Expenditures by Revenue Source, FY '04 – FY '08



Source: EPC and FAMIS

EPC performs a variety of services for the purpose of protecting the County's wetlands. They include:

- Wetland delineation;⁶
- Wetland permitting;⁷
- Compliance monitoring;⁸
- Investigating unauthorized activities affecting wetlands;
- Performing wetlands assessments for the Tampa Bay Port Authority;
- Reviewing proposed comprehensive plan amendments; and
- Providing wetlands advisory services to customers and the public.

In addition to these services, EPC also administers the wetlands development review process, which is the subject matter of this report.

The wetlands development review process is one element of a much larger process called the land development review process which is administered in accordance with the Hillsborough County Land Development Code (LDC). Per the LDC, all development in unincorporated Hillsborough County must undergo a review process in order to "foster and preserve public health, safety, comfort and welfare, and to aid in the harmonious, orderly, and progressive development of the unincorporated areas of Hillsborough County..."⁹ The land development review process consists of activities performed by up to 21 different reviewing entities¹⁰ (including EPC) to ensure that development is "conceived, designed, and built in accordance with good planning and design practices" and minimum LDC standards.¹¹ The land development review process is coordinated by PGMD. The wetlands development review process is a term that refers to EPC's role and participation in this larger process.

The land development review process is initiated when an applicant submits multiple copies of an application to PGMD's Intake Section. Once received, PGMD staff performs a completeness review of the application to ensure all required materials are present. If any are found to be absent, the applicant is notified that s/he must submit missing materials. Once the application is found to be complete, PGMD staff distributes a copy of the application to each participating reviewing entity. Participating reviewing entities are determined in a number of ways. In some cases an entity's participation is

⁶ A wetland delineation study is the application of a scientific methodology established by state rule for determining the landward extent of wetlands.

⁷ EPC refers to wetlands permitting as its internal review process. It includes authorizing or denying impacts to wetlands and developing mitigation agreements with the applicant.

⁸ Consists of inspecting wetland mitigation sites to determine compliance with mitigation agreements.

⁹ Section 1.02.03(A), Hillsborough County Land Development Code

¹⁰ Reviewing entities include PGMD Zoning, Stormwater, Utilities, Natural Resources, Concurrency, and Transportation teams; Hillsborough County Streets and Addresses, Fire and Rescue, Health Department, Traffic, Lighting Plans, Real Estate, and Parks and Recreation departments; the Planning Commission; Hartline; the Florida Department of Transportation; Hillsborough County School Board; and EPC.

¹¹ Section 1.02.03(B), Hillsborough County Land Development Code

required by the LDC or the Development Review Procedures Manual (DRPM).¹² In other cases the LDC and the DRPM state that an entity "may" participate if it is determined appropriate during a pre-submittal meeting. Although EPC's participation in the land development review process is required for some review types, its participation falls into the "may" category in many cases. In November 2006, EPC requested to PGMD that it participate in reviewing most applications that are submitted to PGMD.

Because not all reviewing entities are physically located at PGMD's Intake Section, applications are distributed to the reviewing entities through various means, including interoffice mail and courier. EPC is located off-site and receives applications by courier, a process that may take as long as 2 days.

Once EPC is in receipt of an application, staff performs a review. The nature and scope of the review depends upon the type of development activity proposed (e.g., a subdivision or a phosphate mine), the stage of the development process (e.g., preliminary or construction), and the information provided by the applicant. However, EPC's review generally consist of an examination of a site plan, development application, and aerial map compared with criteria found in EPC's standard operating procedures, rules, and standards in the LDC. Sometimes a site inspection is performed as part of the review. Finally, comments based on the review are prepared by EPC staff and distributed to the applicant and back to PGMD. Reviews at the construction review phase are conducted by engineers who examine, among other things, impacts to wetlands which may be located off-site.

EPC staff noted that their participation in the land development review process (i.e. their administration of the wetlands development review process) helps them protect the County's wetlands in a number of significant ways. In general, EPC staff noted that the central purpose of the wetlands development review process is to help steer developers away from impacting wetlands early in the development process. For example, EPC is able to communicate and document its concerns regarding impacts to wetlands early in the development review process. Also, EPC asserted that its review comments help to educate developers who are unfamiliar with the County's wetlands rules.

How effective has the process been in protecting the County's wetlands?

Data collected by EPC indicates that its performance in meeting timeframes for reviewing development applications improved significantly from previous years during FY 2007. However, due to inconsistencies found in the data, we were unable to validate this improvement. In addition, we were also unable to determine how effective the process and its individual components have been in protecting the County's wetlands. This is due to the absence of applicable performance information and data (e.g. acres of proposed wetland impacts that were avoided), which is an impairment to identifying opportunities for streamlining the process. Moreover, EPC was unable to

¹² The DRPM is a publication consisting of the procedures for administering the LDC and technical design manuals.

provide evidence demonstrating the frequency in which its reviews were conducted in accordance with applicable policies, procedures and/or standards, which inhibits management and policy-makers from assessing the effectiveness of their strategy. Finally, workload projections made by EPC suggest that unless improvements are made to the process, such as those provided in this report and others outlined in the Hybrid Plan, timeliness and/or quality of service are likely to diminish in the future. This underscores the need to identify and successfully implement solutions for improving this process.

EPC data indicates that its performance in meeting timeframes for reviewing development applications improved significantly from previous years during FY 2007. However, due to inconsistencies found in the data, we were unable to validate this improvement.

Literature on conducting process evaluations suggest that the methodology for streamlining a process involves an in-depth analysis of how effective the process and its individual components have been in achieving the purpose of the process. Components of a process should be examined based on the value they add towards achieving the purpose of the process, which, in this case, is to protect the County's wetlands. Those components found to add little or no value to the purpose of a process should be considered for elimination.

To this end we sought to analyze available performance information related to this process and its individual components. We found the performance information developed and reported by EPC to be useful for many purposes. However, because it was inclusive of activities that were not within the scope of our review, we could not use it for drawing conclusions specific to the wetlands development review process. For example, the workload measure: "number of land development permits processed" included activities associated with the wetlands development review process and activities not associated with the process (e.g., wetland delineation studies and mitigation studies). Thus, we could not isolate EPC's performance in administering the wetlands development review process using available performance information.

With EPC's assistance, we developed measures and indicators of EPC's performance in administering the wetlands development review process. The results of our combined efforts are shown in Exhibit 3. It is important to note that the indicators presented in the Exhibit represent estimates that were derived by collecting and analyzing the best information available. The definition, methodology and origin of each indicator are provided in footnotes. The Exhibit presents measures and indicators at input, output, efficiency, and effectiveness levels. Inputs refer to the resources in terms of staff and money that go into a program. Outputs refer to the number of activities performed or services provided, such as number of applications reviewed. Efficiency refers to the relationship between inputs and outputs, such as output per staff or cost per unit. Effectiveness refers to the quality of service provided, such as timeliness of service, customer satisfaction, and the extent the purpose of the program was achieved.

Exhibit 3: Wetlands Development Review Process Performance Information, FY '04 – FY '08

Measurement Type	Measures	Indicators				
		FY 2004	FY 2005	FY 2006	FY 2007	FY 2008 (Estimated)
Input	Cost ¹³	\$610,000	\$630,000	\$660,000	\$730,000	\$690,000
	FTE's ¹⁴	7	7	9	9	8
Output	Workload ¹⁵	2656	2924	2978	2770	2795
Efficiency	Workload per FTE ¹⁶	379	418	331	308	349
Effectiveness	Frequency Mandated Timeframes Were Met	69%	58%	58%	84%	Unknown
	Acres of wetland impacts avoided	No data	No data	No data	No data	To be determined

Source: IPA analysis of information and data provided by EPC. **It is important to note that the indicators presented in this Exhibit represent estimates derived by collecting and analyzing the best information available. They should not be considered as absolute.**

Exhibit 3 shows a number of trends related to performance that have occurred since FY 2004. Inputs increased from FY 2004 to FY 2007, then decreased in FY 2008 as a result of implementing the Hybrid Plan. Output increased between FY 2004 and FY 2006, declined in FY 2007, and was projected by EPC to slightly increase during FY 2008. According to EPC, workload levels are integrally tied to conditions in the building industry, which makes projecting future workload difficult due to the myriad of factors that influence the building industry. Workload per FTE declined between FY 2005 and FY 2007, which can be explained by the addition of 2 FTE positions in FY 2006 and the reduction in workload that occurred during FY 2007. Workload per FTE is an important measure for EPC to monitor because it is reflective of staff productivity. If staff sustains excessive levels of workload over a prolonged period, quality of service and employee morale typically will suffer. On the other hand, idle staff is an inefficient use of

¹³ FY 2006 and FY 2007 indicators were produced by EPC by estimating the percentage of time staff spent performing wetlands development review process activities and then multiplying this percentage with appropriate personnel, operating and capital costs. FY's 2004, 2005, and 2008 are estimates made by us using EPC estimates for FY 2006 and FY 2007 as leading indicators.

¹⁴ Indicators for FY's 2006 and 2007 were produced by EPC by estimating the percentage of time staff spent performing wetlands development review process activities. FY's 2004, 2005, and 2008 are estimates made by us using EPC estimates for FY 2006 and FY 2007 as leading indicators.

¹⁵ Represents the total number of reviews of development applications originating from PGMD and the County's municipalities. Includes reviews of subdivision projects, commercial projects, land excavation projects, land alteration projects, and phosphate mining projects. Also includes setback encroachment reviews and pre-submittal meetings. Estimated figure for 2008 was produced using the projected workload figure reported by EPC in the FY 2008 and FY 2009 Recommended County Budget.

¹⁶ Represents the ratio of workload and FTE positions

resources. EPC should establish goals for workload per FTE that reflect an appropriate balance between these factors so that it can more effectively manage its staffing levels and maximize productivity.

The first effectiveness measure in Exhibit 3 indicates EPC's performance in meeting timeframes for reviewing applications associated with the wetlands development review process. EPC, like all other participating reviewing entities, is required to complete their reviews within mandated timeframes which are found in the LDC and DRPM.

Adherence to these timeframes is important to developers because it helps them make best use of their resources and adequately plan their projects and assess associated risks. The timeframes vary depending upon the type of development activity proposed, the stage in the development process, and whether the submittal is an initial submittal or a resubmittal.

EPC's performance in meeting timeframes was weak from FY 2004 to FY 2006. EPC attributed its weak performance in meeting timeframes during these years to understaffing, turnover in experienced staff,¹⁷ sustained periods of extremely high workload levels, and the high frequency of applications requiring resubmittal. According to EPC, the added workload burden caused by resubmitted applications is a particular problem. EPC attributed the high quantity of resubmittals to applicants submitting incomplete applications and applications that severely deviate from the requirements.

Timeframes for reviewing these applications are shorter, thus they are given priority over initial submittals. EPC's performance improved significantly during FY 2007. This improvement was attributed to the reduction in workload that occurred in the same year and the maturing of new staff. However, inconsistencies found in the data prevented us from validating this improvement. For example, we found several instances in which due dates in EPC's database were in excess of those prescribed in the DRPM.

Due to the absence of applicable performance information and data, we could not determine how effective the process or its individual components have been in protecting the County's wetlands. This impaired our ability to identify opportunities for streamlining the process, and impairs EPC's as well.

BOCC Policy 03.02.02.15 and Hillsborough County budget procedures require all County organizations to develop and report measures of effectiveness. Effectiveness measures indicate how well a service is being provided. With regard to its wetlands services, EPC reports the percentage of reviews conducted within review timeframes and two other measures related to mitigation compliance (mitigation compliance is not within the scope of this review) as measures of effectiveness. These are meaningful measures for both managers and policy-makers to monitor; however, they do not indicate EPC's effectiveness in achieving its central purpose, which is to protect the County's wetlands.

¹⁷ Between July 2004 and August 2006, the Division lost 5 staff with a combined 30 years of experience in conducting wetlands development reviews.

We attempted to collect and analyze data and other evidence to determine the extent the wetlands development review process contributed to protecting the County's wetlands. EPC reported approving 27 acres of wetland impacts in FY 2007, and requiring 337 acres of mitigation as compensation for those impacts. Again, this is valuable information, but it does not relate to the essential purpose of EPC's wetlands rules, which is to avoid impacts to wetlands. A possible measure of this would be the number of acres of proposed wetland impacts that were avoided due to EPC's administration of the wetlands development review process. Because no information was available to determine this, the benefit realized through EPC's administration of the process is largely unknown (see the second effectiveness measure in Exhibit 3). EPC staff told us that they have recognized this need and have begun to collect data that will allow them to report this in the future.

EPC was unable to provide evidence demonstrating the frequency in which its reviews were conducted in accordance with applicable policies, procedures and/or standards. Not knowing this information inhibits management and policy-makers from accurately assessing the effectiveness of their strategy.

As previously stated, EPC reports its performance in meeting timeframes for reviewing applications as a measure of effectiveness. Effectiveness measures are to indicate the quality of service provided. Timeliness of service, however, is only one aspect of quality, as EPC could review applications within any given timeframe if it were to discontinue its focus on conducting quality reviews. A possible measure of quality for wetlands development review process activities would be the frequency in which reviews were conducted in accordance with applicable standards, policies and procedures. EPC reported that its quality assurance program consists of protocols for training staff and ensuring they are fully qualified to effectively perform their job duties. Supervisors monitor employee performance by holding regular staff meetings, reviewing and editing all written correspondence, and providing training. In addition, EPC uses an electronic database to track the status of applications and supervisors routinely generate reports to help them ensure deadlines are being met.

However, EPC was unable to provide data or other kinds of evidence demonstrating the results of its quality assurance efforts (i.e. the extent quality reviews were consistently conducted). Thus, we are not able to report the extent EPC consistently conducts quality reviews. EPC could address this need by enhancing its quality assurance program, possibly by instituting a formalized external or internal peer review process, to help ensure and provide evidence that quality reviews are consistently conducted in accordance with applicable standards, policies and procedures. For example, EPC supervisors could draw a sample of all completed reviews and assess them to determine the percentage meeting all applicable policies, procedures and standards. The results of this exercise could be reported as an additional measure of effectiveness. Instituting such a program would enable EPC to identify root causes in the case where they were not meeting defined outcome goals.

Unless improvements are made to the process, timeliness and/or quality of service may diminish in the future.

EPC data indicates that its performance in meeting timeframes was strongest during FY 2007. Not surprisingly, this occurred in the year where workload per FTE was the lightest in comparison with previous years (see Exhibit 3). EPC estimated a slight reduction in workload for FY 2008 as compared with FY 2007 levels. At first glance, this suggests that EPC's performance in meeting timeframes will further improve during FY 2008. However, the estimated reduction in workload will be offset by the reduction in staff, resulting in an increase in workload per FTE for FY 2008. If actual workload mirrors projected workload, workload per FTE during FY 2008 will be closer to workload per FTE levels in previous years in which performance in meeting timeframes was weakest. Therefore, it appears that unless improvements such as those identified in this report and others outlined in the Hybrid Plan are successfully implemented, timeliness and/or quality of service is likely to diminish in FY 2008.

We identified three broad options for making such improvements. One is to increase staffing levels. This, however, is not a viable option given current budget constraints and EPC's commitment to implementing the Hybrid Plan. Another option is to increase timeframes for reviewing applications. This is not an attractive option because the timeframes are the same for all reviewing entities who participate in the land development review process. Thus, increasing timeframes for EPC's reviews would slow down the entire land development review process. The third option is for EPC to streamline and improve the process. This was the option proposed by EPC in the Hybrid Plan, and, given the above constraints, it appears that this is the only feasible option available.

What steps can be taken to streamline and improve the process?

Streamlining and improving any process involves an in-depth analysis of the value added by each individual component of a process to the overall purpose of the process. Those components found to add little or no value to the overall purpose of the process should be considered for elimination. Our ability to perform this kind of analysis was greatly impaired because performance information and data related to the process and its individual components was lacking. To compensate for the lack of quantitative performance information, we facilitated a 2-day workshop consisting of pertinent stakeholders to identify opportunities for streamlining and improving the process. The group included EPC staff, members of the Wetland's Technical Advisory Group, and PGMD staff. The group identified the following opportunities for streamlining and improving the process:

- **Automating processes to the fullest extent possible.** The group identified automation as the area where the most significant improvement could be made. Opportunities for doing so include but may not be limited to:
 - forwarding review comments to PGMD by email instead of fax;

- acquiring access to PGMD's Permits Plus system and receiving appropriate training and technical support necessary to use it so that EPC can confirm fees have been secured and project review delays can be avoided;
- providing EPC access to PGMD's other systems including Optix, Access, GIS Viewer and any others in order to maximize use of electronic document transfer and electronic plans reviews; and
- incorporating EPC into any new PGMD automation projects.

These opportunities should be explored fully by managers and information technology staff from both the EPC and PGMD. An action plan to further automate processes should be prepared and submitted to the EPC Board for its review by its May 2008 meeting.

- **Eliminating certain reviews of projects where no wetlands are found.** EPC currently reviews most all applications that are submitted to PGMD, regardless of whether wetlands are located on the property. According to EPC, the value realized through EPC's review of preliminary plan applications where no wetlands are located on the property is minimal. The consensus of the group was that no significant adverse impacts will result if EPC ceases reviewing preliminary plans for subdivision and commercial projects if a no wetland determination has been obtained. Doing so will free up staff time to devote to projects affecting wetlands. EPC reviews impacts to off-site wetland areas during the construction review phase, which would not be changed. Documentation of a no wetland determination should be added to PGMD's Site and Subdivision Review Intake customer checklist.
- **Improving communication between EPC and PGMD.** The group agreed that ongoing communication between EPC and PGMD is essential for continuing to refine, streamline, and improve processes. Staff from both agencies should meet on a regular basis to keep each other abreast of issues and discuss ways to continually improve processes. For example, PGMD is planning to facilitate process improvement workshops with the development community in the near future. It would be beneficial for EPC to participate in these and other similar workshops.
- **Exploring the feasibility of consolidating certain activities.** Workshop participants stressed that opportunities for efficiencies may be gained by consolidating engineering reviews and inspections. For example, PGMD's stormwater engineers, who review water flows and flood levels, and EPC's wetlands engineers, who review water volume retention to ensure adequate hydration and wetland functionality, may be able to consolidate certain activities associated with their reviews. Details about the extent such opportunities are available and feasible need to be explored further. Appropriate representatives from EPC and PGMD should meet to explore such opportunities further by May 2008.

- **Substituting EPC's attendance at pre-submittal conferences with a packet containing pertinent information unless attendance is specifically requested.**

In addition to the improvements identified by the workshop group, we conclude that the process could also be improved by

- **Developing and reporting outcome-based goals, performance measures, and indicators that show how effective the process and its individual components have been in protecting the County's wetlands.** EPC has recognized this need and has begun collecting data that will allow it to measure and report the acreage of proposed wetland impacts that were avoided due to each of its processes.
 - **Enhancing the current quality assurance program, possibly by instituting a formalized external or internal peer review process, in order to help ensure that reviews are consistently conducted in accordance with applicable standards, policies and procedures.** The results of this program could be used by managers and policy-makers as a powerful tool for improving EPC's effectiveness and identifying and addressing root causes for why outcomes are not achieved.
 - **Identifying ways to reduce the amount of applications requiring resubmittal.** Resubmitted applications account for a significant portion of wetland development review process workload. To reduce the amount of resubmitted applications, EPC should work with the development community and PGMD to identify solutions that address the root causes for resubmittals.
-

Acknowledgements

We express our appreciation and thanks to the staff of EPC and PGMD for the courtesies extended to us and for their assistance and cooperation.

Contact Information

This report was produced by Ken Gentile (gentilek@Hillsboroughcounty.org), Billy Poulos (poulosb@Hillsboroughcounty.org) and Chad Lallemand (lallemandc@hillsboroughcounty.org). Questions or comments should be directed to these e-mail addresses or to our office at 813-272-5331.

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Brian Blair
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3629 Queen Palm Dr. • Tampa, FL 33619
Ph: (813) 627-2600
Fax Numbers (813):
Admin. 627-2620 Waste 627-2640
Legal 627-2602 Wetlands 627-2630
Water 627-2670 ERM 627-2650
Air 627-2660 Lab 272-5157

Executive Director
Richard D. Garrity, Ph.D.

February 22, 2008

Mr. James Barnes
County Internal Performance Auditor
County Center, 2nd Floor
601 E. Kennedy Blvd
Tampa, FL 33602

SUBJECT: Opportunities for Streamlining and Improving the Wetlands Development
Review Process, Report No. 08-01, January 2007

Dear Mr. ^{Jim}Barnes:

We would like to take this opportunity to thank you and your staff for performing in an extremely helpful and professional manner. We find the report to be very thorough and helpful in moving forward with the Wetlands Hybrid Plan. The recommendations of your staff to modify our data collection efforts are meaningful and are being incorporated into our database. Many of the recommended steps and procedures for streamlining and automating the process have already been implemented. Our MIS staff has been meeting with PGM to follow up on procuring equipment and software to further improve the process.

The recommendation to improve communications between EPC and PGM staff is a very valid step in improving the overall process and has already been initiated. This process improvement will include identifying ways to reduce the amount of applications requiring re-submittal. Regarding improved performance measures, Sr. Staff has undertaken the process of identifying and improving our performance measures on an agency-wide basis. It has been made a part of our Agency Goals and Objectives.

Although the workload measures in the report do not reflect activities outside the development review process, such as wetland delineations and impact/mitigation reviews, these are important activities that support the development review process and need to be considered. Our Technical Advisory Group is, in fact, considering correlating these activities more closely to the land development review process.

EPC staff will develop and implement action plans to meet the 2008 time frames of your recommended improvements.

We look forward to your final report incorporating our comments. We will present the report at the March 20, 2008 EPC Board meeting. Your attendance will be appreciated.

Sincerely,

Richard D. Garrity, Ph.D.