COON CREEK WATERSHED DISTRICT
Request for Board Action

MEETING DATE: May 11, 2015
AGENDA NUMBER: 19
ITEM: Advisory Committee Comments on Potential Change to Permit Application Deadline

POLICY IMPACT: Discussion
FISCAL IMPACT: na

REQUEST
Review and discuss comments and provide direction to staff.

BACKGROUND
At the March 9 meeting the Board reviewed and discussed the potential of moving the application due deadline from 12 ½ days before the Board meeting (Wednesday noon) to 14 ½ days (Monday noon).

The reason for the proposed change was to more adequately address both the increase in volume of permit applications, but the increase in complexity and requirements for review of sites (considering the potential additions of water quality standards, groundwater, flood elevations and T&E species). And, in addition, the District’s commitment to coordination and collaboration with other units of government involves additional time.

The Board directed staff to review the proposal with the Advisory Committees. The Citizen Advisory Committee reviewed and discussed the proposal at their March 11 meeting. The Technical Advisory Committee reviewed and discussed the proposal at their March 18 meeting.

At the March 23 meeting the Board directed staff to seek input from parties directly affected by the rule change. Two focus groups were held to review the proposal and seek feedback and suggestions or alternatives.

<table>
<thead>
<tr>
<th>Group</th>
<th>Date</th>
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<tbody>
<tr>
<td>Developers</td>
<td>April 29</td>
</tr>
<tr>
<td>Engineers</td>
<td>May 5</td>
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COMMENTS

Developer Focus Group Comments:
1. Very supportive of the District taking the time and having the information it needs to adequately review proposals and seek designs that work for the overall system

2. Suggested, or strongly recommended, that the District seek to require either the pre-application meeting or something similar to sketch plan approval. If the project is
small enough and/or has all of the needed information, the application could be forwarded to the Board for full approval.

**Engineer Focus Group Comments:**
1. Supportive of the change, as long as the process doesn’t take more than 6 weeks

2. Mixed response to requiring pre-app meeting or sketch plan approval, although all believed it was beneficial

**Citizen Advisory Committee Comments:** Overall supportive of the change.

<table>
<thead>
<tr>
<th>Arguments Pro</th>
<th>Arguments Con</th>
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<tbody>
<tr>
<td>Makes sense</td>
<td>Opposed to anything that extends or lengthens the review time.</td>
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<tr>
<td>Allows for more thorough review</td>
<td>It works against resubmittals – unless resubmittals are allowed to resubmit Wednesday by noon.</td>
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<td>Helps prevent staff burnout. More deliberative.</td>
<td></td>
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<tr>
<td>Presentation did not account for issues,</td>
<td></td>
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<tr>
<td>tabled/resubmittal work load, inspections</td>
<td></td>
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<td>or enforcement issues</td>
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**Technical Advisory Committee Comments:** Overall supportive of the change.

<table>
<thead>
<tr>
<th>Arguments Pro</th>
<th>Arguments Con &amp; cautions</th>
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<tbody>
<tr>
<td>The District provides quick turnaround, way faster than anyone else.</td>
<td>Monday at 2:00 PM would be better than Noon.</td>
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<tr>
<td></td>
<td>Put this requirement in policy, NOT ordinance or rule.</td>
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<td></td>
<td>It works against resubmittals – unless resubmittals are allowed to resubmit Wednesday by noon.</td>
</tr>
</tbody>
</table>

**Suggestions/Requests**
1. **Require** either the pre-application meeting or something similar to sketch plan approval. If the project is small enough and/or has all of the needed information, the application could be forwarded to the Board for full approval.
2. Would like the District then to also consider “Administrative Approval” on some projects, especially for erosion control.

3. Frustrated that application’s incompleteness may not be realized until the following Tuesday

4. Encouraged to reconsider electronic submittals

**ISSUES/CONCERNS**

1. Put this requirement in policy, NOT in rule.

2. **Require** either a pre-application meeting or sketch plan approval:

3. Wednesday Resubmittal of Tabled Projects:

4. Administrative Approval of Erosion Control Plans

5. Timeliness of Completeness Determination

6. Reconsideration of electronic submittals

**OPTIONS**

1. Direct staff to post rule amendment changing language from 12½ days to 14 days

2. Continue to discuss

**RECOMMENDATION**

Discuss and consider the suggestions and issues and concerns.