



# Florida Department of Environmental Protection


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Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

**TO:** George Roberts, Chair NFWFMD  
Douglas E. Barr, ED NFWFMD  
Donald J. Quincey, Jr., Chair SRWMD  
David Still, ED SRWMD  
W. Leonard Wood, Chair SJRWMD  
Kirby B. Green, III, ED SJRWMD  
Ronald E. Oakley, Chair SWFWMD  
David Moore, ED SWFWMD  
Joe Collins, Chair SFWMD  
Tommy Strowd, Interim ED SFWMD

**FROM:**  Melissa L. Meeker, Deputy Secretary for Water Policy and Ecosystem  
Projects

**DATE:** April 25, 2011

**SUBJECT:** Permitting Information

The Department compiles various permitting statistics in order to analyze permit application trends, agency performance, and budget and staffing needs. The information is essential to quality decision-making.

Two key measures among many are permit application "time in house" and the number of agency requests for additional information (RAIs). The number of RAIs bears some relationship to time in house and both measures may reflect the quality of permit applications and responses to requests for information, the clarity of agency requests, the clarity of our rules, differences in permitting staff experience and expertise, differences in the quality of consultants and agents, etc. Thus, this basic information answers some questions but, more importantly, it raises others that additional data can help answer and lead to better management.

In order to better understand and improve our collective permitting performance, I will be asking you over the next several months to share water management district data similar to that which we are reviewing. As a starting point, please provide the following:

- Number of permit applications received in each of your program areas, by year, for each of the last six full years (2005 – 2010);
- Average and median “time in house” for all permit applications for each year during the same time period, by program area. *“Time in house” means all time from receipt of application to final agency action, including all tolled time.*
- Average number of RAIs each year for the same time period, by program area.
- Number of permit processors (FTE) in each program area during the time period.

In addition to the summary, please also provide the raw data in an Excel spreadsheet or compatible format. You are welcome to share any other permitting metrics you find informative. As I noted, this request is a starting point to initiate an ongoing discussion on improving permitting performance.

The Department has also recently established uniform procedures, including levels of approval, for the issuance of RAIs (attached for your information). We want to promote thorough reviews, clear expectations and prompt, sound decisions. I know you share those objectives as well. Please advise if you have formally established such policies as well and, if so, what they entail.

Please submit your information, electronically, to Kara Nevin ([kara.nevin@dep.state.fl.us](mailto:kara.nevin@dep.state.fl.us)) no later than May 16, 2011.

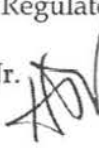
cc: Jeff Littlejohn, Deputy Secretary for Regulatory Programs  
Kara G. Nevin, Office of Water Policy and Ecosystem Projects

## Memorandum

## Florida Department of Environmental Protection

**TO:** Regulatory Division Directors  
Regulatory District Directors

**CC:** Jeff Littlejohn, P.E.  
Deputy Secretary for Regulatory Programs

**FROM:** Herschel T. Vinyard Jr.   
Secretary

**DATE:** March 22, 2011

**SUBJECT:** Policy for Requests for Additional Information (RAI)

To ensure that the Department is reviewing permit applications in a timely fashion, I am establishing a formal policy for the review and management of Requests for Additional Information (RAI) in the permitting process. I understand that the regulatory divisions and districts currently have management review procedures in place, and this new regulatory-wide policy will be more rigorous and will ensure consistency across the divisions and district offices.

Effective immediately, the following policy will apply to RAIs:

**1<sup>st</sup> RAI** -- Will require a mandatory review by the permitting supervisor. The RAI can be signed by the permit processor or the permitting supervisor.

**2<sup>nd</sup> RAI** -- Must be signed by the program administrator.

**3<sup>rd</sup> RAI** -- Must be signed by the district director (districts) or bureau chief (divisions). In addition, each district and division must submit a monthly report through the Deputy Secretary for Regulatory Programs of the 3<sup>rd</sup> RAIs issued and an explanation of why the RAI was issued.

**4<sup>th</sup> RAI or more** -- Will require my approval prior to issuing the 4<sup>th</sup> or more RAI.

In addition, all RAIs should be sent to the project owner, not only consultants and agents, so that the owner is aware of the application's status.