

ASWM State Wetland Program Integration Case Study: Indiana

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Improving Program Efficiency for Wetland and Stormwater Permitting through Joint Management in Indiana



State Wetland Program Information

This case study¹ explores the integration efforts undertaken by the Indiana Department of Environmental Management (IDEM). Established in 1986, IDEM’s mission is “to implement federal and state regulations to protect human health and the environment while allowing the environmentally sound operations of industrial, agricultural, commercial and government activities vital to a prosperous economy.”²

With an annual operating budget of approximately \$1 million IDEMS Wetlands Program is managed by a Section Chief overseeing a team of twenty one full-time staff. Program staff include seven Environmental Specialists, seven Stormwater Project Managers, and seven project managers who guide permit applicants through the pre-application, permitting, monitoring and enforcement process.

¹ Project Case Study Criteria: The Association of State Wetland Managers (ASWM) conducted interviews with representatives from state wetland programs actively integrating with one or more additional resource management programs operating within their state. Criteria for case study inclusion required eligible programs to demonstrate direct or indirect impacts of integration on watershed-level planning, implementation and/or outcomes documented using formal or informal performance measures. Further consideration was given to integrated programs with the ability to provide cost-benefit insights.

² Header. (n.d.). Retrieved from <https://www.in.gov/idem/cleanwater/2330.htm>

Type of Integration Effort

IDEM's integrated Wetlands Program administers Indiana's wetland and stormwater permitting, monitoring and enforcement activity promoting efficiency and continuity in the management of these important resources and processes.

Scale of Integration Effort

The Wetland Program has statewide jurisdiction over all permitting, monitoring and enforcement related to wetlands and stormwater. This includes everything from construction through 401 certifications. Some other types of permitting are delegate to Indiana's Soil and Water Conservation Districts (SWCD) including Municipal Separated Storm Sewer System (MS4s).

Project Leadership

The Wetlands Program is operated by IDEM. Water Director Martha Clark Mettler spearheaded the effort to integrate the state's wetland and stormwater management along with support from the organization's senior management. Current operational leadership includes Branch Chief Brian Wolff, Section Chief Randy Braun, and Sr. Wetland Specialist Jay Turner.

Integration Goals

By integrating the Wetland and Stormwater Programs IDEM aims to increase program efficiency, streamline compliance measures, and better support the regulated community. Through collaboration and cross training integration increases the program's capacity to process permit applications, monitor and enforce regulations, and respond to permittee questions and complaints in a timely manner.

Integration Process Timeline

While Indiana's Wetland Program has always been under the purview of IDEM, the state's stormwater management was original overseen by the of the Department of Natural Resources (DNR). Prior to integration, these programs were collectively processing approximately 2,500 permits per year, each operating with a staff of seven to manage all permitting, monitoring and enforcement efforts. In 2010 Water Director Martha Clark Mettler, along with the support of IDEM and DNR senior management, recognized that integrating these programs would increase efficiency and effectiveness.

Following an initial planning period, the first phase of integration was launched in 2012, transitioning both programs into one section at IDEM. Structural changes were made to the reporting hierarchy and the physical office layout. Merging of the programs also saw internal procedures and permitting processes strategically combined where applicable to streamline resource management and reduce procedural redundancies. All communications, inspections, and monitoring reports were collected through a new online portal and managed in a single database increasing access to information and

expediting workflow. Staff received cross training, allowing them to support the overarching work of the program while continuing to operate as experts in their individual specialties.

The most recent integration efforts have focused on the increased use of technology to enhance the program's work. IDEM has invested \$400,000 in the development of a new database to manage construction permitting and is moving to a new electronic permitting system. If this new system is successful a similar digital process will be established for wetlands permitting as well. As applicants must currently access separate wetland and stormwater permitting documents this integrated digital system, which will utilize SmartForms has the potential to streamline the permittee experience and expedite the permitting process. In the long-run, the agency hopes to create a single digital system that stores all of this information, as well as a searchable database of issued permits and violations by applicant name.

Resource Investment

IDEM's move towards an integrated permitting program has been an organic, gradual process with little capital cost involved beyond the initial expense of relocating people, extensive filing systems (containing hard copy permits, NOIs and other documents) and equipment. Much of the staff cross-training was conducted in-house, drawing upon the "train the trainer" method. However, some specialists did receive job-specific training depending on their role and expertise. Additional marginal costs included updating program documents and website to reflect the new section name. The most significant resource investment has gone towards technology improvements, including \$400,000 to develop an electronic database and online portal for all construction based permitting. If this system is successful IDEM will pursue development of a similar system for wetland permitting. A final, though critical element was restructuring all communications to integrate under the new section.

How Success Has Been Measured

IDEM's Wetland Program has identified the following output and outcome metrics to gauge their success:

Integration Outputs:

- Development of a new shared permitting process
- Agency staff from both permitting programs relocated into one physical locations
- Development of a new joint permitting entity under one section
- Development of shared inspection tasks
- Regular cross-training activities

Integration Outcomes:

- **Faster, Unified Permit Processing:** Prior to integration stormwater and wetland permitting were two separate processes operated by two different organizations. With most applicants requiring both permits the old process could take nearly a month to complete. Following integration applicants navigate a single, streamlined and updated process which now takes an average of

twelve days to complete a combined permitting request. This is helping work towards the agency's new directive to reduce processing time down to seven days.

- **Increased Inspection & Compliance:** An important aspect of integration was the cross-training of program staff. This doubles the number of inspectors, allowing for more frequent and thorough inspections. With increased "eyes on the road" both permitting staff groups have been able to increase their capacity and use their time more efficiently.
- **Increased Compliance:** More frequent and thorough inspections has resulted in violations coming into compliance faster.
- **Collaborative Problem-Solving:** The agency staff now work jointly to address issues like violations where an individual destroyed a headwater stream, conducted activities that contributed to sediment pollution, or did not apply for a permit.
- **More Consistency:** Previously with two separate permitting processes applicants would complain that they were receiving, sometimes differing, information from representatives at each agency. After integration all project managers are aligned around the same goals and unified by a single process allowing them to respond more effectively to applications, violations and other arising issues. Additionally, a more cohesive unit reduces the opportunity for applicants to play permitting program staff against each other.
- **Fewer Complaints:** Since integration agency staff have reduced the response time for addressing complaints from a couple of months to just a few weeks. Everyone has access to the complaint database allowing them to document issues as they arise, request specialist assistance if needed, and monitor progress towards resolution.
- **Applicant Satisfaction:** Although satisfaction surveys have not been sent to permittees at this time, qualitative and anecdotal reports indicate applicants are pleased with the new system.
- **Consultant Satisfaction:** Consultants have also provided the agency with positive feedback on the new service. They appreciate the simplicity of dealing with a single agency, for example receiving one unified list of violations to take to the client.

Impact on Watershed-level Planning, Implementation or Outcomes

While the IDEM's integrated Wetlands program has a statewide purview, it does not incorporate a watershed perspective in its work. While the IDEM has seen many advantageous outcomes from its integration effort, it is important to note that integration and watershed level planning are not necessarily synonymous.

Cost Benefit Insights

While a formal cost-benefit analysis has not been conducted for IDEM's program integration, an informal assessment identified several opportunities for potential cost savings. First, while there hasn't been a reduction of staff or equipment required, there is now a single manager responsible for the merged programs. Secondly, intentional cross-training of staff to conduct both wetland and stormwater inspections has increased the program's ability to quickly identify violations. This expanded inspection capacity, combined with more efficient internal processes has resulted in violations coming into

compliance faster. Furthermore, conducting joint inhouse trainings drawing upon the diverse expertise of the program's staff has likely reduced training expenses.

Other Impacts

Navigating wetland and stormwater regulations can present challenges for the regulated community throughout the permitting, monitoring and enforcement process. Prior to integration when an issue arose, or a permittee had a question they would potentially have to go through processes within both programs in order to reach a final resolution. With the current integrated system issues regarding wetland and stormwater regulations can be handled by a single staff person reducing response times by eliminating redundancies and streamlining processes.

Information about Policy-related Issues

No legislative changes were required to implement this integration effort. However, the Commissioner's approval was an important factor in moving forward as was the buy-in of department staff and leadership at both the IDEM and DNR.

Challenges & Lessons Learned

As a top-down directive, staff buy-in was an essential component to the success of this integration effort. Initial staff concerns included changes to individual responsibilities and performance metrics, as well as a fear that their positions would be eliminated altogether. Clear communication from senior leadership helped to support the staff through this transition. Additionally, it was conveyed to staff from the start that their positions would remain fundamentally the same and staff would continue to focus on their specialty. The transition was framed around the goal of being able to provide better protection of human health and the environment, something most agency personnel agreed about. There were concerns from some staff that their work was going to be spread out to other people and that rules would change. The transition was easier for newer staff than those who had been in their positions for longer periods of time.

Next Steps

As initial integration of staff and internal processes is completed, the focus has shifted towards increasing the use of technology to support the staff and the regulated community. There have been many technological developments in recent years that can enhance the program's efficiency and effectiveness. For example, IDEM's investment in developing integrated electronic databases for each of the programs and creating a "one stop" online portal for all permitting activity will help to streamline the permittee experience and expedite the permitting process. The online portal will also incorporate electronic SmartForms that prompt you for more information based on your answers, allow monitoring reports to be digitally submitted online, and sync with integrated databases for efficient and accurate data entry and reporting.

IDEM is also in the process of implementing an integrated inspection priority system that incorporates topographical maps, soil types, rain reports, and other essential information. This digital system will identify locations with the highest probability of issues, creating a score to prioritize inspection sites based on construction site size and 303(d) impaired waters data. It will also generate a map with the most efficient route for conducting multiple inspections in a single outing. IDEM anticipates this new program will be ready for staff to use by April 1st, 2019.

Additionally, the Wetlands program is interested in increasing staff training around green infrastructure and identifying opportunities to incorporate this information into their regulatory work in partnership with planners.

Transferability

The integration effort undertaken by IDEM is highly transferable to wetland and stormwater programs in states looking to streamline their permitting, monitoring and enforcement efforts and improve support for the regulated community. An important component of IDEM's success was the parallel strength of both their Wetland and Stormwater programs prior to integration in terms of experience, expertise and management. States hoping to replicate Indiana's program should evaluate each department thoroughly before initiating integration in order to identify potential issues.

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Additional Resources

- [Indiana Department of Environmental Management](#)
- IDEM will have new online resources available in April 2019
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