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AQUIFER PROTECTION SECTION PERMITTING SURVEY RESULTS

Number of responses requested: 125
Number of surveys completed: 35
Participation rate: 28%

Question #1: Please rate your experience with the following items as related to the APS Express Review Program:

	Poor	Average	Good	Excellent	Rating Average	Response Count
Clear application requirements	5.9% (2)	29.4% (10)	**38.2% (13)**	26.5% (9)	2.85	34
Communication with reviewer(s)	5.9% (2)	8.8% (3)	29.4% (10)	**55.9% (19)**	3.35	34
Thoroughness of review	0.0% (0)	8.8% (3)	**55.9% (19)**	35.3% (12)	3.26	34
Technical knowledge/professionalism of reviewer(s)	2.9% (1)	20.6% (7)	**38.2% (13)**	**38.2% (13)**	3.12	34
Clear/correct permit product	5.9% (2)	23.5% (8)	**47.1% (16)**	23.5% (8)	2.88	34
Questions answered accurately/quickly	8.8% (3)	8.8% (3)	**44.1% (15)**	38.2% (13)	3.12	34
Review process completed in reasonable timeframe	2.9% (1)	11.8% (4)	35.3% (12)	**50.0% (17)**	3.32	34

Question #2: Please rate your experience with the following items as related to the APS Standard Review Program:

	Poor	Average	Good	Excellent	Rating Average	Response Count
Clear application requirements	12.1% (4)	21.2% (7)	**54.5% (18)**	12.1% (4)	2.67	33
Communication with reviewer(s)	8.8% (3)	29.4% (10)	**47.1% (16)**	14.7% (5)	2.68	34
Thoroughness of review	3.0% (1)	24.2% (8)	**60.6% (20)**	12.1% (4)	2.82	33
Technical knowledge/professionalism of reviewer(s)	9.1% (3)	33.3% (11)	**36.4% (12)**	21.2% (7)	2.70	33
Clear/correct permit product	6.1% (2)	36.4% (12)	**39.4% (13)**	18.2% (6)	2.70	33
Questions answered accurately/quickly	15.2% (5)	**48.5% (16)**	18.2% (6)	18.2% (6)	2.39	33
Review process completed in reasonable timeframe	27.3% (9)	**39.4% (13)**	24.2% (8)	9.1% (3)	2.15	33

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Question #3: Have you experienced any differences in application requirements, design standards, or rule interpretations between the APS Express Review Program and the Standard Review process? If so, please explain.

1. The only comment I can offer is that when the permit processing occurs in an expedient manner, all persons involved are much better aware of the actions required. I particularly like the schedule of meetings within the time frame of a permit review.
2. Sometimes there are differences in what one reviewer prefers vs. a second reviewer. Therefore, what works on one permit, sometimes doesn't work on a similar permit.
3. No.
4. None.
5. No.
6. No.
7. The difference is in the personnel. Express review personnel demonstrate professionalism interest in project and good communication. None of the above apply in the standard review process.
8. Property line buffer interpretation, requirement for compliance/review boundary maps have all been different for Express Review than a regular modification.
9. The review process is thorough; the new uses proposed for reclaimed water will open many new opportunities, that process will tell whether there is commitment to reuse!!!
10. No real big differences; however, I believe the Standard process does not promote as thorough a submittal as the Express process. Also, the promotion of communication in the Express process, I think, provides for the ability of the reviewers to more fully explore the project with the applicants.
11. No.
12. I honestly haven't done a standard review since express has become available.
13. None.
14. Most of my experience has been with the express review process. That state would be well advised to eliminate the standard review process and do only express reviews. That program should be a model for every permit process the state operates.
15. Yes, seems that rules are interpreted differently in a variety of cases between similar projects.
16. There are not much differences between processes except for time and efficiencies. The express review process is conducted in a more professional manner.
17. Some reviewers are better than others, but I don't think it has to do with interpretation or standards. I think it is just experience. Overall they are all pleasant to work with.
18. By nature of the process the express review professionals are quick and consistent with responses. In the standard review process, it may depend on who the reviewer is.
19. The process seems about the same, but generally speaking the express review process seems like the applicant has more of the reviewers attention and thus focus.
20. Yes, but I cannot explain for fear of reprisal. I was told this is an anonymous survey, but I do not believe everything I read.
21. Yes, some reviewers have differing interpretations, and some have arbitrary standards that they impose. There seems to be a huge disconnect between what's on paper and what gets built, practically, and certain technologies are favored because the reviewers don't understand treatment basics.
22. Not really but the compressed Express Review Program requires that questions be answered quickly. There shouldn't be a lag between return calls because if the information is not prepared as needed it means that the provided documents may be incomplete and therefore requires another review session to straighten out. With the review session there is a cost.
23. No.
24. No.

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Question #4: Please rank the following items below in order of importance to you when submitting a permit application for review (1=most important and 4=least important):

	1	2	3	4	Rating Average	Response Count
Quick response from reviewer(s)	**43.8% (14)**	25.0% (8)	15.6% (5)	15.6% (5)	2.03	32
Face to face meetings with reviewer(s)	21.9% (7)	18.8% (6)	25.0% (8)	**34.4% (11)**	2.72	32
Technical knowledge of reviewer(s)	27.6% (8)	**31.0% (9)**	24.1% (7)	17.2% (5)	2.31	29
Thoroughness of review	12.9% (4)	**29.0% (9)**	**29.0% (9)**	**29.0% (9)**	2.74	31

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Question #5: Besides the expedited review times, in your opinion, what works well in the APS Express Review program?

1. It appears that the staff of the APS Express Review program are well trained and educated. Their knowledge of the various treatment processes is extremely important.
2. Having the face to face meeting in order to present the design and application. I would like this meeting for all applications.
3. Set schedule so you know when to expect deadlines, etc.
4. Being able to schedule the times in advance.
5. The upfront meetings and review meetings face to face are great. In number 4 above I ranked face to face low because not needed in standard review.
6. The communication stream is better, because the project remains fresh. Need to bring in regional input and surface water, eg. wetlands and water quality into the express program.
7. Good interaction between applicant and staff in discussing and resolving technical issues.
8. The interest and professionalism demonstrated by most of the reviewers.
9. The only benefit is a quick turn around time.
10. The review is very thorough and complete, the design team is forced to be thorough.
11. Open discussion of what is needed.
12. Much, much better communication and more thorough exploration of the project. I truly believe the Express process promotes more successful permitting.
13. Having the ability to explain in person the nature of your project and offer a more detailed narrative and background information.
14. The face to face meetings in which an issue can be discussed and understood instead of a letter that quite often cannot be interpreted.
15. I think the face to face meetings are good to have all parties present.
16. Knowledgeable professionals, working with other engineers, predictability of the process in terms of time and expectations.
17. I like the meeting to discuss the project, I feel like it gives the reviewer a better background on the project than just dropping off package and letting someone review it.
18. Conciseness of express review promotes better reviews and projects, since facts and concerns are not lost through time. This greatly reduces costs and promotes efficiency for both the applicant and your dept.
19. Scheduled review times, face-to-face meetings, and only having to work with one DWQ person rather than several.
20. The engineers are fair, consistent, responsive, professional, honest and they take ownership in the project.
21. Generally have a higher degree of professionalism among APS staff.
22. Transparency/communication, fairly good technical knowledge.
23. Process seems to be very well defined. Review engineers are very well qualified and extremely helpful.
24. Typically dealing with the same reviewers and have consistency with regs and requirements.
25. Milestones help everyone stay on track.
26. 1-on-1 meetings with all review parties.
27. Resolving issues more quickly and successfully.
28. Consistent review responses.
29. Submittal meeting gives opportunity to eliminate questions at the start of the process and sets the review up for success.

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Question #6: What suggestions do you have for improvement of the APS Express Review Program?

1. None, all of my experiences with the APS program have been very productive and helpful.
2. I think it is a great program that is limited by the cost. I would hope the cost could be reduced or eliminated so that more permits could follow this procedure.
3. Less paper required, more electronic submittal.
4. Break it up into sections. Example is to review the site data, (soil evaluations, testing, etc), then review the design info later.
5. Have more windows if justified by staff needs.
6. Add a fee to support staff at regional level to support APS Express Review.
7. Try to avoid triggering an additional round of review and payment of an additional fee when there are relatively limited and minor outstanding issues.
8. Works relatively well.
9. More consistency with what is required for a regular permit application/modification.
10. None, again, the new uses will be interesting.
11. Nothing that I would change.
12. Involvement of the local office staff during the submittal meeting.
13. None.
14. I have only used it two or three times and had good experience each time.
15. Have the meetings at the regional office locations that cover the area that the project is actually located in vs. everyone traveling to Raleigh.
16. Expand it to all state permitting.
17. I would like to see the regional staff incorporated into the program, seems to be some animosity from regional staff on all express review projects.
18. The regulatory guidance memos are enforced as if they were rules, but have not gone through rule making. The standards in the regulatory guidance memos are generally arbitrary, vague and overly restrictive. The guidance should go through rule making or be eliminated.
19. Stay strictly within the stated Rules and not add requirements or concerns that are not specifically within the stated Rule. Express review process does not allow for additional major studies or revisions to be conducted when the dept adds requirements outside of the stated Rule.
20. Lower fees for single family permit. Expand the program, it should be a model for the whole Department(DENR).
21. Too many details being "sweated". Reviewers need to recognize that engineering can provide more than one sound solution - give the PEs discretion.
22. Even though it would be difficult to do, I would like to see more "outside the box" options. Not as rigid.
23. Allow flexibility for innovation. Recognize the professionalism of the design engineer.
24. Continue to keep updates and any changes publicized on the website and/or through e-mails.
25. It is a buyer beware program. You need to know the requirements of a submittal before you sign up. If you do not know what is expected you should not be surprised that it requires a lot more time or money to secure a permit. I suspect that a list needs to be made available to potential permitees of companies that have been involved in this prior so that they will know the ones that are familiar with the process. Then if they elect to have someone that is not familiar it's their own fault. May need to have a checklist of analytical before they apply.
26. None.
27. Remove involvement of Surface Water Protection in non-discharge projects.
28. Better integrate regional office.
29. For the large fee required, one add-info round should be included unless something is clearly wrong or incomplete. I realize that calls for judgment, which can be problematic, too.

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Question #7: In your opinion, what works well in the APS Standard Review process?

1. Personnel involvement with a reviewer who has limited work load.
2. That the fees are reasonable.
3. Communication with APS staff, technical proficiency of APS staff.
4. The scheduleing is important, the standard review give everyone more time to plan.
5. Getting all the "stakeholders" together at time of submittal.
6. Cook book sewer permits are usually issued quickly.
7. The inputs of regional input and surface water staff has better flow.
8. Not much.
9. Less requirements than that Express Review. Regional staff seem to be more flexible and easier to work with. Central office staff seem to not grasp real world realities.
10. Time.
11. The current staff have good technical depth and diversity. Also, the permit application instructions are clear and descriptive.
12. It's not much different that any review process for environmental programs in the state, so nothing really stands out.
13. Really don't know, i personally haven't had many projects that go thru aps except for the few express projects that i have done.
14. Nothing! To a developer, time is all that matters.
15. The more local folks are involved and look at things from a different view, think it makes the process a more thorough review, another set of eyes on it so to speak.
16. Lower application fees and more time to answer dept concerns. Not as many trips to Raleigh for permit processing.
17. It costs less.
18. It is much better than some groups (On-Site Water Protection Section)!
19. No constructive comment.
20. The regional offices are very prompt and make a good effort to understand the want the applicant is asking for.
21. Guidelines seem more clear. Reviewers do a better job on the first round of comments.
22. Rules and applications are very well structured and help the applicants with knowing what is needed in an application.
23. Standard review is fine but sometimes it needs standardization between reviewers.
24. The reviews tend to be very thorough.
25. Consistent responses.

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Question #8: What suggested improvements do you have for the APS Standard Review process?

1. None.
2. Require at least one review meeting initially with the reviewer to present the project and review the application. Hopefully this would speed up the review under the Standard process.
3. Less paper.
4. None at this time.
5. More clarity for applicant on downstream capacity requirements. This takes us the longest to get back from applicant municipality.
6. Have structured meetings and schedules, just at longer periods.
7. Inform reviewers that they should correspond with submitters of application and not "wait until 90 day time limit" to respond with information.
8. Quicker turn around time.
9. Additional staff.
10. Require a submittal meeting.
11. None.
12. My past experience would be to encourage face to face meetings and to be available by phone. It has, in the past, been difficult to get return calls from staffers but this has not been a recent experience for me.
13. Eliminate it! Do all reviews as express save the citizens of NC a lot of time and money. What they don't spend on fees they end up spending on professional serves because the process is so long and drawn out.
14. Would like to incorporate a kick off meeting so that all parties could discuss project.
15. The regulatory guidance memos are enforced as if they were rules, but have not gone through rule making. The standards in the regulatory guidance memos are generally arbitrary, vague and overly restrictive. The guidance should go through rule making or be eliminated.
16. Emulate the express review process as much as possible through streamlining the standard review process. Also, stay strictly within the stated Rules and not add requirements or concerns that are not specifically within the stated Rule.
17. Better communication, why does it take so long?
18. Consistency among reviewers. Be more timely.
19. Work with clients as opposed to against clients.
20. Permits are not consistent from one to another. Some permits will state and/or require one thing and then other permits of the same type (i.e. class A) state something different or not at all. If feel disconnected from the central office reviewers.
21. Improve communications, call back with questions rather than make empty comments about things that are already addressed or don't matter.
22. More timely review process. Continue to keep the public informed of common deficiencies in applications and any new or changing requirements.
23. As changes are noted and additional requirements deemed necessary, a means of communicating them to permittees and consultants would be helpful. It is difficult to hit a moving target.
24. Make the first response a face-to-face meeting between designer and reviewer.
25. Regional office, better/more comprehensive guidance documents.

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Question #9: Other than the review schedules, have you experienced any other differences (not covered in the previous questions) between the APS Express Review Program and the Standard Review process?

1. Time, Time, Time.
2. The face to face meetings in the express review. I think these are good and would like some meetings for the Standard Review.
3. No differences between the two, except the fees, express review is more expensive
4. CG&L is more difficult to get consistent and timely reviews when they are involved.
5. There needs to be follow-up after permitting....such as formal inspection and testing to insure compliance and function.
6. None that haven't already been covered.
7. None.
8. Because there is less time pressure, I believe that sometimes there is a little more effort spent on the technical review during the "standard" process. But there is less ability to convey the nuances of the specific project during standard review, because the face-to-face discussions are not as "forced" like they are in the expedited process. It's a balancing act.
9. I think it is the face to face meetings that get the job done and any necessary revisions to be done once with all parties understanding the final need.
10. It been so long since I did a standard review submittal, I really don't remember anything except the time factor which is ridiculous.
11. No.
12. The Express review group could not be operated any more efficiently. They are great to work with. The Standard Group does a good job when compared with other groups within DENR. Responsiveness, ownership, and consistency could improve a little.
13. Inexperienced staff leads to delays in obtaining permits.
14. Express reviewers seem to want to dictate the design, and make "suggestions" that are really not requirements, but they want things done their way.
15. Not particularly.
16. No.
17. No.

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Question #10: Please provide any other comments or concerns that you have regarding the APS Express Review Program and/or the APS Standard Review process.

1. I would strongly suggest that the APS Express Review Program be used as a template for other DQW permitting programs.
2. No.
3. No major concerns at this time.
4. Doesnt make a lot of sense to have fast track for up to a 1750 gpm pump station and miles of force main and have to go through full blown review for two or three 1 hp grinder pumps manifolded together in a 2-inch main.
5. While the development of policies, has provided guidance for tasks performed during consultants' analysis. A policy(s) relating to construction, inspection and operation could be helpful.
6. I think express review is one of the most positive initiatives of the Division in the past decade.
7. None.
8. This is an excellent opportunity, it should be incorporated into all permit processes.
9. All this being said, I believe the APS Review programs are among the best in our state.
10. I would suggest there be clearer and more readily available guidance on which permits are required and when they are required.
11. I think the express program is the preferred way of doing business and this same tactic could be utilized in the standard review. With a lot of the negative publicty about the express program i am concerned that it may not be available in the future but it is a very important tool to have projects expedited.
12. When I hear that the state in considering eliminating the express review I shudder.
13. Staff should strictly follow the stated Rules, and not require criteria or personal / dept concerns beyond the stated Rule. (eg. storage requirements; loading rates; nutrient loading rates; artificial limits through mandatroy DWQ spreadsheets or formats; etc). Also, there is a desperate need to get the Rules right when written, rather instituting multiple internal department guidance policies (eg. 2T Rules; reclaim Rules; subsequent confusing dept guidance policies; etc). Would strongly suggest inviting professional practicioners to the table when writing new or revised Rules / dept policies. Overall, your section is of much higher professional quality and in processing applications than other NCDENR permitting programs. Time is money, & money is time.
14. Keep up the good work! One of the best run groups in DENR.
15. Standard Review process needs to step up to the current level of Express review; Express Review needs to step up to a higher level.
16. Again, I am not willing to speak much, for fear of reprisal for me and/or my firm.
17. Conservatism is good up to a point, but there are too many safety factors. Study the systems that have a history of operation and adjust the design criteria to suit the actual performance. Respect the integrity and knowledge of the Professionally Registered Engineer, and if their design fails, fine the owners and refer the Engineer to the Board.
18. Both work pretty well.