

# City of Fort Worth

## Environmental Management Division


*Interdepartmental Cooperation to Identify Planned Construction Activity within a MS4*




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## Discussion / Overview

1. A brief discussion on Texas Pollutant Discharge Elimination System (TPDES) Construction General Permit (CGP) requirements for construction sites.
  2. Rapid Growth of the city created development and compliance challenges
  3. Explain City of Fort Worth methodology for permitting of new construction sites for grading/fill ordinance requirements.
  4. Discuss methods for interdepartmental cooperation to address challenges.
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- The Texas Pollutant Discharge Elimination System (TPDES) Construction General Permit (CGP) is issued by the Texas Commission on Environmental Quality (TCEQ).
  - It establishes regulations for the minimization of stormwater pollution from constructions sites.
  - Both small construction sites (disturbing 1 or more but less than 5 acres) and large construction sites (5 and more acres) must be permitted by the (TCEQ) & includes Larger Common Plans of Development or Sale (LCPDS).
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- These sites are also required by the City of Fort Worth (CFW) to obtain the appropriate separate (CFW) grading and or fill permit.

~~Problems~~

Solutions



## What is the Challenge of Compliance and Construction?

- CFW has been and continues to expand its land base with annexations (city is growing in land mass) over the last 20 years
  - CFW has been and continues to have rapid infrastructure development and growth in commercial, residential, and industrial applications
  - Population is approximately 833,319 / Population growth of 42.34% increase from 2000 – 2013<sup>1</sup>/Area of 353 Sq Miles
  - CFW needed better control of development and rapid growth in the city
  - Grading and fill operations needed better oversight to comply with our Storm Water Management Plan (SWMP) and the TPDES obligations as a result of the growth
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### An Approach for Improvement & Compliance:


- On August 1<sup>st</sup> 2012 the city first approved an ordinance to require all soil disturbing sites including grading or filling of ½ acre or more of soil disturbance to apply for a separate, city-issued grading and or fill permit.
  - On 10/15/2015 the City of Fort Worth amended its ordinance for soil disturbing sites including grading or filling to a one (1) acre or larger threshold.
  - This is the same threshold as the state storm water permit (CGP), so the city ordinance now works congruently with the state.
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## Paper work For Approval





- An application is submitted to the Planning & Development Department by the developer / operator for intake and processing.
  - Applications are made either in person or electronic submission
  - There is a \$ 50.00 administration fee
  - 259 permits were issued in 2015
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There are two types of grading permits issued:

- Early grading; earthwork only, no infrastructure or building construction allowed (early development).
  - Final grading (full commercial); the ‘go vertical’ grading permit (complete development).
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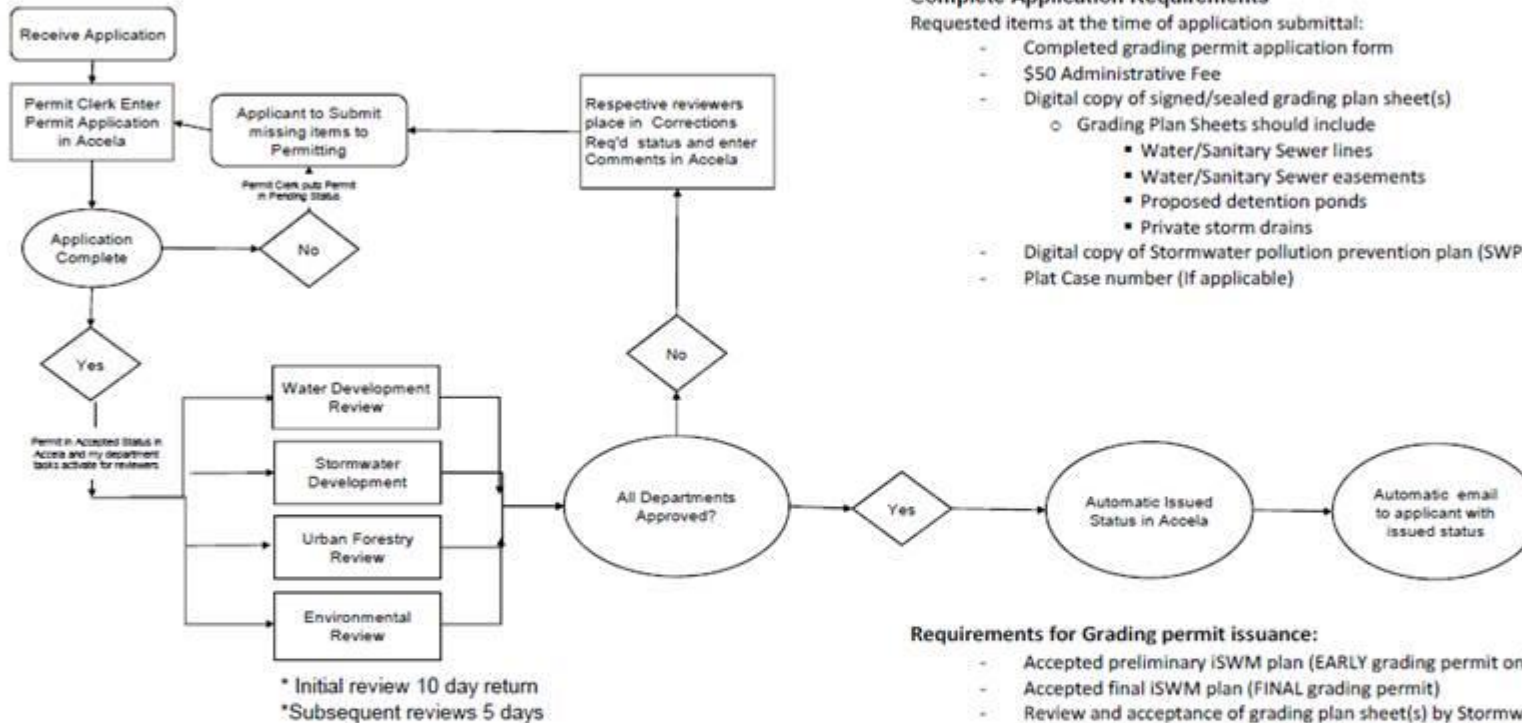


- Once the application is received by the Planning & Development Department it is forwarded onto Water Utilities, Transportation & Public Works (TPW) Storm water / Floodplain Management, Urban Forestry and Code Compliance / Environmental Management for review.
  - Components are integrated through engineering criteria and standard specifications, and staff across departments remains aware of projects.
  - Each group reviews the application for the appropriate documentation required for its approval. This allows for interdepartmental cooperation and collaboration between departments.
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- If documentation is missing or inaccurate a status “Hold or Corrections Required” will be placed in the database and a request is made to the operator for updated records. This status will remain in the system until all required documentation is received.
  - The grading and or fill permit will not be issued by the Development Department until all 4 groups has made their approvals.
  - This effort has helped to ensure that all required reviews are completed before the permit is issued which increases city, state and federal compliance and better managed growth.
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- Environmental review and approval requires submission of:
    - A Storm water Pollution Prevention Plan (SWP3)
    - Notice of Intent (NOI) or
    - Small Construction Site Notice (SCSN) (as required) including signatures
    - Grading and erosion control plans and the Best Management Practice (BMP) map etc.
  - The process allows for early review of (TPDES) permit requirements before the project starts soil disturbance. This increases completeness and accuracy with the (TPDES) permit and improves storm water compliance by the operator.
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# CITY OF FORT WORTH GRADING PERMIT PROCESS



## Complete Application Requirements

Requested items at the time of application submittal:


- Completed grading permit application form
- \$50 Administrative Fee
- Digital copy of signed/sealed grading plan sheet(s)
  - o Grading Plan Sheets should include
    - Water/Sanitary Sewer lines
    - Water/Sanitary Sewer easements
    - Proposed detention ponds
    - Private storm drains
- Digital copy of Stormwater pollution prevention plan (SWPPP)
- Plat Case number (If applicable)

## Requirements for Grading permit issuance:

- Accepted preliminary iSWM plan (EARLY grading permit only)
- Accepted final iSWM plan (FINAL grading permit)
- Review and acceptance of grading plan sheet(s) by Stormwater Development Services
- Review and acceptance of SWPPP by Environmental Department
- Must be approved through Part One of the Urban Forestry permit
- Review and acceptance Grading plan sheets by Water Development
- Approved Floodplain Development Permit by Floodplain Management (Where applicable)

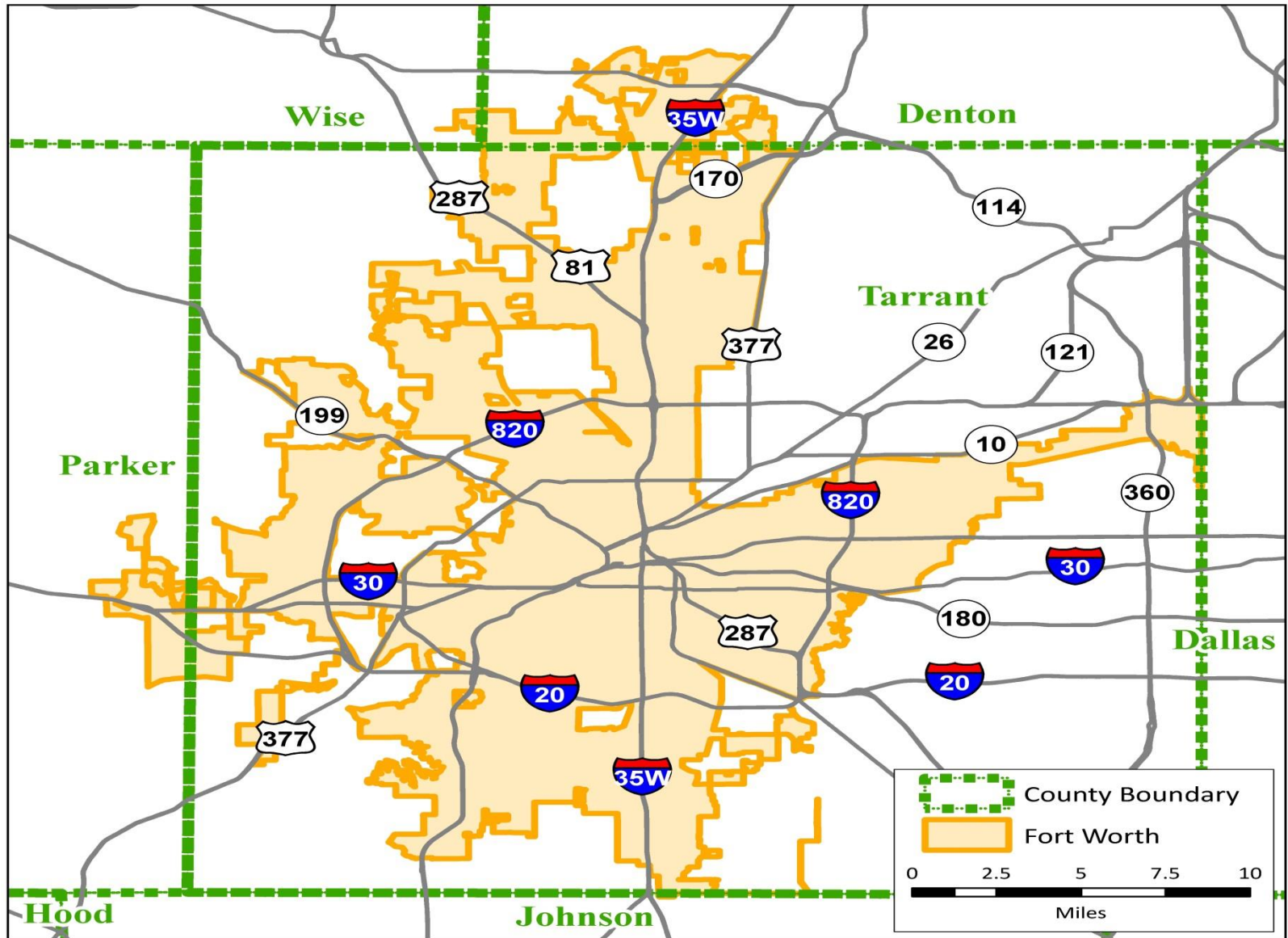




- Fort Worth is the 16<sup>th</sup> largest city in the nation
  - Ranging 4 counties
  - Interdepartmental collaboration is crucial to enhance resources
  - Multidiscipline inspectors (water, streets, parks, code, environmental etc.,) work together to identify sites that are noncompliant
  - Environmental Construction Inspectors & Code Enforcement Illegal Dumping Officers work together to identify unpermitted fill and grading operations
  - Often these sites may be small and in areas of town that are not highly visible or populated.
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- Individually, these projects may seem insignificant by themselves but collectively are significant.
- Identification of unpermitted fill and grading sites is crucial in achieving the city's development and environmental "vision"
- Our vision "Fort Worth will be the most livable and best managed city in the country."







Fill and grading sites may be obscure or environmentally-sensitive (i.e., located along streams or drainage channels), so identification is important to ensure proper management, drainage, safety and MS4 compliance.







Conclusion:

The process of requiring grading/fill permits has been a bridge between many departments, each with its own needs and requirements.

Interdepartmental review fosters cooperation and leads to better regulatory compliance and customer service in Fort Worth.

Regulating and controlling the process of grading and filling of parcels of land is a key step to managing a city's MS4.

**But wait there is MORE!!!**

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NO  
SMOKING  
NOTICE  
KEEP GATE  
CLOSED

FIRE LANE NO PARKING

FIRE LANE NO PARKING









## Acknowledgements:


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Marty Hott & Casey Nettles for suppling Photos

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## References:

<sup>1</sup> Refer to Korri Kezar Dec 4, 2014 Dallas Business Journal <http://www.bizjournals.com/dallas/news/2014/12/04/fort-worth-has-highest-population-growth-in-u-s.html>



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Thank you and Questions?