

17 March 2017

County of Santa Barbara Board of Supervisors
Clerk of the Board
105 East Anapamu Street, Room 407
Santa Barbara, CA 93101

Subject: **Proposed Changes To Building and Planning Fees**
Item 1 - Board of Supervisors Hearing March 21, 2017



Chair Adam and Supervisors:

We respectfully submit the following comments for your consideration as you review proposed changes to the fees charged for Planning and Development building and planning services. Suzanne Elledge Planning & Permitting, Inc. (SEPPS) has over 20 years of experience processing a wide variety of planning and building applications. We have extensive experience representing projects in the County, and a keen interest in the permit review process.

We understand that Planning and Development has been tasked with eliminating reliance on a "subsidy" from the General Fund for permit processing and development review. We are also aware of the serious budget decisions facing the County. However, the proposed changes to fees, deposits, and hourly billing rates are substantial enough to warrant comment.

If any of Planning and Development's services are going to be "subsidized" by the General Fund, shouldn't we subsidize the services that positively impact our local economy?

We note that funding for Long Range Planning projects would continue to include funding from the General Fund (among other sources including a General Plan surcharge on certain permits and grants). We also note the inefficiencies of certain multi-year Long Range Planning projects such as the special event and winery ordinances which were tabled and never adopted after significant resources were expended. The Board should consider whether certain Long Range Planning projects that are driven by a relatively narrow constituency are more deserving of a subsidy than permit processing and development review which result in social, cultural, or economic benefits that ripple through our local economy (e.g. affordable housing, non-profit institutions, projects that generate short and long term jobs, and increased property taxes, etc.).

Why increase both deposits and hourly rates?

We question why submittal deposits are proposed to increase. Applicants are invoiced monthly for staff time throughout processing and are readily given notice that processing will cease if invoices are unpaid. Deposits are applied to the final invoice. The source of revenue is the payment of monthly invoices making us question the need to increase the initial deposit. Perhaps consider increasing deposits for complex discretionary projects or others that require extensive analysis or environmental review.

Could increases be strategically applied to minimize costs for innocuous or beneficial projects?

Our firm works with a variety of clients; from small "mom and pops" to experienced developers. Certainly, some are able to absorb fee increases more easily than others. The Board should consider the impact on those merely seeking to improve their residence or create a new dwelling unit versus those developing complex or challenging projects. In other words, consider the unique needs of our community and build a fee schedule that minimizes costs for innocuous or beneficial projects. Also, consider whether increased fees may drive small scale projects "underground" creating potential health and safety concerns or resulting in a need for increased enforcement. Finally, the proposed increase for a Planner Consultation from a \$343.00 fee to a \$1,000.00 deposit with potential for additional charges will likely deter applicants from seeking valuable guidance before pursuing a project application submittal. Couldn't this fee be graduated to reflect the relative simplicity or complexity of the project?

Increases bring heightened expectations.

Finally, we believe that increased billing rates and fees should result in a tangible improvement to process. Will more Planning staff be hired? Will application processing timelines be improved? Can applicants expect an increased level of service and diligence commensurate with the increases?

We appreciate your consideration of our comments which we submit having a long-standing respect for the entitlement process and staff that manages the process.

Sincerely,
SUZANNE ELLEDGE
PLANNING & PERMITTING SERVICES, INC.


Steven M. Fort, AICP
Senior Planner