

County of Santa Cruz

PLANNING DEPARTMENT

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RESPONSES TO PUBLIC COMMENTS RECEIVED AT WINTER 2010/2011 COMMUNITY FORUMS AND FOCUS GROUPS

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From November 2010 to February 2011, the Planning Department conducted several Community Forums and Focus Groups throughout the unincorporated area in order to provide an overview of the functions and services provided by the Department; and to obtain public comments and input about any aspect of those services. All comments were recorded at the meetings, and compiled into a written document that was made available to the Planning Commission, to county staff involved with development review in various departments, to those who attended the meetings, and to the public.

Over the past two years since the meetings were held, the Planning Department has used these comments, as well as others gathered through various public participation processes, to guide the priorities and content of proposed regulatory changes. This document organizes the public comments that were received into categories, and then provides responses to each of the comments. In many cases, much progress has been made by the County to change regulations or practices in a manner that is responsive to the comments. Some of this work is completed, while other work is still in progress. Some comments addressed topics that were not "regulatory" in nature, but related to customer service, inter-departmental coordination, and other aspects of the development review process. These are also very important comments, which have been listened to and used to guide changes in practices.

The County Board of Supervisors has been supportive of Department efforts and proposals to modernize, streamline, and better serve our permit customers; in a manner that continues to respect community values of environmental preservation, and protection of neighborhood and community character. It is our hope that property owners who wish to improve their properties, expand or locate businesses, or otherwise interact with the County Planning Department and other county land use regulatory agencies, will review this document and be encouraged at the direction the County is going. We invite you to visit the Zoning and Building County on the 4th Floor of the County Building to explore how we can assist you in meeting your development objectives in a manner consistent with applicable regulations. If in the past you decided not to pursue improvements due to uncertainty, risk or regulatory obstacles that seemed outdated or too complex; or due to interpretations of the Code that appeared to create more difficulty than you believed should be the case, please consider re-engaging and exploring what the recent changes in regulations and practices might mean for your project.

We thank all of the members who took the time to attend the community forums, the focus groups and the many other public participation opportunities related to specific code amendments over the past two years. We work for and represent your interests, and hope that you continue to remain involved as further changes to the land use codes and regulatory processes are considered, so that the County Code is not only consistent with State and other laws, but also reflects community perspectives and values.

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Comments and Responses have been organized into the following categories:

- ➤ Regulatory Reform & Modernization: Code Clarifications or Amendments
- ➤ Regulatory Reform: Permit Review Process and Customer Service
- > Fees and Costs
- ➤ Code Compliance; Construction Legalization and "Amnesty"
- Miscellaneous

Regulatory Reform & Modernization: Code Clarifications or Amendments

Consider revising the Altered Wall regulations to use a valuation method (similar to floodplain valuation method) or other approach. Vet the proposed revision before adoption with architects and industry professionals.

Code amendments related to "altered walls" have been approved and are in effect. After consideration of various alternatives to the existing "altered wall" method of identifying the threshold for applicability of various code requirements (including discussion with various Focus Groups), a method based on "reconstruction"; defined to mean replacement of 65% of the major structural components of a building – the structural framing of the floor, walls and roof of the whole structure - is the new threshold for determining the applicability of various code requirements. The focus on whether 50% of one wall is being altered in any way has changed to a "whole structure" approach, such that various permit thresholds or requirements are triggered once "reconstruction" is proposed.

Concern that there are multiple methods for calculating amount of floor area being used, and it is not clear which methods to use for different regulations or purposes. Revisions are needed to the Floor Area Ratio (FAR) regulations. Aspects don't make sense and are unrealistic.

A new Policy/Ordinance Interpretation (Administrative Practice Guideline) has been issued, titled:

"<u>WHAT COUNTS?</u>" AS SQUARE FOOTAGE WHEN EVALUATING PROPOSED RESIDENTIAL IMPROVEMENTS AGAINST FLOOR AREA RATIO (FAR) AND OTHER STANDARDS THAT INVOLVE SQUARE FOOTAGE DETERMINATIONS

The above new Administrative Guideline was issued in Fall 2011. The County Zoning Code includes an FAR standard for those zoning districts that have a minimum lot size standard of less than 16,000 square feet. Zoning districts with a minimum lot size of 16,000 square feet or greater are NOT subject to an FAR standard, and therefore the "FAR Calculation" does not apply. This reflects a policy basis of more closely regulating bulk and mass of homes in areas where residential lots and homes are located in closer proximity to each other.

The residential zoning districts that contain an FAR development standard include RB, R-1 single-family districts with less than a 16,000 square foot minimum lot size standard, and the R-M multi-family districts. Zoning districts that allow single family and other residential development that DO NOT contain a FAR standard include the RA, RR, A, AP and CA districts.

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Note that even if an actual lot in the districts that do not contain an FAR standard is less than 16,000 in size, it still is NOT subject to the FAR calculation.

In order to prevent use of inconsistent or erroneous methods of calculating FAR, the referenced Policy/Ordinance Interpretation contains a "FAR Calculation Chart" that more clearly explains the intent and method of calculating FAR, for those projects that are subject to an FAR development standard. The chart addresses each element or type of square footage that may be associated with a single family residential building. The prior "FAR Worksheet" used by the Department is obsolete.

Note that until staff develops and the Board of Supervisors adopts a clarifying code amendment, BOTH the definitions of "floor area" AND "habitable floor area" are used to determine the applicability of many other code provisions and requirements, including the Large Dwelling Unit calculation for the purpose of determining whether a project requires a discretionary design permit and must be found consistent with the Large Dwelling Design Criteria in Section 13.10.325(d).

Help the citizens by simplifying the regulations. Simplify and clarify.

Modernizing, clarifying and streamlining regulations and the regulatory process is a top priority of the Planning Department, to be done in a way that continues to respect community and environmental values. The changes that are listed below have been completed in order to modernize, simplify, clarify, streamline and/or provide standards where there were no clear standards previously (such as for vacation rentals). After the list of completed code amendments a list of new or updated Policy/Ordinance Interpretations and Administrative Guidelines and Practices is reviewed. Also shown are a list of code amendments currently scheduled for public hearings, as well as a list of other amendments being worked on by planning staff.

Code Amendments completed as of March 1, 2013 include:

- New Nonconforming Uses and Structures Ordinance and related changes to remove the "altered wall" approach from the County Code. New ordinance based on new General Plan policies that are more accommodating of work on and improvements to existing legally nonconforming structures and structures occupied by nonconforming uses.
- Changed parking requirement for general retail, professional office and medical office uses to modern industry standards (went from one space per 200 sq.ft. to one parking space per 300 sq. ft. for retail/office and changed medical office calculation method).
- Expanded opportunity for greater reductions in parking requirements through use of shared parking and Transportation Demand Management strategies.
- Created opportunity to intensify uses or change parking lots at existing sites and NOT need to increase parking supply, if the increased parking requirement or change in parking supply is 2 spaces or less, or less than 10%. This facilitates changes of commercial uses as well as retrofits of existing parking lots to accommodate ADA accessible parking spaces.

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- Expanded height exception provisions to allow commercial structures to request up to five-foot increase in height limit, with a discretionary development permit. Also, height exceptions are allowed without any zoning permit to screen parapets and mechanical equipment.
- Minor Exceptions provisions added to code so that minor deviations from development standards (such as setbacks, height and lot coverage) can be considered by planning staff administratively rather than at a public hearings, as "minor variances", on sites within the Urban and Rural Service Areas. Within nearly all zoning districts (but not within Planned Unit Developments (PUDs -- which have specifically tailored standards), the following may be considered without a public hearing:
 - Up to a 5% increase in allowed height. For example, the usual 28-foot single-family residential height limit may (if administrative permit is approved), be increased by 16.8 inches, for a limit of almost 29-1/2 feet. The usual 35-foot commercial height limit may (if approved), be increased by 21 inches to 36.75 feet.
 - Up to a 15% reduction in front, side and rear setback requirements. For example, if a Minor Exception is approved a 5-foot side setback may be reduced by 9 inches to 4 feet, 3 inches, or a 20-foot front setback may be reduced to 17 feet.
 - Up to a 15% reduction in the 10-foot separation between structures requirement, which could allow for an 8-1/2 foot separation to be approved.
 - Up to a 7.5% increase in Floor Area Ratio (FAR) on smaller lots of 4,000 square feet or less, such that the usual 50% FAR standard may increase to 57.5%.
 - Up to a 15% increase in total lot coverage (ground floor site coverage), which results in the following possible lot coverage standards:
 - For lots with a usual 40% maximum lot coverage up to 6% additional (46%) through the Minor Exception process.
 - For lots with a usual 20% maximum lot coverage up to 3% additional (23%) through the Minor Exception process.
 - For lots with a usual 10% maximum lot coverage up to 1.5% additional (11.5%) through the Minor Exception process.
- Modified setback standards to provide greater flexibility to encourage placing garages at rear of properties.
- Provided an exception to reduce certain setbacks to protect environmental resources.
- Modified permit processing requirements to allow greater use of administrative approvals with public notice but not public hearings, which allows buildings of 5,000 square feet or less to be processed administratively, rather than the former 2,000 square foot limitation for administrative permits.

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- Increased opportunities for public appeals of administrative decisions, to allow for local consideration by Zoning Administrator, Planning Commission and/or Board of Supervisors rather than the court system.
- New Medical Marijuana Dispensary Ordinance allowing dispensaries within certain commercial areas that meet specific locational criteria. Processing permit applications and implementation of the ordinance is currently on hold due to a moratorium adopted by the Board of Supervisors, who are awaiting the outcome of certain cases before the California Supreme Court.
- New Water Efficient Landscaping Ordinance (WELO) more tailored to conditions within the unincorporated area, to replace the State standards that had been in effect.
- New fence ordinance that updated standards more consistent with current practices observed throughout the County. New, simplified, and low-cost "Over Height Fence Certification" permit established as a mechanism to obtain approval for increased heights in acceptable locations. In most cases for these over-height fences, the "Over the Counter" process is available for a same day building permit issuance.
- New Vacation Rental ordinance that allows single-family units to operate as vacation rental units, within established parameters, with a low-cost vacation rental permit. In the coastal Live Oak/Harbor area only (the "Live Oak Designated Area" or "LODA") there are limitations on concentration of vacation rentals within any given block, such that no more than 20% of the homes are allowed to be vacation rentals unless that 20% threshold had already been exceeded by recognized existing vacation rentals.
- The County completed a comprehensive "re-codification" of the entire County Code, which incorporates all ordinance amendments and is presented in a more readable format. This is providing greater certainly for anyone using the Code; that the most current regulations are available at the public zoning counter and on the website. The re-codification was effective in early February 2013.
- Modified "milestone" approach for building permits to offer greater flexibility and more realistic timeframes for inspection of framing, electrical, mechanical etc.

New or Amended Policy/Ordinance Interpretations or Administrative Guidelines/Practices:

- Refer to page one of this document regarding the new "What Counts" as square footage when calculating Floor Area Ratio (FAR) in the zoning districts with an FAR standard, habitable square footage, and floor area.
- "Level One Change of Use" procedures have been streamlined; further improvements are being evaluated for inclusion in the set of code amendments involving updates of the use charts, development standards and Chapter 18.10 permit process provisions.
- New "Attics" document outlining what level of improvements may be made to an attic and what level will cause the attic to no longer be considered an attic.

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- There is no longer any policy or requirement to have a height survey be prepared if your home is within two feet of the height limit; such surveys would only required in unusual circumstances such as difficult topography.
- There is no longer any policy or requirement to submit house designs when applying for a lot split, parcel map or tentative map.
- As an alternative to having a variety of technical reports prepared to prove that each of the two lots involved with a lot line adjustment are developable; a Lot Line Adjustment may be processed with a deed restriction recorded for any lot that is in question, so that the technical reports would be prepared to demonstrate that the lot meets standards such as access, septic suitability and geologic suitability only at the time development may be proposed in the future.
- A new "CUREC" cost recovery fee has been adopted by the Board of Supervisors, which is an acronym for "Construction Unpermitted Recover Enforcement Costs". The fee doubles the usual amount of building plan check, processing and inspection fees. Building Inspectors or other staff out in the field who notice unpermitted construction (no permit has been applied for or issued but construction activity is occurring), will post a "Stop Work" notice and will not wait for a citizen complaint. This practice is reducing the level of unpermitted construction, as owners and contractors realize that there will be a consequence of taking the risk, even though neighbors do not complain.
- An expanded "Over The Counter" (OTC) process is available for obtaining building permits, with the service available during all hours the public counter is open (Monday through Thursday until 3:00 PM but closed for lunch between 12 noon and 1 PM). Some building permits will indeed be processed on the same day, while others may take a few days, depending on the application.
- A "Standard Tenant Improvement Plan" has been prepared and is available free for applicant use, in order to assist small business owners in quickly preparing and obtaining building permits without the need to hire and pay for professional expertise.
- A "Standard Residential Type V Plan" has been developed and is available to applicants free of charge to assist homeowners with small home improvement projects. The Plan allows homeowners to prepare simple plans themselves without the need to hire and pay for professional expertise.

<u>Code Amendments currently being scheduled for public hearings by the Planning Commission and Board of Supervisors include:</u>

- Reduction of setback requirements for Soil Dependent Greenhouses/"Hoop Houses" on agricultural lands from the existing 20 feet for front, rear and sides; to 10 feet, with no setback required at rear and sides if parcels under common ownership or leasehold.
- Modification of Large Dwelling Unit design permit requirements, to require discretionary permit for homes 5,000 square feet or larger, rather than the existing threshold of 7,000 square feet or larger.

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• Amendments to Chapter 13.20, the Coastal Permit Regulations, will be considered by the Planning Commission in March 2013, by the Board of Supervisors in April/May 2013, and by the Coastal Commission in Fall 2013. Refinements (retractions) to the boundaries of "highly scenic areas" and "special communities" are proposed to better reflect existing conditions, which would simplify permit requirements for some property owners. Also, an Administrative Coastal Permit would become available for certain types of projects, meaning a less expensive and quicker process with action taken by planning staff rather than at a public hearing. While State law allows for these administrative coastal permits, the County has not had such a mechanism.

Code Amendments currently being worked on by staff include:

- Modernization of select development standards related to hotels to reflect current industry standards.
- Provide for sign exceptions process to allow greater flexibility for signage on buildings.
- Expand the ability to apply for Minor Exceptions throughout the unincorporated area, rather than just within the urban and rural service areas.
- Update Chapter 16.01 Environmental Regulations, and the County's CEQA Guidelines, to reflect current State of California CEQA law and guidelines.
- A comprehensive re-structuring and modernization of the County Codes relating to development ("Volume II") is a major priority of the Department. This effort involves a modernization of the "use charts" of each zoning district, as well as certain updates to applicable development standards. Also, Chapter 18, dealing with the permit processes, will be updated and simplified. It will be proposed to eliminate the "Level 1 through Level 7" permit nomenclature, and define the types of discretionary permit processes, and what types of entitlements/permits (e.g. "conditional use permits", "rezoning") go with what type of review and decision-making process. Due to the extent of work involved, a preliminary draft of this work will not be completed and scheduled for public review and comment until Fall of 2013. Time for public review and comment on preliminary drafts, revision of the proposals, CEQA environmental review, and public hearings by the Planning Commission, Board of Supervisors and Coastal Commission mean that this comprehensive amendment of Volume II is not likely to be adopted and in effect until the end of 2014.
- The Department obtained a grant to update the geologic hazard and floodplain ordinances along with the General Plan Safety Element. A review and update of the grading ordinance will be included in this package.

The full update and modernization of the County Code development regulations have not yet been completed. However, there has been significant progress, and in the interim before the effort is completed the above-reviewed code amendments should assist with more streamlined and less costly reviews of proposed development projects.

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Allow work on existing structures in order to make them better and safer. The Altered Wall process is important to revise, as it is not realistic and gets in the way of improving structures that should not be considered a problem.

As reviewed above, the "altered wall" standard has been eliminated and a new "reconstruction" standard established for determining the applicability of certain regulations or permit requirements. New General Plan/Local Coastal Program policies, and the new nonconforming structures and uses ordinance allow for greater opportunity to obtain building permits for work on existing structures, especially non-residential structures. If a project exceeds the "reconstruction" threshold, a site development permit is required rather than a variance for any non-conformities proposed to continue to exist.

Need better definition or clarification of "attached-detached" and "breezeway" regulations that are used to regulate attaching two structures.

Comment noted. The Department will consider establishing a written "Policy/Ordinance Interpretation" to address this matter, which will be evaluated against Building Code and Zoning Code provisions, to identify appropriate implementing regulations. Any additional needed changes to zoning or building code standards will be evaluated during 2013.

The discrepancy between the minimum garage height requirement of 7 feet for new 2010 Building Code and $7\frac{1}{2}$ feet for Zoning Code should be addressed.

Comment noted. The Department will consider establishing a written "Policy/Ordinance Interpretation" to address this matter, which will be evaluated against Building Code and Zoning Code provisions, to identify appropriate implementing regulations. Any additional needed changes to zoning or building code standards will be evaluated during 2013.

Explain the objectives and intent of policies and regulations and vet for better public understanding.

As the above-referenced code amendments are prepared, the current General Plan and Local Coastal Program ("GP/LCP") will be discussed as the basis for changes that are consistent with and implement these GP/LCP goals and policies. For proposed changes that entail a new or refined policy basis, GP/LCP Amendments will be proposed and included in the package as warranted.

There are inconsistent interpretations of the zoning regulations by different staff, which can result in an applicant "getting wrong answers." Need more clear codes and adequate staff training.

Comment noted. Simplification and modernization of the codes will make it much easier for staff, the public and decision-makers to apply consistent interpretations of the code. This process is underway. The newly-adopted and up-to-date County Code Re-Codification is also ensuring that the most current version of regulations is available on the website and being used by all.

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Department managers and planners do hold section meetings and training sessions to discuss code interpretations. Training is held after new regulations are adopted in order to ensure proper implementation. Also, a series of inter-departmental "cross-training" classes are occurring, offered by in-house experts to all personnel involved with the land use permit process.

Applicants can also request that a manager review questionable staff interpretations or determinations.

An existing method of attempting to ensure consistent application of the codes, is to publish "Policy/Ordinance Interpretations". These are essentially "Administrative Practice Guidelines" issued by the Planning Director that present information in a "non-code" format to explain the intent of the code provision(s) and how such are administered and applied. The Planning Department has initiated a process to review all existing Policy/Ordinance Interpretations, to either rescind or update, and will also issue new Interpretations as warranted. Key new/modified Interpretations include one pertaining to "Attics"; and also one regarding "What Counts?" as related to square footage counted toward Floor Area Ratio and Large Dwelling Unit permit requirements, and in other contexts where square footage is a factor.

Support for transit-oriented development, including higher density and reduced parking standards. This would result in more diverse development, which is good for Santa Cruz.

As reviewed earlier, the following changes to parking requirements have been completed, consistent with modern industry standards and more supportive of transit-oriented development:

- Changed parking requirement for general retail, professional office and medical office uses to modern industry standards (went from one space per 200 sq.ft. to one parking space per 300 sq. ft. for retail/office and changed medical office calculation method).
- Expanded opportunity for greater reductions in parking requirements through use of shared parking and Transportation Demand Management strategies.
- Created opportunity to intensify uses or change parking lots at existing sites and NOT need to increase parking supply, if the increased parking requirement or change in parking supply is 2 spaces or less. This facilitates changes of commercial uses as well as retrofits of existing parking lots to accommodate ADA accessible parking spaces.

A grant-funded effort to develop a "Sustainable Community and Transit-Oriented Development Plan" was initiated early in 2012. Land use, transportation and economic consultants are leading the effort, and an Advisory Committee comprised of representatives of local jurisdictions, transportation agencies, and business, environmental and neighborhood groups meet to provide input throughout the process. Community workshops are also held; a series of 6 workshops were held in October/November 2012; and another series will be held in May/June of 2013. An informational website has been established on the Planning Department website.

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One expected outcome of the effort will be a proposed new zoning district and/or zoning overlay district, which would incorporate opportunity for higher density or intensity of development at appropriate locations, particularly along transit corridors such as the Soquel Corridor. Parking standards and street standards will also be reviewed for additional changes that would better support multi-modal transportation. In order for transit to be financially viable, density of uses at certain locations is required. Greater use of transit can result in lower emissions of greenhouse gases and less congestion, which is an outcome that the State of California has mandated, and which local governments are planning to achieve by modifications to land use plans and standards that address locations of jobs and housing, as well as through wise investments in transportation infrastructure.

Support for regulatory reform. Be sure to involve the public. Ordinance language must promote uniform interpretation and clarity.

The process of reforming the codes includes a high level of opportunity for members of the public to participate, including Focus Groups, Community Workshops, the CEQA environmental public review and comment period, and Public Hearings before the Planning Commission, Board of Supervisors and California Coastal Commission.

While planning department staff is working on developing proposals for code changes, that work is considered a "work in progress" and administrative draft ordinance materials are generally not available for public review. However, once work has gelled sufficiently the Planning Department will make Preliminary Draft ordinances available for review and comment by the public. Subsequent revisions and ultimately the Draft Ordinances (and any GP/LCP Amendments) that are the subject of the CEQA environmental review process and public hearings are also fully available to the public.

Citizens should take some responsibility for the current regulations.

Codes and regulations should reflect and implement statewide and community values as expressed in State Laws (including but not limited to the California Planning, Zoning and Development Code, the State Subdivision Map Act, the California Environmental Quality Act, the California Coastal Act and many other State laws) as well as the local County of Santa Cruz General Plan/Local Coastal Program and other local policies and standards.

As values shift over time, or as the "state of knowledge" or "industry standards" change over time, it is appropriate to amend, update and modernize code provisions. At times, these changes also warrant amendments to GP/LCP goals and policies.

Any and all of the GP/LCP amendments and Code Amendments require final adoption by the County Board of Supervisors, and most also require final approval by the Coastal Commission.

Codes are important for safety.

Fundamentally, building codes are established to ensure that minimum standards of safety are attained.

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Review the current regulations. Consider eliminating one at a time in a way that will not impact the community.

The code update process will identify "packages" of code amendments that relate to addressing a particular issue or objective of the update. The Planning Department agrees that it would be too large a project to update the code "all at once", therefore the effort is based on selected topic areas that need updating.

The septic one-acre minimum requirement should be revisited. Lot line adjustments to result in one-acre lots to meet the septic requirements should be allowed.

Lot line adjustments are allowed, and can be part of an applicant demonstrating that an adjusted lot configuration is able to meet septic and other requirements such that the lot is developable. The Environmental Health Division has stated that there is no current work plan to revisit the one-acre minimum.

The current regulations are difficult and often require the hiring of land use professionals.

Modernization of the codes should help make the codes more straightforward for applicants to access and understand. However, certain development projects are complex, particularly when located in an area with environmental constraints. While staff is available to assist property owners with understanding the codes and how they are affect a property, at times it can be helpful to an applicant to hire an experienced professional for advice on how to structure the proposed project and/or as a "project manager", especially if the property owner does not have development experience. Also, some projects do require submittal of professional and technical reports from consultants, such as geotechnical reports, arborist reports, traffic studies, and so forth.

The nonconforming regulations lead to working without permits.

We realize that if regulations and permit processes are overly difficult, complex, time consuming and expensive, that this can create an incentive for some to perform work without permits, which can jeopardize the safety of building occupants and the community. An overriding goal of the Planning Department's effort to modernize codes and streamline permit processes, which may also lead to lower fees, is to make it more straightforward and predictable for applicants so that owners engage with the County and obtain permits and building inspections. Progress has been made. It is important for owners to realize that the County will post "Stop Work" notices when observing work without permits, and that "double fees" for plan check, processing, inspection and grading permit is a consequence of deciding to undertake improvements without a permit, and then being "red tagged" by the County.

The Code amendments related to "altered walls", the new Nonconforming Ordinance, the new commercial use and parking standards, and various other code amendments have been completed. Changes to permit requirements have been made and are being processed that will allow less expensive review processes for required permits. These and other changes in the regulations are intended to provide more workable regulations, decrease the temptation to do

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work without permits, and thereby improve the safety of structures and the general public. A "construction legalization/amnesty" program is also being considered, which is tentatively scheduled to be discussed by the Board of Supervisors during 2013.

Increase the height limit to 35 feet due to increasing scarcity of undeveloped land.

A change to the code was adopted in March 2011 that allows commercial heights to increase by 5 feet over the standard 35-foot height limit, if a site development permit is obtained. Also, height exceptions are allowed (with no discretionary permit requirement) to screen parapets and mechanical equipment.

The Code has, for quite some time, allowed residential height limits to be increased from the usual 28 feet, to up to 33 feet with greater setbacks and/or design review.

Reconsider the dates of the winter grading rules.

Applicants may apply to do grading work in the winter, however more stringent erosion control and other standards may be imposed and the project is subject to being stopped during certain weather. Grading is more straightforward when not done in winter, but can sometimes conditionally proceed even during the winter season of October 15 to April 15.

Our community does not use "best practices."

Code modernization and the outcome of the Sustainable Community and Transit Oriented Development Plan will allow for better incorporation of modern best practices.

The County Code is awful, especially the design review regulations. Instead, use form based codes: they are state of the art. Be area specific. Pleasure Point was a good start.

Code modernization and the outcome of the Sustainable Community and Transit Oriented Development Plan will allow for better incorporation of best practices, including the possibility of using form based codes as well as area-specific policies and standards.

Overall, a beautiful community is not resulting from the planning process. "Squeezing out the design." Ironic that there are so many requirements and regulations, but design review and quality of the project does not seem to be much of a consideration.

As noted above, under the current County Code, single family homes are only subject to design review if they are proposed within special communities or sensitive sites, or if they are "Large Dwelling Units" (currently defined as 7,000 or more square feet of habitable area, however a code amendment is currently being processed to reduce this threshold to 5,000 square feet).

For development other than single family homes, there is somewhat limited "design review" that occurs through the site development process. In certain areas within the coastal zone "neighborhood compatibility" is a consideration, but this also is generally a fairly permissive

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standard. There is no "Architectural Review Committee" that reviews and comments or approves architectural designs.

Some members of the community would agree with the commenter that the County should have a greater focus on design review to obtain higher quality building materials and design, however the current code does not reflect that approach. However, others believe that the County should have no jurisdiction to review design. The balancing of these two perspectives is done by the Board of Supervisors (and Coastal Commission) as regulations are adopted.

The 28-foot residential height limit in the rural areas is too low.

The current code allows a home to be greater than 28 feet if the project incorporated greater setbacks or is submitted for design review. While this is a discretionary permit process that does require more time and fees than simply submitted for a building permit, it does at least offer a route for a home to go to 33 feet.

A more comprehensive re-structuring and modernization of the County Codes relating to development ("Volume II") is a major priority of the Department. This effort involves a modernization of the "use charts" of each zoning district, as well as certain updates to applicable "development standards" such as yard setbacks and maximum heights. As part of that effort, the County will consider whether the height limit in rural areas should be increased.

Due to the extent of work involved, a preliminary draft of this work will not be completed and scheduled for public review and comment until Fall of 2013. Time for public review and comment on preliminary drafts, revision of the proposals, CEQA environmental review, and public hearings by the Planning Commission, Board of Supervisors and Coastal Commission mean that this comprehensive amendment of Volume II is not likely to be adopted and in effect until the end of 2014.

You cannot regulate design. Trust the architects for a change. Go back to basics. Multiple regulations do not equal protection.

Current county code regulations establish "development standards" such as front, side and rear yard setback requirements, lot coverage limits, height limits, and parking supply requirements. These standards generally combine to regulate the allowable intensity and size of development on a site. For certain zoning districts, a Floor Area Ratio (FAR) standard further acts to regulate the size/intensity of development. Other regulations that potentially result in design constraints are environmental and public safety protection regulations involving riparian and sensitive habitats, floodplains, geologic and soils conditions, erosion control and stormwater runoff/drainage, septic system standards, and road access requirements.

See responses to above two comments for additional information about design review practices within the unincorporated area.

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In one Los Angeles city, the regulations consist of two pages. The adjacent City of Santa Monica has many regulations but the quality of the buildings built is similar.

The commenter's point that more words does not necessarily relate to better regulations is a valid one. The objective of code modernization will be to simplify and clarify the codes in a manner that provides sufficient information about applicable standards, and establishes appropriate permit review processes, without levels of detail that can end up complicating codes or processes without appreciable benefit to outcomes. However, we expect that it will continue to be a fairly lengthy document in order to provide the information, clarity and nuanced regulations that are desired by the community.

Concerning Second Units, regulations should be changed to not require the property owner to live on-site after a certain number of years.

Second unit regulations are consistent with State law. Most (if not all) jurisdictions require an owner to reside in one of the units. Second units are allowed in "single family" zoning districts that typically do not allow "duplex" or "multiple units" on a single family lot. The State of California determined to allow "second units" on single family lots only if various criteria are met, such as those relating to unit size.

Consider allowing Class K housing that must meet health and safety standards only.

Class K is not an acceptable approach to meeting housing codes in the County.

Planning authority should be limited to health and safety.

Fundamentally, zoning, environmental and building codes are established to ensure that minimum standards of safety are attained. However, the codes also incorporate required State laws and reflect community values, policies and standards.

A person recently had a PDSR (Predevelopment Site Review to determine applicable planning and environmental regulations for a project) prepared. Adjacent houses have existing 5-foot side yard setbacks. He is required to have 15-foot side yard setbacks. Wonders if there is anything in the works to relax this standard or make obtaining a variance easier.

As part of the "Minor Exceptions" code amendment package, variance findings were amended to more accurately reflect state law, which allows for consideration of surrounding properties.

In the commenter's example, it appears that the other existing homes are "nonconforming" with respect to current zoning district side yard setback requirements. While the above review of development standards could potentially change the 15' requirement, it is likely that this is a rural setback standard that is desired by the community to be the appropriate current standard. However, the opportunity to apply for a minor exception or variance does exist, and if the applicant can demonstrate that there are "special circumstances", including the fact that the norm for most surrounding/adjacent homes is to provide a lesser setback, it may be possible for the County to decide that a minor exception or variance is warranted for the subject site.

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A comprehensive re-structuring and modernization of the County Codes relating to development ("Volume II") is a major priority of the Department. This effort involves a modernization of the "use charts" of each zoning district, as well as certain updates to applicable "development standards" such as yard setbacks and maximum heights. It is not expected that this major effort would be approved by the Board of Supervisors as well as the Coastal Commission, and in effect, until the end of 2014.

Concerning the Minor Exception process: make sure exceptions do not reduce protection of natural resources. Concern expressed that the Minor Exception process may be available to legalize illegal construction and make it easier to obtain an "after the fact" permit.

The Minor Exception process adopted by the Board is essentially a "mini-variance" – i.e. a defined subset of minor variations from the usual development standards of the zoning district, for which the Board has decided that a public hearing is not required and applications within the defined parameters may be decided upon by staff. The usual "findings" or statement of reasons why the variance is being approved, still must be made by the decision-maker. The Minor Exception is a discretionary permit subject to CEQA environmental review, and all environmental standards remain in effect.

Any code compliance project can apply for a Variance, or a Minor Exception, as part of the process of legitimizing work done without benefit of permits. Code standards and findings for approval of the request still must be met and made.

Concern expressed that the one-acre minimum (for septic purposes) will be increased.

Staff is not aware of any proposal to increase the one-acre minimum.

Concern expressed that the current minimum riparian setbacks will be reduced through the Minor Exception process. The person has seen projects built within 10 feet of a stream, not the required 50 feet.

The Minor Exception permit process does not obviate or substitute for a required Riparian Exception permit that may be required for projects in proximity to riparian resources.

Need to balance between needed drainage improvements and riparian corridor protection.

Comment acknowledged and will be forwarded to the Department of Public Works – Drainage Division.

Need better definition or system to determine boundaries of riparian corridors. The definition of "riparian corridor" needs revision and clarification.

The County Planning Department will take up review of riparian and certain other environmental regulations within the 2013/14 timeframe. This will involve researching definitions and systems in use in other jurisdictions, with the objective of proposing an update

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to the County's definition and ensuring that it is "science- and resource-function based". Some jurisdictions establish standards on a case-by-case basis for each property, taking a variety of factors into account such as top of bank, hydrophilic (water-loving/dependent) vegetation, and adjacent/overall stream and corridor characteristics, in establishing the boundaries of the riparian corridor and any applicable development setback therefrom.

Revisit the definition of "riparian" areas. The current definition is unclear. This leads to the requirement for professionally prepared reports.

See response above. Also, while a requirement for professionally prepared reports may be perceived as a burden, it is intended to provide site-specific information regarding the status of the resource on a site, and the appropriate setbacks to and management of that resource. This approach can allow for appropriate flexibility based on the context of the specific site.

It would be helpful if written guidelines regarding requirements for different types of projects were made available.

We agree that some examples or "case studies" for various types of common projects would be helpful, including what plans/information is required, what the permit process consists of, and typical range of permit costs and time. The Department will work on developing such and making them available at the public counter and on the department website.

Currently, the type of information required for various types of permit applications is shown by a "List of Required Information" (LORI), available by visiting the public counter and explaining your project concept, or for viewing on the department website.

Staff needs to know that the San Lorenzo Valley is different; there are more concerns present such as drainage, fire, etc. Streamlining can go too far.

San Lorenzo Valley is largely rural, with areas of somewhat more "urban" development such as parts of Felton. Sites in the Valley typically involve a greater degree of environmental considerations when considering development. Due to the sometimes more-difficult permitting process, development without permits occurs even more frequently in the Valley, which can lead to public safety issues and environmental degradation. Code compliance is a significant concern among many Valley residents, while other Valley residents desire the County to "leave them alone". It is hoped that code modernization and permit streamlining will lead to more property owners obtaining permits, with consequent safety benefits for occupants and neighbors.

The County created a "maze" of regulations in the 1970s-1980s.

The County did adopt additional regulations during that time period, however the County was not alone, as the State of California had adopted many new environmental laws which cities and counties needed to comply with. These included the Coastal Act and the California Environmental Quality Act, which led to significant changes to how proposed land use developments were analyzed and considered by decision-makers. Protection of the

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environmental assets of Santa Cruz County has been an important community value, and also supports important economic sectors such as agriculture and tourism.

Other jurisdictions have set criteria for allowable variations to approved plans. The City of Oakland is a good example.

Staff will evaluate the City of Oakland example for its possible applicability at the County of Santa Cruz. The approved new Minor Exceptions and commercial height exceptions provisions are examples of this type of approach.

Revise the currently required 30-foot minimum setback from residentially zoned property to commercial buildings. Variances to this standard are always approved.

The County will evaluate whether the current setback standard has been working and is appropriate, or whether this setback should be reduced.

Change the current prohibition of placing greater than 50 cubic yards of fill within a floodplain. The size of the lot should be a factor.

Work on updating the grading ordinance and the geologic hazard/floodplain ordinance has begun, and this idea can be considered during that process.

Increase current 35-foot commercial height limit to 40 or 45 feet.

The County has adopted expanded height exception provisions to allow commercial structures to request up to a five-foot increase in the height limit, with discretionary development permit. Also, height exceptions are now allowed (without a discretionary permit) in order to screen parapets and mechanical equipment.

A comprehensive re-structuring and modernization of the County Codes relating to development ("Volume II") is a major priority of the Department. This effort involves a modernization of the "use charts" of each zoning district, as well as certain updates to applicable "development standards" such as yard setbacks and maximum heights. It is not expected that this major effort would be approved by the Board of Supervisors as well as the Coastal Commission, and in effect, until the end of 2014. Additionally, the Sustainable Community and Transit Oriented Development Plan may result in a recommendation to increase height limits.

Increase the current 10% maximum size architectural feature height exception to a higher percentage. This is needed due to new Building Code requirements.

See above.

Allow composting toilets.

Composting toilets are not an acceptable method of providing sanitary treatment in the County.

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Regulatory Reform: Permit Review Process and Customer Service

Application submittal process is long and difficult. Practices are too strict regarding the level of application information that staff determines is adequate for even being able to submit an application. This can result in applicants being turned away at the Counter and not able to submit, when the application could have been accepted and then addressed in the 30-day completeness review.

Managers have evaluated and discussed this point with staff. The commenter is correct that sometimes the project application can be submitted and the review process commenced, even though not every piece of information is available at the time of submittal. However, it is also true that there needs to be sufficient information submitted about the project to that it is clear what is being proposed and how it meets development standards, and so that the 30-day completeness letter does not end up much like the checklist of what is needed for application submittal.

One reason for not obtaining permits is the lengthy, confusing, sometimes far-reaching planning process, permit fees, and impact fees: too much time, risk and money so people build without permits. Support for an amnesty program.

Staff is evaluating options for how to offer a construction legalization program and/or how to carry out code compliance program activities in a manner that would lead to more owners obtaining building permits and having structures inspected for meeting safety standards.

The recent and forthcoming changes in the Code and permit processes should help to make permit processes more straightforward, with less time and expense involved. However, the permit process will remain a "fee for service" activity, meaning that the beneficiary of the service will pay, rather than be subsidized by taxpayer (general fund) dollars. Staff carries out an annual review of fees, to ensure that fees are commensurate with level of effort and cost recovery, but not in excess of cost recovery.

It is the objective of the County and the Planning Department to amend the Code in order to provide more clarity, more opportunity for streamline permit processes, better customer service and appropriate fee levels so that owners do decide to engage with the permit process rather than attempt illegal development activity. The County now issues "Stop Work" notices for construction activity discovered to be underway, and a new "CUREC" fee has been adopted by the Board of Supervisors which amounts to a "double fee" cost recovery system.

Appreciation for the increased Counter hours (afternoons), and use of the Development Review Group for discussion of pending applications.

In Fall 2010, the public counter hours changed from the prior $8\,AM - 11:30\,AM$ Mondays through Fridays; to $8\,AM$ - Noon and $1\,PM - 3\,PM$ Mondays through Thursdays. While it would be ideal to be open to $5\,PM$ and during the lunch hour and on Fridays, the staffing reductions that have occurred over the past 3-4 years due to the state of the national and local

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economy, and consequent reductions in staff and resources, do not allow for that level of service. The Zoning phone line is staffed from 1-4 PM each day, and staff is available via email. Email addresses are available from the planning department website under Contacts.

The Development Review Group provides an opportunity to pull together representatives of appropriate departments and agencies to review and comment on preliminary applications, as well as applications that have been submitted and are being evaluated for consistency with applicable code standards. The DRG allows for discussion between agencies, and increased opportunity for problem-solving and coordination of requirements. This generally is beneficial to applicants in that the time and expense of the permit process is reduced, with greater certainty as to applicable requirements, especially where there is potential for requirements of different agencies to somewhat overlap or conflict.

Questions about whether the Board of Supervisors is sincere in its stated support for regulatory reform.

The Board of Supervisors has been supportive of all regulatory reform proposals brought before the Board in the past three years, and continues to express its desire and support for code modernization and streamlined processes that are more clear and less expensive, but which also continue to reflect community and environmental standards and which allow for public participation as appropriate.

Minor Variation applications are over-routed to agencies.

Comment noted. Planning Managers are working with staff to ensure that unnecessary routings do not occur, as these can add to the time and expense of requesting minor change(s) to an approved project.

There is a lack of accountability by staff.

Planning Managers have implemented some new procedures for establishing and monitoring appropriate timelines for project reviews, including other departments and agencies, which are assisting staff in meeting deadlines. Customer service and assistance with problem-solving have been emphasized as expectations of staff. Inter-departmental training is occurring, as is an inter-departmental effort to analyze the permit process with the objective of having more of a "one-stop" permit process that is streamlined, less expensive, and customer-friendly.

Provide an opportunity to review plans with the plans checkers at the submittal stage.

The Department now offers an "Over the Counter Plan Check" service during all hours that the public counter is open, which has increased the availability of plan checkers to review and answer questions at the building counter, and to approve certain OTC building permits either on that same day or within a few days.

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Unhappy that building permit deferred submittals are processed as "change orders".

The Interagency development services review team is reviewing this practice, however generally this approach is pursued because the Department is required to recover all costs associated with processing a planning or building permit application.

Inspections of commercial projects are currently handled like residential inspections and this does not work well.

The Building Official has changed this process. If you have further concerns, please contact the Building Official and bring them to his attention.

People fear the County.

Please don't! We're pretty nice people trying to help administer and assist you to comply with a myriad of code requirements as required by State and County laws.

Look into the disconnect and lack of communication between the Planning and Public Works Departments.

The Planning and Public Works Departments recognize that the departments are partners in reviewing proposed development projects, and strive for good communication and teamwork. We feel that we actually do have good communication and work well together. Also, interdepartmental training is occurring, as is an inter-departmental effort to analyze the permit process with the objective of having more of a "one-stop" permit process that is streamlined, less expensive, and customer-friendly. The Directors of Planning and Public Works have regular meetings to review issues and topics that need to be discussed.

Reduce the current levels of review for projects by one level.

Reducing the "levels" of reviews for some projects was approved in the package of code amendments that included the new nonconforming ordinance. More permits are now able to be granted with administrative (staff) review rather than at a public hearing. Public notice is still provided, but a public hearing is not required and costs of the permit process is therefore lower. Staff has also worked to streamline the permit process for changes of uses in existing non-residential buildings.

More regulations to justify Planning jobs?

We can assure you that planners are not in the business of proposing more regulations in order to increase job security. As previously stated, the level of regulation in a jurisdiction results from a combination of State law along with community thresholds and standards, as reflected in the General Plan/Local Coastal Program and the County Code.

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Address the distrust in the community toward the Planning Department and development regulations, including drainage.

Modernization of the county code, streamlining of permit processing procedures, and an emphasis on customer service has assisted with increasing trust, and the Department will continue to work on those objectives. The development regulations should reflect the standards and thresholds of the community, and the update process will allow opportunities for the public to review and comment on current codes and desired changes.

There needs to be better coordination between reviewing agencies. For example, Public Works drainage requirements sometimes conflict with other agency requirements.

The Development Review Group provides an opportunity to pull together representatives of appropriate departments and agencies to review and comment on preliminary applications, as well as applications that have been submitted and are being evaluated for consistency with applicable code standards. The DRG allows for discussion between agencies, and increased opportunity for problem-solving and coordination of requirements. This generally is beneficial to applicants in that the time and expense of the permit process is reduced, with greater certainty as to applicable requirements, especially where there is potential for requirements of different agencies to somewhat overlap or conflict.

For commercial projects, building inspectors will not do separate inspections of sub-systems. It is unreasonable to expect all rough-in work to be ready for inspection at the same time. Phased inspections are needed for commercial buildings.

The Building Official has implemented a change and this is no longer Department practice. It is no longer required that all framing, mechanical, electrical and plumbing be completed within one "milestone" 6-month phase; which provides a more realistic timeframe and reduces the need to request and pay permit extension fees.

In the past, Planning Department would not allow utility meters to be released until all work was signed off. The meters were held "hostage" to ensure permit compliance. Both electric and gas are needed to commission and test systems prior to occupancy.

The Building Division does have a process and guidelines for Temporary Utilities Release in order to allow for such testing.

A building inspector required permanent survey markers for a foundation inspection.

Requirements for surveys have been reduced from former practices, however there are still times when a survey is needed in order to locate a property line or a structure properly on its site in accordance with the approved development and building permit.

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There is fear of retribution if complaints or appeals are made.

The Planning Department upholds the code and procedures in effect, which include appeal rights and ability to file complaints. In the democratic process, there should be no fear of retribution; rather, the Department must be made aware of these types of concerns or issues so that they may be addressed, whether or not the complaint or appeal is found to be valid or upheld.

It is common to hear County departments criticize the other.

We hope that you are not hearing that these days, as the departments actually feel that we have good communication and are working well together. The Planning, Public Works and other County Departments recognize that the departments are partners in reviewing proposed development projects, and strive for good communication and teamwork. Joint training sessions are offered, an inter-departmental "one stop" team has been formed to explore and implement improvements to development review processes, and Department Directors and staffs do meet to discuss issues that arise.

A person was told that his commercial project processing time would be 1-2 years.

Processing times are always project- and location-specific, and particularly influenced by the potential for complex environmental analysis that may be required, or Coastal Commission approvals that may be needed. If there are concerns about processing times, property owners/applicants are encouraged to discuss such with the appropriate department manager.

Concern expressed about timely release of comments and requirements. For discretionary permit applications, an applicant should be able to know, discuss issues and deficiencies and resubmit information prior to the preparation of the 30-day completeness letter. Have the planner contact the applicant early in the 30-day process.

At times the permit review process will allow for earlier communication to the applicant about information needs, issues or deficiencies; however the 30-day completeness letter is an aspect of permit review that is required by State law. It compiles comments from other departments and agencies, and it is not always possible to compress that timeframe given other duties, responsibilities and deadlines faced by staff planners. Staff have been encouraged to make phone calls to applicants prior to sending the 30-day completeness letter.

Concern expressed about new requirements resulting from subsequent review of plans.

Requests for new information to be submitted well after project submittal can be of concern, although at times new informational requirements may appear due to changes in plans from the initial submittal. Managers and staff seek to ensure that the 30-day completeness letter is comprehensive with regard to the list of additional information needed. With respect to "requirements" in terms of identification of standards that must be reflected or incorporated into project plans, and which may be made conditions of approval, these cannot always be identified immediately. The CEQA environmental review process, and the final analysis of a

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proposed project against applicable standards, produces the recommended "mitigation measures", conditions of approval and/or plan check comments that staff make for a proposed project. This occurs at the culmination of project review, not always right at the beginning. At times the project review process is "iterative", with the project changing in response to staff analysis of consistency with applicable codes and environmental review.

Accessibility review at the discretionary permit stage required preparation of architectural plans.

Some levels of accessibility ("ADA") review are appropriate to occur at the discretionary review stage, particularly "path of travel" and "accessible parking space number, size and locations". Other aspects such as percent grade and more detailed aspects are appropriately prepared as part of the building permit submittal rather than the discretionary/zoning permit submittal.

Several people agreed that architectural plans, especially drainage plans, should not be required in order for a discretionary permit application to be deemed "complete" for processing.

The Department has recently revised permit submittal requirements for greater consistency with the adopted County Code. Architectural plans are no longer required for lot line adjustments, minor land divisions, or subdivisions. An applicant may determine that it is in the best interest of a proposed project to prepare and submit architectural plans along with those requests, however the Department will not mandate such.

The Planning Department agrees that detailed drainage plans should not be required in order to submit for discretionary/zoning permits, and that such a level of detail is appropriate at the building permit stage. However, at times some level of drainage information will be required, in order to establish the feasibility of the project to meet applicable drainage requirements such as sufficient area and location for on-site retention/detention. However, at times it will be more appropriate to require submittal of drainage information after the project is "standing still", rather than at the initial project submittal stage. Sometimes a project may change after review by planners or other agencies, and that would then necessitate revision of detailed drainage plans, which is not cost-effective for the applicant and causes unnecessary repeated reviews by drainage staff.

Requiring detailed plans, especially accessibility and drainage, at the discretionary permit application stage is very expensive and occurs at the beginning "at risk" stage of the project. If revisions are needed during the course of discretionary or CEQA review, that necessitates revisions to all of these detailed plans. The discretionary plans should be detailed only as much as needed for zoning development standards, feasibility determinations regarding other technical requirements, and so forth. The detailed plan specifications for certain factors should be required as conditions of approval, to be shown on Building Plans and Improvement Plans.

The Planning Department agrees with this comment, and the Inter-departmental "One Stop" development services team is actively discussing and refining practices. See above.

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Concern expressed about being required to design to a drainage standard that is not yet in effect

This concern was relayed to the Department of Public Works, and drainage staff. The County has now adopted Chapter 7.79 of the County Code, which addresses Stormwater Runoff and Pollution.

Regulations and staff should avoid using negative language such as nonconforming or substandard when describing existing lots (such as those on Beach Drive). This damages property value and is unfair. Legitimate lots should be recognized as the legal developments they are.

The term "nonconforming" is usually well-understood in the banking, finance and insurance worlds, as meaning LEGAL nonconforming. Having said that, the new proposed Nonconforming Ordinance that is being processed in Fall 2011/Winter 2012 will offer greater flexibility to obtain permits for nonconforming structures and uses, and will allow much easier reconstruction after a disaster, which property owners and financiers alike should appreciate.

There is an adversarial "us against them" feeling at the Planning Department. Public employees should recognize that applicants need their help and that is part of their job.

Modernization of the county code, streamlining of permit processing procedures, and an emphasis on customer service should assist with increasing trust. The development regulations should reflect the standards and thresholds of the community, and the update process will allow opportunities for the public to review and comment on current codes and desired changes.

Customer service and assistance with problem-solving have been emphasized as expectations of staff. An inter-departmental "one stop" development services team has been formed and is analyzing and discussing ways to improve the permit review process and customer service.

A person was turned away from submitting an application.

Managers are evaluating and discussing this point with staff. The commenter is correct that sometimes the project application can be submitted and the review process commenced, even though not every piece of information is available at the time of submittal. However, it is also true that there needs to be sufficient information submitted about the project to that it is clear what is being proposed and how it meets development standards, and so that the 30-day completeness letter does not end up much like the checklist of what is needed for application submittal.

Support for peer review, therefore, County work should be peer reviewed, perhaps by a professional design review board. There should be more collaboration with professionals.

The process of reforming the codes includes a high level of opportunity for members of the public to participate, including Focus Groups, Community Workshops, the CEQA

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environmental public review and comment period, and Public Hearings before the Planning Commission, Board of Supervisors and California Coastal Commission.

The Planning Department has made a point of conferring and discussing possible changes with appropriate groups of professionals, such as architects, engineers, soils engineers, geologists, biologists, and land use planning consultants.

Hope expressed that these community forums will result in additional workshops. The AIA (The American Institute of Architects) members are willing to participate. Supports peer review of County work.

We appreciate and encourage participation by AIA members. Also see above.

Certain groups do not want regulatory reform.

Codes and regulations should reflect and implement statewide and community values as expressed in State Laws (including but not limited to the California Planning, Zoning and Development Code, the State Subdivision Map Act, the California Environmental Quality Act, the California Coastal Act and many other State laws) as well as the local General Plan/Local Coastal Program.

As values shift over time, or as the "state of knowledge" or "industry standards" change over time, it is appropriate to amend, update and modernize code provisions. At times, these changes also warrant amendments to GP/LCP goals and policies. Modernization of codes to simplify and clarify is a goal, and staff believes that this can be done in a way that continues to respect community and environmental values.

Any and all of the GP/LCP amendments and Code Amendments require final adoption by the County Board of Supervisors, and most also require final approval by the Coastal Commission.

Workshops requested to assist applicant through the permit process.

Planners, building plan checkers and building permit technicians are available to assist members of the public with the permit submittal process at the public counter. In Fall 2010, the public counter hours changed from the prior $8\,AM - 11:30\,AM$ Mondays through Fridays; to $8\,AM$ - Noon and $1\,PM - 3\,PM$ Mondays through Thursdays. While it would be ideal to be open to $5\,PM$ and during the lunch hour and on Fridays, the staffing reductions that have occurred over the past 3 years do not allow for that level of service.

Applicants are also able to attend Development Review Group (DRG) meetings. The DRG meeting provides an opportunity to pull together representatives of appropriate departments and agencies to review and comment on preliminary applications, as well as applications that have been submitted and are being evaluated for consistency with applicable code standards. The DRG allows for discussion between agencies, and increased opportunity for problemsolving and coordination of requirements. This generally is beneficial to applicants in that the time and expense of the permit process is reduced, with greater certainty as to applicable

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requirements, especially where there is potential for requirements of different agencies to somewhat overlap or conflict.

Private property rights are being trampled.

Modernization of the county code, streamlining of permit processing procedures, and an emphasis on customer service should assist with increasing trust. The development regulations should reflect the standards and thresholds of the community, and the update process will allow opportunities for the public to review and comment on current codes and desired changes.

Certain changes have also occurred related to the code enforcement process, and Notices of Violation are much less frequently being recorded on titles to property. Owners are provided additional time to undertake compliance efforts; recordation on title is a consequence of not proceeding in good faith to address the violation.

A person was at the Zoning Counter asking question and was told that a copy of the pertinent portions of the County Code were not available to the public. The County Code should be made accessible to the public.

The County Code was in the process, for several years, of being "re-codified" by a professional consultant codifier. That effort has been completed, and as of February 2013 the newly codified code is now available through the County website. The Code was always available, but at times not very clearly accessible. Additionally, the Planning Department has completed an update of the planning department website, which has been operational since Fall 2012. A wealth of information is available through the website. Also, the Geographic Information System (GIS) is a valuable tool for obtaining information about a parcel or site.

Look into the concept of low cost permits with a waiver or indemnification feature that would allow homeowners to go forward in meeting codes on their own.

This concept is not supported by State law.

The Business Council wants private/public partnership regarding regulations, best management practices, costs, permitting. Examples include the current height limits for mechanical equipment and the need for 4-5 story buildings.

A change to the Code was adopted in March 2011 that allows commercial heights to increase by 5 feet over the standard height limit, if a design permit is obtained. Also, height exceptions are allowed to screen parapets and mechanical equipment. Code modernization and the outcome of the Sustainable Community and Transit Oriented Development Plan will allow for better incorporation of best practices, including the possibility of using form based codes. Increases in height limits for certain districts or locations will also be a topic of discussion.

The Planning Department has made a point of conferring and discussing possible changes with appropriate groups of professionals, such as architects, engineers, soils engineers, geologists,

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biologists, and land use planning consultants. Members of the business community, neighborhood groups, environmental organizations and other stakeholders are also invited to participate in Focus Groups, Workshops and Public Hearings. The Sustainable Community planning process also involves an Advisory Committee comprised of a variety of interest groups and stakeholders.

Why is the soils report review process so costly and lengthy? Licensed professionals prepare these reports. Their review by staff holds up the permit process.

The Manager of the section that reviews soils reports has implemented some new procedures for establishing and monitoring appropriate timelines for project reviews, including other departments and agencies, which are assisting staff in meeting deadlines. Customer service and assistance with problem-solving have been emphasized as expectations of staff.

It is taking too long to get things done; for example, the Aptos Village Plan took 10 years. This inflates costs, undermines faith.

It is not clear to current department staff that it took 10 years or why it took as long as it did; as staff involved in that effort are now retired. However, it is important to know that "defining the project", "the complexity of addressing issues related to a site or project" and having a project "stand still" greatly affect the length of time it takes to move a proposed project through the planning process. The Aptos Village project involved complex property title issues, historic structure issues, as well as need for Railroad and CA Public Utilities Commission engagement on complex issues. The process is most effective when the public sector and private sector are actively engaged in addressing issues and meeting time commitments.

Request to add short summaries of long planning documents to the Planning Department's website.

This request will be evaluated. It is agreed that Executive Summaries should be included as feasible within long planning documents.

For a fire recovery victim, there were considerable up front, out-of-pocket expenses for before an insurance claim payment was received. This is not right. The County should try to help disaster victims rebuild, even if some usual practices need to be modified.

The new proposed Nonconforming Ordinance has aspects that should streamline reconstruction after a disaster, allowing for 100% reconstruction with just a building permit for most structures. However, reconstruction of structures within habitat or environmentally constrained areas such as floodplains are subject to greater scrutiny and permit requirements.

Deregulate to support the economy.

It is agreed that less risky, less costly and quicker permitting processes could provide more of an incentive to pursue construction improvements and development projects. This must be balanced with the fact that State laws must be reflected in local laws, and that local community

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values are reflected in local codes. Having said that, it is clear that the Board of Supervisors are supportive of the expressed desire by the public that land use regulations need to be clarified, modernized and allow for streamlined permit processes. That is a major priority of the Planning Department. The Board has also authorized preparation of a countywide Economic Vitality Strategy that will be developed during 2013.

Citizens must be active at the Board of Supervisors level. Regulatory reform will not happen without Board buy-in.

Any and all of the GP/LCP amendments and Code Amendments require final adoption by the County Board of Supervisors, and most also require final approval by the Coastal Commission. Decisions are made at public hearings, during which members of the public are able to provide testimony. Written input is also accepted, which is best transmitted prior to the hearing. The Planning Department encourages broad public involvement, which assists decision-makers with making decisions that continue to reflect community values.

Staff should create records of those things they have advised the public that can be done with their property instead of just recording those things that cannot be done.

Customer service and assistance with problem-solving have been emphasized as expectations of staff.

Empower the Counter staff to make more decisions.

Some types of zoning and building decisions can be made at the counter, however in situations that involve permit processes, decisions cannot be made until the process has been carried out. That process can involve other departments and agencies evaluating development proposals for compliance with their regulations, such as fire department evaluation of access roads and drainage review of plans.

Many old building division policies have been removed or modified to provide staff with more discretion to assist the public to meet code requirements.

Request for clarification of the terms "ministerial" and "discretionary" given by Planning staff.

A "ministerial" permit includes but is not limited to a Building Permit. An application for a building permit is reviewed for compliance with a fixed set of rules or standards. If the proposal meets the standard then a permit is issued. A "discretionary" permit means that the decision about whether or not a permit will be granted involves <u>judgement</u> about whether the proposal is consistent with criteria that are not as clearly defined as ministerial criteria. For example, a building permit determination involves review of whether windows meet the defined requirement for placement on a wall, and a discretionary permit may involve a determination of whether a proposal is consistent with neighborhood character.

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Planning managers need to support staff in order to improve customer service. Managers should be out at the Counter observing more often. Person has noticed the new "mix" at the Counter.

Comment noted; managers are encouraged to spend more time observing counter operations and to be available as appropriate. In Fall 2010, the staffing plan was modified such that all zoning/development review planners have both "counter time" and "project time". Consequently, there are more planners that are staffing the counter, and those planners also process development permit applications.

There was inconsistency in the processing of a commercial application.

The above-described staffing plan allows for greater consistency. For example, if an applicant has communicated with a certain planner at the counter on multiple occasions about a possible project application, and then submits the application, there is now a good prospect that the same planner will be assigned to process the permit application.

Person likes that the application intake planner then becomes the project-processing planner. Inconsistent answers more likely if an applicant has to work with several different planners.

Comment noted. See above.

Person experienced confrontational attitudes at the Counter.

Despite best efforts, confrontational attitudes can occur on both sides of the counter. Land use projects usually involve people's homes, major assets and/or livelihoods, and it can be difficult to understand or want to engage with a regulatory agency charged with explaining and enforcing "the rules". Planning staff are trained to remain professional even during tense or difficult conversations, and staff usually are able to do so. If not, it's best for both sides to take a break and/or obtain management assistance.

A liaison should be provided to assist the public through the planning process.

There are a variety of "liaison" opportunities within the Department. First, there are two managers who co-manage the discretionary development permit process, and if an applicant believes that the staffperson assigned to the project is not providing adequate assistance, then one of those managers should be contacted. The Assistant Director oversees these managers and can also be contacted.

In the Building Division, changes have been made so that each applicant is assigned a Building Counter Permit Technician who assists them through the process from submittal to issuance of the building permit.

As of July 2012, the Planning Department has the county's economic development function within the Department. The Economic Development Coordinator is available to assist economic development projects with negotiating the permit process.

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Also, the Department has expanded public counter hours and staff is available to provide general information and answer questions about land use regulations and permit processes.

Concern about inappropriate political influence on the permit process.

The Planning Department does not currently perceive undue or inappropriate political influence on the jobs, determinations or decisions of the Department.

Employers are leaving the county. Monterey County is friendlier to business.

Now that the Planning Department includes the Economic Development function for the County, there is greater emphasis within the Department on providing assistance to business. The Code Update process is also intended to make it easier for businesses to locate and expand within the unincorporated area.

Person described the negative feeling he experiences coming into the Planning Department, as if he is "in handcuffs." He has not experienced the same feeling when working with staff in the field.

The Department realizes that "attitudes matter". Customer service and assistance with problem-solving have been emphasized as expectations of staff. An inter-departmental "one stop" development services team has been formed and is analyzing and discussing ways to improve the permit review process and customer service within all departments and agencies involved with the development review process.

Also, as of July 2012, the Planning Department has the county's economic development function within the Department. The Economic Development Coordinator is available to assist economic development projects with negotiating the permit process.

The Planning Department is directing the Board of Supervisors rather the other way around. An example is the Building Board of Appeals.

The Planning Department is responsible for developing recommendations that are considered by the Board of Supervisors when the Board is making decisions about changes to land use regulations, land use designations/zoning, or other land use matters. The Department prepares a proposed work program that is approved within each year's budget by the Board.

In most jurisdictions, the City Council or the Board of Supervisors acts as the Building Board of Appeals. Appeals of determinations of the Building Official regarding application of the California Building Code are rare, however the Board sitting as the Board of Appeals is qualified to hear from technical and professional experts, evaluate the information, and make a decision about any appeal. In any government or field, those making final decisions are not necessarily themselves experts in every subject area or regarding all issues that come before them, but are elected or appointed to evaluate information presented by both sides in an appeal situation and make a decision.

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Agency comments are not currently viewable by the public in the new Hansen computer system (as of time of Forum). It is not possible to view or respond to individual reviewing agency comments.

Installation of the new permit tracking computer software is now complete, and applicants may again access agency comments on line.

Staff is not friendly. There are different levels of customer service. Some of the staff have smiles and are more motivated to assist than others.

The Department realizes that "attitudes matter". Customer service and assistance with problem-solving have been emphasized as expectations of staff. Training is being provided.

There is not certainty of processing levels for applications

The Code allows for "elevating" the type of permit process that will be required of a project, but this is rarely employed, and tends to only occur for projects that are considered to be quite controversial. Elevating the processing level can actually end up saving time and money for some applications, as certain "appeal" steps can be eliminated and the application more quickly presented to the final decisionmakers.

Processing times are too long, even for a "priority processing" project.

Customer service and assistance with problem-solving have been emphasized as expectations of staff. An inter-departmental "one stop" development services team has been formed and is analyzing and discussing ways to improve the permit review process and customer service. New routing practices have been implemented and continue to be discussed for refinement. During high levels of development activity, timeframes can get longer than desired. During this lower level of activity, processing times have decreased, even though staffing levels have also significantly decreased. Staff are making every effort to reduce processing times. Submittal of complete and high-quality applications is of great assistance in reducing processing times.

Plan check requirements made by an out-of-area contract plan check company were not consistent with Santa Cruz standards.

At this time, the Department conducts all plan check in-house. If circumstances change or require use of out-of-area plan check consultants, these are overseen by County staff, and if there are any concerns these should be brought to the attention of the Chief Building Official.

The planning process has tripled since the Loma Prieta earthquake even though no lives were lost in houses.

Comment noted; although more specific information would be needed to evaluate this comment, as the Department does not believe that development requirements have increased to that extent if an "apples to apples" comparison is made. However, it is true that many of the

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vacant sites that remain in the County are the more constrained sites that involve greater complexity and review.

There are too many reviewers and re-reviews of plans, which costs more money to involve more reviewers, which at times seems redundant.

Customer service and assistance with problem-solving have been emphasized as expectations of staff. An inter-departmental "one stop" development services team has been formed and is analyzing and discussing ways to improve the permit review process and customer service. New routing practices have been implemented and continue to be discussed for refinement. Protocols have been and continue to be refined to ensure that duplicative or unnecessary reviews and routings do not occur. Counter staff are performing better screening of project plans to assure that the submitted plans are as complete as possible prior to submitting, which can reduce the "re-routing" of plans that are submitted with deficiencies.

The Department of Public Work issues should be addressed, especially those related to drainage.

See above. Public works representatives, including drainage staff, are participating in the "one stop" development services team review effort.

Planning and Public Works Departments tend to work in "silos" without appropriate communication and coordination between the Departments. Until conflicting perspectives are resolved, the applicant is held hostage.

See above. An emphasis of the Planning Department has been to "break down silos" and recognize that development review staff are "on the same team" irregardless of what department or department section the staffpersons works within.

A person did comment on improvement in Planning and Public Works Departments' communications.

Thank you for recognizing our efforts.

Compliment given that a planner did stand by the information given to the public.

Comment noted.

There is a need to better coordinate the County processing of projects that receive their approval at the Coastal Commission.

Planning Department staff and Coastal Commission staff initiated quarterly meetings in 2010. These meetings have been quite helpful in facilitating communication, coordination and collaboration to address common issues and questions between the agencies.

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The Planning Department is not horrible.

Agreed. © We're pretty nice people trying to help administer and assist you to comply with a myriad of code requirements as required by State and County laws.

Quicker application processing helps the economy and job retention.

Agreed that streamlined permit processing reduces risk and expense to applicants.

The Planning Department needs to practice more give and take.

One way of looking at the permit process is that it is actually a negotiation. However, the regulatory standards must be met. Opportunities for "give and take" exist in how permit conditions are worded and structured, or what type of conditions are imposed. Communication and negotiation about those aspects can lead to feasible conditions of approval and "win win" outcomes. Guidance provided to staff is that "every project is not required to get an A+". In other words, determinations of regulatory compliance are possible even if certain aspects of the project "can be found to meet the standard but could be even better". Staff can point out ways to the applicant that the project could be made even better, but do not have the authority to insist on that if the proposal can be found to meet the code standard.

County permit process is too long compared to other jurisdictions. County rezoning application took more than 19 months to process while a General Plan Amendment/rezoning application only took 4 months to process in the City of Watsonville.

As can be assessed by the foregoing responses, it must be recognized that "context and specifics matter". Especially in Santa Cruz County with its environmental constraints, each site and each development proposal tend to involve its own considerations that do not allow for an "apples to apples" comparison. That being said, the Planning Department and its partner agencies involved with development review are implementing streamlining procedures and continue to work on code and process improvement.

Planning Department, on more than one occasion, used wrong accessibility standards resulting in additional costs and delays in projects.

Thank you for bringing this issue to our attention so that the Chief Building Official can review and ensure appropriate training and application of correct standards.

Long processing times have resulted in lost revenue for the County and construction employee layoffs.

Long processing times sometimes intersect with changing economic circumstances, and across the nation many proposed development projects were no longer feasible after the economic downturn that began in 2007/2008. That being said, the Planning Department and its partner agencies involved with development review are implementing streamlining procedures and continue to work on code and process improvement.

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Several people commented on plans being lost by several County Departments.

Comment forwarded to County Departments involved with development review. Over the past three years, this issue does not seem to have attracted attention or complaints filed; so hopefully this phenomenon has been addressed.

Several people commented on the number of sets of blueprints required and their costs of duplication. The County should look into the use of PDFs or CDs instead. Use electronic submittals and only print needed pages or none at all.

The number of blueprints required was established to expedite permit processing so that each reviewer/reviewing agency would have a set of plans. The County's plan consolidation process does allow only changed pages to be re-submitted rather than whole complete sets with the revision. Regarding cost, the labor and materials cost must be met either by outside duplicators/applicants, or by county staff. Presently, the County is not set up to print large pages or to review only electronic submittals, but this will be explored for the future. This approach would require a technological expense and change of practice not only for the County, but applicants. Having said that, the efficiencies and reduction is use of paper are attractive features that will be explored.

A person expressed confusion as to whether to submit requested information to Planning or to the individual Department.

As Planning is the "lead agency" processing development permit applications, it is usually best to submit requested information to the Planning Department, who will ensure that it gets to the appropriate person at the other Department or Agency. Having said that, the applicant may need to directly communicate with these others in order obtain clarity regarding their standards and how to best comply with them.

Plans should not go to multiple individuals in Public Works for review.

The Public Works Department involves multiple disciplines, including but not limited to stormwater drainage, transportation/site circulation, and sanitation/sewer wastewater. Appropriately trained staff must review proposed plans; which is why multiple individuals in the Public Works Department review projects, along with Environmental Health as needed.

Environmental Planning and Public Works Drainage do not coordinate their reviews and inspections.

Greater effort has been and is being made to reduce duplication of effort and to coordinate reviews. A challenge is that the County of Santa Cruz Planning Department is one entity responsible for grading and drainage on private property, but that the Sanitation Districts also have jurisdiction over drainage and wastewater, because what flows from private property enters the public/district facilities.

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Drainage review and approval takes way too long.

Comment noted. Interagency efforts have and are occurring to reduce review times.

Building plan check comments are difficult to understand, even for staff.

Comment noted. The importance of clear plan check comments has been emphasized to staff.

Limited staffing results in plan check delays.

Plan check delays are no longer occurring; the department believes that the level of plan check resources is appropriate for the level of development activity that is occurring.

It takes 4-8 months for a master occupancy permit to be processed for an existing commercial building.

The amount of time needed will vary depending on the site and circumstances, especially whether CEQA environmental review is required. Efforts have been and are being made to reduce permit processing times.

Architectural plans should not be required when a demolition permit involves removing illegal work attached to an existing wall.

We agree with this statement; if this has occurred in the past it should be recognized that this is not a current requirement for demolition permits.

A person has been discouraged by contractors from working with the County and getting permits.

Now that building inspectors are issuing "Stop Work" notices upon observing unpermitted construction that is underway (rather than only doing so if a complaint from the public was received), this practice is less prevalent. The County has also established a "CUREC" fee, which doubles the amount of building fees for unpermitted construction for which a Stop Work notice is posted and a building permit application is later submitted.

The trigger for when a post-discretionary permit approval change becomes a "big deal" is much lower here than in other jurisdictions. Substantial compliance should be considered.

Comment noted. This principle has been communicated to staff and is being incorporated into practices. Substantial compliance is a valid and common principle. A "memo to file" approach can be used to document very minor changes from approved plans that do not conflict with applicable regulations, conditions of approval, environmental mitigations, or the nature of the project itself. If the project itself changes in a notable and more significant manner, then a Minor Variation can be processed administratively if the changes are fairly modest. Minor variations can include some time extensions, as well as modification of the wording or nature of a condition in a way that still accomplishes the intent, but in a different

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way that causes no compliance concerns and is not expected to create any public concerns. A new development permit is usually only necessary if there is a significant change in the type or nature of the project or its conditions.

A person does not like sitting out in the lobby while waiting for Counter service. Feels "walled out." This is not his experience at other Planning Departments.

The physical logistics of the County Building are difficult to modify; however assessment and efforts have been and will be made to try to establish a more welcoming environment.

Concerns about communication and response time, especially for small projects.

We have created new processes as well as an Over The Counter building permit plan check process to facilitate small projects. Also, as stated in many of the other responses provided in this document, there are many efforts underway to improve customer service, emphasize the importance of phone calls, encourage appropriate tone and nature of written communications, help applicants meet their objectives, and to ensure we provide answers for "why?" when a project cannot be approved or must be modified to comply with a regulation. We do have a significantly smaller staff in the Department (40% reduction since 2008), and we are busy processing projects and trying to work to make improvements to the Code, General Plan and so forth, but our core business and top priority is to help applicants with permit applications, even for small projects.

Several people said they do not feel like they are treated as valued clients or customers.

See above. We hope that you have noticed a higher level of customer service, or if you have not been back to the 4th Floor in a while, we hope you will give us another opportunity to assist you. We know that the regulations can seem complex, but we ARE here to help, and we would like to assist you with your next project or with obtaining permits retroactively if you own a structure that involves unpermitted construction.

Provide a clear process map for each type of development.

We have some brochures of this type, and will work on others, particularly after we have completed the major update of the Chapter 13.10 Use Charts, 13.20 Coastal Regulations, and 18.10 Permit Process portions of the County Code.

Provide pre-application services. A person was told that he could not make an appointment for a discussion-only meeting (rather than pre-application) for a potential discretionary project. A person should not have to file an application or pay a fee to talk to a project planner. Other jurisdictions offer a service that brings the reviewing agencies together to review an application and work out issues promptly.

The Department provides free zoning and building information at the public counter, to provide general information and answer questions regarding regulations. This free level of service is provided for counter appointments of 20 to 30 minutes. The Department lobby has computers

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available for use, and the new department website contains a wealth of information that can be accessed by these or any computer. The Records Room is also open to the public and any project files are available for review (older files may need to be retrieved from archives which takes a day or two).

We enjoy helping people with their projects, but it must be recognized that the Department has been directed to maximize "cost recovery", such that if research, or more complex project-specific questions or analysis is requested, staff is supposed to charge by the hour for providing this service. At some level, the service changes from the free "general and regulatory information", to more of "research, analysis and advice" for which a sort of "consulting" or "service fee" is charged. Not all requests for information are "counter type" that are readily answered at the counter appointment, and fees are charged for the more complex types of service due to the direct benefits provided to the customer or potential project applicant.

We try to be reasonable, but the Department does not have sufficient resources to provide the depth of service that some desire, and planners must prioritize their time to processing applications that have already been filed and paid fees. Having said that, one option for some projects might be for an applicant to request to speak with one of the managers of the zoning/planning division, to request a meeting in order to decide whether to place a deposit and submit an item for a pre-application consultation.

Also, we are very pleased that the Department now has an Economic Development Coordinator on staff, who is available free of charge to provide services to potential economic development or business retention/expansion projects.

The County is trying to make better use of the "Development Review Group", which is an inter-departmental/inter-agency group that can meet to discuss and review a set of plans, in order to exchange information and address issues. The DRG meets as needed to review applications that have been filed, and applicants pay "at cost" for time at these meetings. For applications not yet filed, members of the public can place a deposit and request a "Preapplication DRG" meeting, which is also an "at cost" service.

Provide expedited processing for large commercial projects, perhaps for a fee? Consider an express building permit process, like the Cities of Sunnyvale and San Jose.

The Department has expanded use of the "Over The Counter" permit system, and has expanded the hours that the building counter is open to the public.

Expedited processing is at times explicitly authorized by the Board of Supervisors, such as for public benefit projects and affordable housing. -In the future, staff may develop guidelines for consideration by the Board of Supervisors, addressing what types of projects are eligible for priority processing, and at what additional charge.

Several people want a project manager or single point of contact that is responsible and has the authority to see an application to completion and answer questions. Sacramento has a good system in place.

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Once an application is filed, the Planning Department does assign one planner to the project, who is encouraged to assist the applicant in communications with other departments or agencies as needed, and to assist the applicant with identifying methods to modify a project to meet code standards. However, it should be recognized that it is very important for the applicant to take an active role in preparing and submitting a project that recognizes county regulations. We recognize that the variety of codes that affect a project are complex and at times seem to overlap or be in conflict, and planners are encouraged to become knowledgeable of all aspects of the project review process, even those of other agencies. Inter-departmental cross training is underway, so that staff have a working knowledge of the process from start to final. Until additional resources are identified to hire an "ombudsman" or "development services manager" that has authority across departments, it is best to work with the planner, and with department managers as needed.

Have the discretionary permit intake planner also be the planner who processes the application.

Prior to Fall 2010, the Department was organized such that planners who staffed the counter did not work on processing project applications, and vice versa. This approach seemed to have been employed when development activity in the County was very high, and thus counter specialists and project planner specialists were designated. While it may have allowed for a certain level of efficiency, this approach did have the effect of not allowing the counter or intake planner to also be the one who processed the application. With the current staffing arrangement, this is no longer the case.

Provide clear and reliable estimates for processing times.

We recognize that time is very important for applicants, and we do attempt to provide good estimates. However, there are so many variables involved that it can be difficult. Some sites have a high level of environmental constraints, which is sometimes not fully understood before the application is submitted. This can cause more complex and lengthy environmental review processes. The quality of the plans themselves strongly influences processing times, as well as how responsive applicants are in getting additional information or revisions back to the Department after initial completeness review or the first plan check.

Continue to provide priority processing for change orders, no matter the number requested.

Every effort is made to process a change order quickly, as usually the project is already under construction and the change can be evaluated fairly quickly.

Change orders to issued building permits should be charged "by the hour."

The Building Official has some discretion to determine the most appropriate method of charging fees; change orders are usually a flat rate or based on valuation; by the hour is also a method that may be appropriate in certain circumstances.

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Allow "deferred submittals" such as fire sprinklers to move forward in processing with other change orders.

The Building Official is currently evaluating this suggestion.

Make reviewers' comments on discretionary permit applications available on-line, similar to building application comments that are currently available.

This comment will be considered. Not all comments are public at the time made, as sometimes the project planner needs to refine or revise the comment in order to reflect other analysis, or due to nexus and proportionality concerns, or because the project is changing and the comment will change. Because the discretionary permit process involves more judgment and balancing, it is not always helpful to release all comments when they are written, which is why planners collect the comments and then prepare documents such as the 30-day completeness letter which enables refinement of comments as may be needed.

Make old permits/plans available for viewing on-line.

Some more recent "old" plans may be reviewed on line, as reduced versions of the plans are usually attached to the staff report, and staff reports are archived on the Department's website, categorized by the Agenda type, i.e. Zoning Administrator, Planning Commission or Board of Supervisors. To access plans this way, one must know the date that the public meeting occurred. Hard copies of old permits and plans, to the extent that the County has them, can be obtained by visiting the Records Room.

Planning Department should institute a 24-hour call back policy for telephone calls.

This type of good customer service standard has been discussed with staff, who try to return calls on the same day. Due to meetings, counter duty and other work this is not always possible, but staff does try to be responsive to calls and emails.

County Departments need to "take a risk" (look at the intent of the Code) with the applicants, while also providing more certainty. Give planners the freedom to make a mistake.

The intent of the code is very important, and does guide interpretations and application of the code to proposed development projects. Finding the balance between certainty, which can sometimes lead to "black and white" rigidity; and risk/freedom which can sometimes lead to "inconsistency" is a delicate exercise. The Department is guided by the content and intent of the code, applied to the specifics of the proposed outcomes of a project.

Scale the amount of review to the scope of the project.

This principle is reflected in the existing codes; especially through the new Minor Exceptions, Height Exceptions and Administrative Coastal Permit processes. The code update will examine other opportunities to further ensure that smaller and more straightforward projects can be processed through a more simple and straightforward procedure.

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Provide professionals and the public with information about new requirements and regulations.

Information is provided on the Department's website, and we have held certain training sessions for the public regarding new regulations, such as the Non-conforming Ordinance and the Water Efficient Landscaping Ordinance. We post fliers at the Counter, provide handouts, and hold public outreach meetings prior to the adoption of new code regulations.

There should be consistent understanding of regulations and processing amongst staff.

Training and cross-training is being provided. Staff have section meetings to discuss questions about how to interpret or apply codes.

Invite the applicant to participate in the post-application submittal Development Review Group discussions.

Applicants may request to attend the DRG meetings, and it can be very helpful to have the applicant at the meeting available to answer questions and respond to suggestions to consider plan modifications in order to better comply with applicable regulations.

There needs to be clearer distinctions between "incomplete" items and policy issues for discretionary permit application comments.

Comment noted. Staff is evaluating the content of the 30-day letters, with the objective of emphasizing the requirement to identify information needed to make the application complete. Policy issues should generally be only highlighted if significant policy concerns are noted and it would be helpful for the applicant to know these so that the project might be modified. However, staff has been encouraged to NOT include policy analysis in these letters, as that is what the permit process that occurs after the 30 day completeness letter is for.

A person remembers the Applicant's Bill of Rights and wonders if our practices are consistent with that document.

The principles of the Applicant's Bill of Rights are still valid and the departments recognize them.

Person expressed concern that SB 375 (greenhouse gas emissions) implementation may hinder faster processing and regulatory simplification efforts.

The Planning Department has completed a Climate Action Strategy CAS) that the Board of Supervisors adopted on February 26, 2013. At this time, it is not anticipated that implementation of the CAS will have significant near-term impacts on permit processing.

The Board of Supervisors should let the Planning Department do their job.

Comment noted. This has not been observed to be a major issue by Planning staff.

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It is difficult for the public to find time to attend daytime meetings and hearings. Evening meetings preferred.

Comment noted. It is not likely that regular meeting times for Planning Commission and Board of Supervisors meeting will be changed to evening meetings, however the Planning Department has scheduled evening meetings for key projects and key planning activities, in order to maximize opportunity for public participation. Members of the public who cannot attend meetings are encouraged to send letter, email, or call with their input or concerns.

There is a need to better integrate the continual need to upgrade buildings and uses with the regulatory process.

The new Nonconforming Uses and Structures Ordinance is more accommodating of retaining and improving existing legal nonconforming structures, especially for non-residential. Other code amendments also support the objective of this comment.

Changing tenants in a commercial building should be a simple process.

Staff has worked to clarify this process, currently known as the "Level 1 Change of Use Permit", and believes that is has improved. Future code amendments may allow for further improvement.

Currently, changing use, in especially older shopping centers, is a lengthy process. Accessibility requirements are difficult to meet. This results in some people not obtaining required permits. The group needs to understand that ADA and accessibility challenges may not be able to be solved locally.

See above. Also, parking regulations have been amended to create opportunity to change uses or change parking lots at existing sites and NOT need to increase parking supply, if the increased parking requirement or change in parking supply is 2 spaces or less. Also, greater flexibility can be achieved through broadened "shared parking" and "transportation demand management" strategies that can result in a reduction in the number of parking spaces required at a site.

The new 2013 California Building Codes (to be adopted for use in the County of Santa Cruz in January 2014) aligns state accessibility codes with the Americans with Disabilities Act (ADA) federal requirements. This will help alleviate issues due to differences between California and federal regulations.

Planning Department Building Section does not allow for pre-submittal meetings for applicants with plan check staff to discuss and understand assumptions and approach.

The Building Section now has greater availability of plan check staff at the building counter who are able to meet with applicants and discuss questions. Plan check staff can also be reached via email; email addresses are available in the contact information on our website.

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In Redwood City, a Gantt chart was used to lay out the application process. Heavy use of email expedited the application process.

For large projects, such an approach could be taken. We are open to discussing this with applicants.

Expedite the permit process; for example: over \$300,000,000 for the Cybertran light rail loop from UCSC to the Boardwalk to downtown Santa Cruz to Harvey West and back to UCSC! (At no cost to Santa Cruz or Santa Cruz County) went away when the investors found out that the permitting process would take significantly more than 5 years. The money was immediately available (lots of jobs!).

Comment noted. There may have been additional factors beyond county land use permits that resulted in this project not going forward, and staff cannot recall such a project being proposed locally.

Allow common sense to prevail.

The Department is cognizant that "levels of enforcement" may vary, such that minor code compliance cases are assigned lesser priority than those that involve more significant code violations that threaten public health and safety.

Person expressed concern about the protection of private property rights.

Comment noted. Underlying all of the county's land use regulations is the U.S. Constitution and certain federal laws, as well as State of California regulations such as the "Planning, Zoning and Development Law", "Coastal Act", "California Environmental Quality Act (CEQA)", and the "Subdivision Map Act". The County Code must be consistent with these laws, many of which are designed to ensure protection of private property rights as well as protection of public rights, values and the environment.

It takes too long to get the average permit to build anything. My most recent experience with this was when it took me $2\frac{1}{2}$ years to get a permit to build a garage for an existing house in a neighborhood with paved streets in Bonny Doon.

Without knowing more about the circumstances of the project, it is difficult to comment.

Our county has too many different fire districts and there is little or no apparent coordination with the fire officials and the planning department. This causes innumerable issues that could be avoided with a uniform set of rules and better communication between the County and the Local Fire Departments.

Comment noted. There is a monthly meeting of fire district officials, which the Building Official attends, which is one of the methods used to discuss issues and strive for consistency.

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The different agencies in the County Building need to communicate and share information better. Fire, Public Works, Environmental Health, the Assessor, GIS, Building and Planning all need to share information in a system that is accessible to the public on line.

The County started using a new permit tracking system in 2010/11, which all agencies use to share and log information and comments. The system will undergo a major update in 2013/14 as the vendor is releasing a new format, and we hope to see improvements in functionality.

The people that interact with the public at the Planning and Building counters need to be trained so that they can tell someone all the possible issues that affect their property. I don't know how many times I've come in to do research on a new project, been told something and come back with a design in response to the info only to be told that there is some other rule that contradicts or is in addition to the other rule. This may entail a simplification of the Planning code.

Training is on-going, and planners do try to convey what can reasonably be known about a piece of property or about the regulations that may come into play with a project. However, at the counter the planner may not be looking at plans, no environmental review has occurred, and other agency review has not occurred. Sometimes projects change, or new information is revealed by an applicant that was not addressed or understood in the first meeting.

The Department's new website, as well as the County's adoption of the Re-codification of the County Code, is hopefully much more helpful in providing information and in ensuring confidence on both sides of the counter that we are using the current version of the Code.

The Discretionary Process is like having your project before a secret tribunal. There needs to be more transparency.

Applicants are encouraged to initiate communication with the planner assigned to the project. If there are concerns about lack of transparency, the applicant can request to meet with a section manager.

People need to be able to call the Planning and Building Department and get a live human to ask a question during business hours every workday, not a message machine and a call back, maybe tomorrow.

There is always a staffperson answering the general department phone number when the Planning Department is at work, except for between 12 noon and 1 PM for the lunch break. There are back-up staff as well, but due to call volume you may get voicemail. The zoning line takes voicemail questions and planners return those calls the same afternoon. A zoning planner staffs the phone line between 1 and 4 PM each day.

The whole planning process is a giant waste of paper. More of the process needs to be done electronically on line. Technology exists to be able to scan a set of plans into the County System at intake and all agencies would have instant access to them that day.

This practice will be evaluated by the Inter-departmental "One Stop" services team.

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Fees and Costs

Need to be able to build with out-of-pocket funds. Fees are too high, and constrain the amount of money people are left with to actually carry out the project. The graph from the PowerPoint presentation illustrating building permit associated fee seems inaccurate.

Comment noted. The graph is being revised for more accurate and more current figures. Also, the new Planning Department website contains a "Fee Estimator" tool that will assist owners and applicants with "up front" information about the likely extent of fees for a proposed project.

There is over regulation. For example, sprinkler fees are too high. T-1-11 should be an acceptable building material.

T-111 is usually an acceptable building material, although not in high fire hazard areas. Also, it is possible that in special situations where a project is subject to special design review it may be discouraged. In high fire hazard areas, there are many materials to choose from and one of these is a non-combustible "T-111 like" material.

Expensive fees result in larger, more expensive houses.

Comment noted. The Department must recover costs, and those who benefit from the permit process are required to pay those costs.

Current ordinances, policies and practices are resulting in high, increasing development costs.

As reviewed throughout this document, efforts are being made in many ways to adopt new or modified codes or procedures that will make the project review process more streamlined and less costly.

There are at-cost contract invoice errors.

Errors should be called to the attention of either the project planner or department fiscal staff.

Processing costs for a particular >1,000 square foot accessory structure discretionary permit were too high. Too many hours (and thereby cost) charged for particular tasks performed by staff.

Comment noted. Staff is encouraged to work efficiently and not undertake unnecessary analysis or write unnecessarily lengthy staff reports, especially for straightforward and non-controversial projects.

Why are fees for urban single-family dwellings higher than those for rural ones?

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The cost of a septic system is not reflected, and currently rural development is not subject to paying impact fees such as traffic impact fees.

Consulting costs are much greater than permit fees.

Depending on the nature of the project, that can be true.

The consequences of over-regulation (such as soils reports for too many types of projects) are overbuilding and overdesign, which has the ripple effect of resulting in increased costs.

The current Building Code and other ordinances do offer more flexibility for staff to make a determination about whether or not a soils report is required. The Planning Department has undertaken a phased update of the Zoning Code/Planning/Environmental Regulations, with many objectives as discussed in this document. One of those objectives is to ensure we are not over regulating, which as the commenter notes does drive up the cost of housing and commercial structures and makes improvements less feasible.

Permit fee calculation is difficult and amounts can sometimes change. Most businesses cannot cut same day checks. Allow use of credit cards.

If there are issues regarding a fee calculations, an applicant may request review by the Supervising Building Counter staffperson or another manager. The Department desires to be able to accept credit cards and has identified a vendor who can provide that service to the County. However, first our computer system must be modified, which is being planned for Fiscal Year 2013/14. Once we do accept credit cards, any surchange imposed by the credit card company (usually 2-3%) will be added to the cost of the county permit, as there is no other source of funds to pay that surcharge.

Reduction in processing time and cost will result in a better community. "Red Tape" contributes to a substantial percentage of the cost of a project. Permit fees in Vermont are about 1/3 of the cost in Santa Cruz County.

Comment noted. We continue to work on modernizing, clarifying and streamlining codes and the regulatory process.

Be more discerning about where and when to require biotic, geologic reports, etc.

The geologic hazards ordinance was amended to allow for greater flexibility for when to require geologic assessments or geologic studies. The County has received a grant from the State to prepare a more comprehensive update of its Geologic Hazards Ordinance and General Plan Safety Element, which will be occurring in 2013/14. There is some discretion about when to require biotic reports in the current code; if a requirement for such seems unreasonable, then an applicant should contact a manager in the department for review of the situation.

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Measure J ideals of growth management and agricultural protection have evolved into "building is a crime", high costs and fines. Building is not a cancer. The overall cost of housing is driven up by the extensive process and requirements, which are not always necessary.

Comment noted, and certainly we agree that the General Plan and County Code DO allow for building and development. We are working on moderning, clarifying and streamlining the code, and have made significant progress. We are also emphasizing customer service and providing assistance to applicants so that builders can meet their objectives in a timely manner with a project that complies with applicable regulations.

Fees are too high for Second Units. A particular permit cost \$20,000 in fees, and fire requirements are particularly expensive. This leads to non-permitted alternatives.

The Department undertook certain efforts in the past to make Second Units more feasible, but perhaps there is more that can be done. Given current work program priorities and the level of staff resources, more analysis of possibilities will likely occur in 2014/15 when the Housing Element Update process is underway.

It is cheaper to buy a house than to build it.

Several people stated that the current cost of permitting and construction now exceeds the assessed value of the project. Capital improvement fees cost \$20-\$30 per square foot of building.

In recent economic times, it is especially true that it can be less expensive to buy an existing home or structure than to build it new. New developments are considered to create new demands on infrastructure, and impact fees are charged. Impact fees are one of the major sources of revenue for public agencies to be able to provide infrastructure improvements.

Several people said that the fees are too high. The hourly rate you charge for "at cost" permits processing is an insult to most of the professionals who practice in the county. You should not be charging me \$160/hour to review the report of a Civil Engineer that only cost me \$120/hour. Planning staff at-cost hourly rates are too high when compared to other professions' billing rates. The current hourly staff rate for at-cost projects is too high for non-professional reviews.

As stated earlier in this document, the Planning Department is required to set its fees at a "cost recovery" rate. Unfortunately, the county must include within the "overhead" component of fees all of the costs associated with not only staff and benefits, but our share of liability insurance, the department's share of County Counsel, County Administrative Office, General Services, Fleet (car/trucks), Building Maintenance, Information Services (computers, phones, internet), and other costs. While the County does have a somewhat high overhead, the rate charged is within range of rates charged by private land use and professional consultants, and is also within range of rates charged by other jurisdictions.

We have lowered the level of management costs incorporated into rates, and in fact were able to lower certain rates and keep other rates stable in 2012. We will continue to strive to lower the cost of delivering permit processing services to county property owners.

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Code Compliance; Construction Legalization and "Amnesty"

The level of code enforcement is not always equal to the degree of noncompliance.

Comment noted. The code compliance program has changed its approach, and no longer systematically records all unresolved Notices of Violations after a certain time period elapses. Program staff do employ a variety of methods, from a simple "did you know you are violating a code" courtesy notice, to the more complex inter-agency "task force" type of activity to abate dangerous properties housing drug offenders with a variety of nuisance and illegal factors.

Red tags and Notices of Violation recorded on the titles of properties lower property values and constrain loan sources. It then is difficult to obtain financing to address violations, to refinance, and to sell property. Red tags therefore should not be used for all types of red tags, and should be a consequence of not addressing a violation, not an automatic practice for all code violations.

Comment noted. We have changed the approach in recognition of these factors, and are currently only recording red tags or Notices of Violations as a consequence of the violator not acting in good faith or in a reasonably timely way to resolve the violation.

Concerns expressed about the handling of a specific code compliance case in the Larkin Valley area, related to homeowner's effort to re-build after the Trabing Fire, which ended up being a habitat code compliance case which cost much time and money.

We are sorry for your loss and recognize your frustration. The new non-conforming use ordinance may now better address certain of the issues faced by this property owner, as the code now makes reconstruction after a disaster more straightforward. However, reconstruction in a habitat area is always more complex, and owners are advised to engage with environmental staff as early as possible so that a mutual understanding can be achieved regarding the area of the disaster and where reconstruction activity will be occurring, as well as areas of habitat that should not be disturbed.

Support for an amnesty program. One reason for not obtaining permits is the lengthy, confusing, sometimes far-reaching planning process, permit fees, and impact fees: too much time, risk and money so people build without permits. Also, the previous amnesty program failed due to lack of trust by the public.

The Planning Department and its partner agencies have been discussing how an "amnesty" or "construction legalization" program might be structured and offered to the public. We have reviewed the program that had been offered about ten years ago, which was not particularly well subscribed. The Department has not yet promoted a construction legalization program because of a belief that a program will be more successful once a variety of code amendments and policy/practice changes had been made. We don't want to invite people in to submit their

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applications, only to have them not be able to succeed in legalizing structures that we believe should be acceptable, but for which the codes still did not accommodate acceptance. This is a complex matter that we hope to review with the Board of Supervisors in 2013.

Eliminate old red tags and start afresh. Amnesty for non-health and safety red tags.

It is not possible to entirely eliminate all old red tags. The Department does have some discretion over how it uses its limited code compliance resources (3 officers), and tries to focus on the more significant cases. There is an "expungement" process available through the Department, with the opportunity that the Department would agree to expunge certain recorded notices of violation from the recorded deed/title. We are aware that recorded red tags can make financing or re-financing a property more difficult, and at times we can agree to expunge the notice from the title. However, certain violations are so significant that it is in the public interest that title to the property contain a declaration or notice of the violation, so that any potential future buyer of the property is aware of the violation.

Red tag fees are not fair. Concern that the County hired the code compliance Hearing Officer.

Red tags in the form of a "Notice of Violation" are no longer being recorded on title in a systematic way after a certain number of days or weeks after posting the red tag or Notice of Violation. Instead, a recorded notice on the title report of a property only occurs as a consequence of longer-term lack of good-faith effort or progress in resolving a violation.

Red tags in the form of "Stop Work" notices are posted, usually by building inspectors out in the field when they discover unpermitted construction underway.

People have lost homes due to code penalties.

We strongly encourage NOT working on or constructing buildings without permits. The consequences of doing so can be severe. A high-risk activity such as building a home in a location without approved access, septic or other required systems, and without inspections to ensure safety of structural, electrical, plumbing and other systems, can result in a situation where an existing building simply cannot be legalized, even after the violator decides to spend money on attorneys and court challenges. The violator is usually responsible for county costs of addressing the violation, in addition to their own costs.

Protest hearings for determining validity of alleged code violations lacks appropriate proof by evidence process.

Hearing procedures have been developed in compliance with applicable laws; if there is any question or concern about the county's procedures then it is suggested that either the County Counsel's Office or the County Administrator's Office be contacted.

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Do not like that code compliance is driven by anonymous citizen complaints. Could these be fakes? Concern expressed that code enforcement is complaint driven. The property owner with the violation may target the complainant. This serves as a disincentive to turn in a complaint.

The Planning Department employs three code compliance officers, which is a significant reduction from years past. The Code Compliance function must prioritize its efforts, and one way this is done is to rely on members of the public to decide that a violation is significant enough that they are going to file a complaint. However, the Department will also undertake pro-active code enforcement (not wait for a complaint) in situations of observed dangerous conditions, or where unpermitted construction activity is observed to be underway, when a Stop Work notice will be posted. The consequence of receiving a Stop Work notice is that the CUREC fees are charged, which is 100% (double fees) of the plan check, processing, inspection and grading fees that would normally be charged.

In a certain instance, the Administrative Hearing Officer recused him/herself and that resulted in an unresolved code case. The Hearing Officer should be a State officer and not a paid County staff person.

The State does not provide this type of resource to the County. The County Administrator's Office (CAO) hires the Hearing Officer and administers the contract, not the Planning Department. If an Officer recuses, then another Officer will be assigned.

Reactivate the previous Building Board of Appeals and activate a Housing Appeals Board. There should be peer review on these Boards.

Comment noted, however it should be stated that the Planning Department does not agree with the comment.

Concern expressed that an unpermitted driveway violation did not receive appropriate attention from a former Planning Director.

Comment noted. No specific information was provided, therefore no specific response can be made. However, as stated above, due to limited code enforcement resources, the Department does need to make decisions about which violations to pursue and which to pursue more strongly than others. Our policy is to try to focus on the more significant violations.

Need better enforcement efforts.

See above.

There is a property at the end of Zayante Road with an illegal addition which is causing a parking/traffic issue with fire trucks unable to access site.

Complaint filed.

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Code complainants are concerned about retribution by neighbors. The County should take the initiative to take on certain code cases rather than only react to complaints.

Names of complainants remain confidential; although names may end up revealed if a case goes all the way to court action (which is relatively rare). However, we understand that even if we keep the name confidential, it is common for violators to "guess" or to "assume" who the complainant is, and particularly in lower-density rural areas, neighbors are concerned about possible retribution. One alternative in this type of situation is to work through your district's County Supervisor, who may be willing to initiate action from the Supervisor's office rather than the citizen being required to file the complaint. Also, if the case involves dangerous, severe life/safety circumstances or criminal activity, it can also be an alternative to report the situation to the Environmental Health Department or the Sheriff's Office. The Planning Department policy has been to not act on anonymous complaints, but if something is threatening life or safety then a communication should be made and we will evaluate the situation.

Allow grandfathered uses.

The County does "grandfather in" existing legal non-conforming uses and structures. Also, the new Non-Conforming Uses and Structures Ordinance much better accommodates work on and improvements to existing non-conforming structures. This is especially true for commercial buildings, which in the past could only repair and maintain legal non-conforming structures but could not improve or add onto them.

Miscellaneous

Would like community forums to include Public Works and Coastal Commission staff. Those agencies have key roles and requirements for many development projects.

The Forum held with the Business Council included Public Works staff; although no forums to date have included Coastal Commission staff. However, all of these comments have been shared, as well as this response document.

Please transcribe these comments and make them available to attendees.

This document accomplishes that request.

Post upcoming Board of Supervisors hearing notices on regulatory reform efforts at the front Counter or in the Planning lobby.

The new Department website better enables such publicity; the Department also maintains an email list of persons interested in receiving notice of such efforts. Notices are also posted on the Planning Lobby/4th Floor bulletin board.

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There should be a "grandfather" clause in proposed vacation rental regulations.

The adopted vacation rental regulations do grandfather in existing vacation rentals, as long as the vacation rental permit is obtained in a timely fashion as provided in the ordinance.

The Board of Supervisors serves groups other than their constituents

Comment noted.

The Planning Commissioners should not be political appointees.

Comment noted. Each member of the Board of Supervisors is able to recommend a Planning Commissioner, and the Board as a whole must vote to approve these appointments.

At the Webb Ranch, very old buildings withstood the Loma Prieta earthquake while modern buildings did not.

Wooden structures are able to flex and usually remain standing during an earthquake, although they may be damaged. The soil type at a given location, as well as type of earthquake and the seismic waves it generates, greatly influence the level of stresses on a structure during an earthquake.

The quality of consultants in the community is poor.

Comment noted. This is recognized as an opinion of the person making the comment.

Does not like that Redevelopment Agency (RDA) and Housing are paid for by taxes and grants that are unwillingly funded by the taxpayers. Grant money comes with unwanted strings attached.

As of February 2012, Redevelopment Agencies in California are in the process of being dissolved. With regard to grants, the Board of Supervisors must approve any actions taken by staff to apply for grants. Thus, the Board determines whether the benefits of the grant are worth the "cost" of any strings attached before the grant application is submitted.

Concerns expressed about the United Nations, Agenda 21 and foreign entities' influence on local government.

Comment noted, although not shared by the Planning Department. The public review processes that are employed by and required by law are intended to allow local citizens to engage and influence land use policy and development decisions. The system of public notice, public hearings, appeal rights, and representative democracy means that many of these decisions ultimately rest with officials elected by the public to represent the interests of the public.