

Town of Nantucket
Planning & Land Use Services Department
Operational and Staffing Review

May 2019



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May 7, 2019

C. Elizabeth Gibson
Town Manager
Town of Nantucket
16 Broad Street
Nantucket, MA 02554

Dear Ms. Gibson:

We are pleased to provide you with this project report of the Operational and Staffing Review of the Planning and Land Use Services (PLUS) Department. This report includes recommendations designed to improve the overall effectiveness and efficiency of the Department's processes, procedures, and management.

The recommendations contained in this report are based on input and information provided by PLUS staff and external stakeholders, as well as identified industry standards, best practices that are appropriate for the Town of Nantucket, and our independent research and analysis.

The Town is fortunate to have dedicated employees who are responsive, accessible, and provide a high level of customer service to the community they serve. We are confident that these recommendations can serve as a framework for improving operational performance in PLUS. Implementing these recommendations will require careful coordination and attention from the Department's leadership team as well as support from Town administration.

We appreciated the opportunity to review the report with Town Administration, PLUS Leadership, and members of the Planning Board and NPEDC who took the time to review and respond to the initial draft. We look forward to conversations with you about how these recommendations will positively impact Planning and Land Use Services. Thank you for the opportunity to work with the Town of Nantucket on this project.

Sincerely,

Julia D. Novak
President

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Executive Summary

Nantucket's island charm, unique character, and personality are evident in the community's well-preserved architecture, conservation areas, and beaches. The Island is steeped in history. Its architecture was influenced by the first English settlement in 1659, a Quaker settlement during the 18th century, and the affluence generated from the whaling industry. Nantucket is home to Brant Point, the country's second oldest lighthouse (built in 1746) and was the former whaling center of the world. In 1966, the U.S. Department of the Interior designated the Town a National Historic District, followed by the entire island in 1972.

Nantucket is home to more than 11,000 year-round residents, and the Town's tourism industry generates an estimated 50,000 seasonal residents each summer. The Town of Nantucket provides a wide array of essential services, from public safety to roadway and beach maintenance to natural resources conservation to planning and building permitting services. The Town government functions as both a town and a county, with members of the Town of Nantucket Select Board serving ex officio as Nantucket County Commissioners.

One of the important challenges for Town leadership is to balance the needs of a diverse community that includes year-round and seasonal residents as well as tourists, while also striving to preserve Nantucket's history and character. The Town's planning and building functions have played critical roles in guiding the community as it has grown, and they have ensured that development is safe as well as built in accordance with all zoning and building codes.

Since 1978, the Island's planning functions have been led by the Nantucket Planning and Economic Development Commission (NPEDC). The NPEDC operates as Nantucket's Regional Planning Agency (RPA) and is authorized by the State¹ to oversee local and regional planning functions, managing the Director of Planning and providing informal staff support to the Planning Board and generalized assistance to Town Administration on a wide variety of issues. Building and inspection functions are part of the Town's municipal operations and under the purview of Town Administration.

In an effort to better coordinate planning and building activity on the Island, the Planning and Land Use Services (PLUS) Department was formed in 2012 through a Memorandum of Agreement (MOA) between the Town and the NPEDC. Today, PLUS is responsible for assisting applicants through the development review process and ensuring development complies with Town codes and land use plans while also preserving and maintaining the community's unique character and carefully-preserved historic appeal.

The consolidation of PLUS functions has led to positive changes for the customers of the Department. This has included additional administrative staff to assist with intake and questions, having planning and building staff co-located in one office, and centrally housing all planning and building project files. In addition, Department leadership has been focused on improving customer service and holding staff accountable to expected timeframes throughout the entire development review process.

The purpose of this report is to build on those questions and address the scope of work provided in the Town's 2018 Request for Proposal. While the focus is on making recommendations to further strengthen

¹ Chapter 561 of the Acts of 1973 as amended. The adoption of the Town Charter in 1996 and as amended in 2002 clarified and defined Town Administration departments to include the Zoning Board of Appeals, Historic District Commission, and Planning Board.

PLUS Operations, it should be stated that PLUS Leadership has worked diligently to improve the culture and accountability of staff since taking over responsibility for these functions in 2012. Process improvement is a quest, and the Department will continue to face challenges as it strives to become even more operationally effective and efficient. These challenges are not unusual for organizations experiencing structural changes. It is important to recognize that many of the functions and activities currently in PLUS were originally separate divisions and departments. This type of consolidation requires an evaluation of existing processes and procedures to determine what changes are necessary to ensure processes are streamlined. Current challenges include staffing changes, reliance on manual processes, and managing multiple application and inspection processes. Also, the Department continues to balance the needs of its applicants while implementing policy direction from Town leadership such as the Select Board, NPEDC, Planning Board, and Historic District Commission.

The Scope of Work included in the Town's RFP included the following tasks:

- A. Commence the assessment during the summer of 2018 in order to harvest data to compare to off-season. The Town would prefer this study to commence during the summer season in order to compare the workload to the off-season. However, the consultant does not have to begin during the peak season but definitely before mid-August.
- B. Review PLUS department missions, goals and objectives, and workloads and create a department profile of each function to include how each is organized, staffed, and managed and how success is measured by each. Suggest adjustments, where appropriate, and propose if alternative plans should be considered for each department to accurately deliver services.
- C. Analyze workflows, procedures, and department operations to determine the current performance of the services provided to both internal and external customers; identify key strengths of the department and specific opportunities for cost reductions, efficiencies, and organizational structure changes; evaluate overall department structure, supervisor, and staffing levels, and department scheduling to determine workload optimization (operational efficiencies); span of control; and alignment of divisional employees.
- D. Review existing Memorandum of Agreement and operational structure to review operational effectiveness and make recommendations accordingly.
- E. Interview Planning Board, Select Board members and other Town officials, PLUS staff, and other identified parties to gather accurate and up-to-date information. The Town does not have a desired number of focus groups but supports the Contractor providing as many as necessary to obtain the data and feedback necessary.
- F. Solicit contractor/builder and other end-user needs assessments through various methods including online surveys, forums, social groups or other methods.
- G. Review support resources such as technology, consultant contracts, Town committees, commissions, and boards. The PLUS Department uses the following technology:
 - GeoTMS for permit tracking (phasing into EnerGov)
 - MS Office (Access, Excel, Outlook, Word)

The Town has purchased the following EnerGov modules:

- Citizen Access Portal
- e-Reviews
- ESRI Integration
- iG Workforce Mobile
- Intelligent Objects

- Permits and Inspections
- Professional Licensing

The implementation of EnerGov will occur after this study. Although the Town has been working on implementation of an e-permitting solution for several years, we have not been able to fully implement the program. Ideally, this study will identify critical aspects of online permitting that will inform the EnerGov implementation.

- H. Compare PLUS organizational structure and staffing with comparable Towns, or where appropriate small cities, to develop an inventory of best management and service practices. The Town does not have a desired number of comparable towns or small cities and looks to the Contractor to identify appropriate ones.
- I. Develop a plan and corresponding implementation strategy for identified recommendations.

This review is intended to provide Town and PLUS leadership with recommendations to improve the overall effectiveness and efficiency of the Department’s processes, procedures, and management. During this review, several stakeholders were engaged and shared feedback about the Department. While stakeholders generally expressed appreciation for PLUS staff, there was a desire for PLUS processes to be streamlined and easier to understand and to facilitate more communication between PLUS and the applicant during the review process.

The recommendations in this report provide Town and PLUS leadership with a foundation for addressing current challenges within the Department. The recommendations include a mixture of process, management, and technology changes which, when fully implemented, will position the Department to operate more effectively and provide a higher level of customer service. In addition, the report raises questions about the structure of governance in response to item H of the Scope of Work that seem worthy of conversation and exploration. The following table includes the recommendations discussed in this report.

Table 1: Summary of Recommendations in this Report

Number	Recommendation Title
Management	
1	Continue to strengthen the relationship between the Town Manager and the Director of Planning as the Town lives into the 2012 Memorandum of Agreement between the Town and NPEDC.
2	Continue to consolidate the Town’s environmental and sustainability functions.
Development Review	
3	Establish a Development Review Team to be chaired by an Assistant Town Manager.
4	Provide guidance to the Boards and Commissions in an effort to clarify the development process.
Technology	
5	Enhance the availability of development process information for applicants.
Process Improvements	
6	Clarify the application intake, application review, and inspection scheduling processes.
7	Develop an administrative approval process for routine HDC requests.
Code Compliance	
8	Develop formal processes and strategies for ensuring zoning compliance with all conditions of approval.

Number	Recommendation Title
Staffing	
9	Ensure that cross-training exists for the Safety and Code Compliance Division.
Communication	
10	Conduct regular Department and Division-wide staff meetings.
Governance and Structure	
11	Evaluate alternate structures for the Town’s regional planning authority.

Background and Methodology

In June 2018, the Town of Nantucket engaged The Novak Consulting Group to conduct a staffing analysis of all Town departments (excluding Schools, Airport, Water, and Our Island Home). The intent of the study was to determine whether the Town was structured and staffed to deliver the services necessary to maintain a safe, vibrant, and healthy year-round community.

The Staffing Study identified over 100 recommendations for the Town to consider. The final report included recommendations impacting Town-wide operations as well as department-specific issues. The recommendations for the PLUS Department largely focused on staffing needs, administrative processes and procedures, and technology improvements. While the Staffing Study recommended several strategies for addressing these issues, the scope of the study did not allow for a detailed analysis of the Department's operations and practices or solicitation of input from PLUS stakeholders. Recommendations in the Staffing Study include the following:

PLUS Recommendations

- Restructure the Building Commissioner position to include more responsibility for code enforcement issues.
- Fund and fill the vacant Senior Planner position.
- Track workload metrics to evaluate future staffing needs.
- Cross-train Inspectors for zoning enforcement.
- Establish a schedule to appropriately support front counter operations.
- Reconfigure the office layout to separate the staff area and the public entrance.
- Document existing administrative procedures.
- Develop a formal program to cross-train administrative staff.
- Develop a standardized process for scheduling inspections.
- File all inspection and plan review data in a centralized database.
- Implement EnerGov™ software to automate plan review and permit review workflows.

Town-wide Recommendations with Direct Impact on PLUS

- Conduct a comprehensive space needs analysis.
- Implement a document management/records retention software system.

Implementation of many of these recommendations is already underway. For example, Town Administration and PLUS leadership have restructured and filled the Building Commissioner position. In addition, funding for the Senior Planner position has been identified. The Town has also entered into a professional services agreement with SHI International to assist with the implementation of the Town's EnerGov software system.

The Staffing Study recommended a Town-wide space analysis, which would be of benefit to PLUS. The Town is facing space constraints in several areas. The PLUS Department, specifically, is housed in a converted electric utility building that has not been developed to meet the Department's needs. The current space constraints impact customer service and staff productivity and will be an important factor to consider as the Town proceeds with a space needs analysis. The Study also recommended the implementation of a document retention/records management system for the organization. Many of the

processes in PLUS are entirely paper based. Currently, there is concern regarding the archiving of the Department's files and the condition in which the files are preserved.

In May 2018, the Town issued a competitive Request for Proposals (RFP) for a detailed operational and structural review of the PLUS Department. After reviewing proposals, the Town engaged The Novak Consulting Group in July 2018 to complete the study. The results of this examination are the focus of this report.

To accomplish this work, The Novak Consulting Group utilized a variety of methods to understand the operations of the Department. This included individual interviews with members of the Select Board, interviews with members of the Boards and Commissions that interact with PLUS, and 20 individual interviews and three focus group sessions with Town staff, both from within the PLUS Department and those who interact with PLUS. External stakeholders also participated in focus groups held to provide opportunities for additional feedback.

In addition to in-person interviews and focus groups, The Novak Consulting Group developed a survey to solicit input from PLUS stakeholders regarding their interactions with various disciplines throughout PLUS. The survey was sent directly to numerous stakeholders, promoted on the Town's website, and shared throughout the local development community. The survey had 62 responses. Results from the focus groups and survey are summarized in this report.

The Novak Consulting Group requested and received data and relevant information from the Department related to its structure, operations, practices, procedures, and workload. This information was analyzed to identify the Department's service demands and service standards and to determine opportunities for enhancing the efficiency and effectiveness of the Department.

About the PLUS Department

The PLUS Department was formed in 2012 to bring together most of the Town's land use related permitting and support functions. The Town consolidated all health, Historic District Commission (HDC), building, planning, zoning, Affordable Housing Trust, and real estate support functions into a single department, the PLUS Department. Subsequently, all health-related functions were moved into a separate department, and PLUS later expanded to include the Energy Coordinator and Housing Specialist positions. The MOA that created the PLUS Department designates that the PLUS Director is supervised by the Town Manager.

Before 2012, most of the departments operated independently of each other and were staffed by department directors who were direct reports of the Town Manager or individual Boards and Commissions (prior to 1996), with the Director of Planning reporting to the NPEDC. The NPEDC operates as Nantucket's Regional Planning Agency, one of 13 in Massachusetts, and is authorized by the State² to oversee local and regional planning functions, providing informal staff support to the Planning Board and generalized assistance to Town Administration on a wide variety of issues. The adoption of the Town Charter in 1996, and as amended in 2002, clarified and defined Town Administration departments to include the Zoning Board of Appeals, the HDC, and the Planning Board.

² Chapter 561 of the Acts of 1973 as amended.

In 2005, the Planning Board, Zoning Board of Appeals, and real estate/affordable housing functions merged into an informal Planning Office, overseen by the Director of Planning. Building, HDC, and Health became the Code Enforcement Department.

PLUS is organized into three primary units: the Land Use and Regulatory Division, the Safety and Code Compliance Division, and the Regional Focus Division. The structure of the Department is illustrated in the following organizational chart.

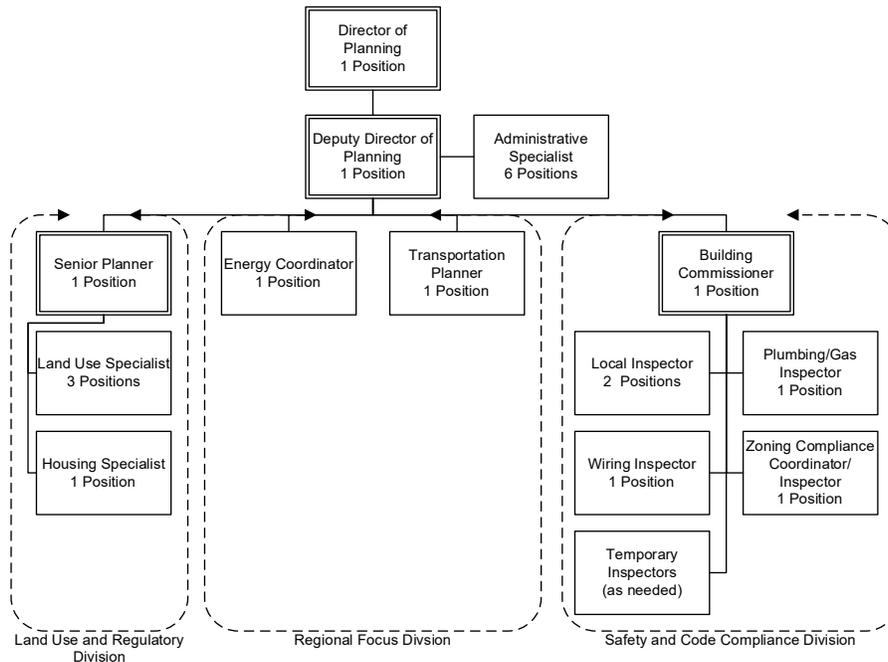


Figure 1: PLUS Organizational Structure, FY2018

The Land Use and Regulatory Division provides land use planning under the direction of the NPEDC and provides staff support to the Boards and Commissions that guide development on the Island. Staff conducts site plan reviews and offers professional recommendations for the Planning Board, HDC, Zoning Board of Appeals (ZBA), and other entities. Process maps illustrating the steps for HDC and Planning Board review and approval are included as Attachments A and B.

The Safety and Code Compliance Division is responsible for ensuring that development on the Island conforms with Town and State regulations. Staff reviews building permit applications and conducts Certificate of Occupancy inspections, ensuring that projects meet regulations and abide by the Town’s Zoning Code. Staff also conducts Certificate of Inspections annually for all restaurants, hotels, and other places of public assembly on the Island to ensure that they continue to meet local and state regulations. The process for obtaining a Certificate of Occupancy, including the required inspections and plan reviews, is illustrated in Attachment C.

The Regional Focus Division consists of the Energy Coordinator and the Transportation Planner. The Energy Coordinator is responsible for encouraging energy efficiency initiatives and programs on the Island. This position makes energy sustainability policy recommendations to the Select Board intended to help residents and businesses conserve energy. The Transportation Planner, funded through a state transportation grant, is responsible for developing and implementing plans for transportation improvements on the Island and works closely with the NPEDC.

PLUS staff also works closely with several Boards and Commissions including the NPEDC, Planning Board, ZBA, HDC, and the Affordable Housing Trust. These bodies are responsible for providing guidance to staff and the community regarding the Town's planning activities and have defined regulatory and advisory roles.

Nantucket Planning and Economic Development Commission

In 1955, Massachusetts became one of the first states in the nation to create legislation³ that paved the way for RPAs. Massachusetts RPAs are public organizations that serve the local governments and residents within their planning districts by addressing issues that cross city, town, county, and even state boundaries through planning, policymaking, communication coordination, advocacy, education, analysis, and technical assistance.⁴ Currently, there are 13 RPAs in the Commonwealth.

The NPEDC Website chronicles the creation of the NPEDC as follows: "The NPEDC was created by Warrant Article 5 of the January 25, 1973 special town meeting of the Town of Nantucket and by the Commonwealth of Massachusetts pursuant to Chapter 561 of the Acts of 1973, as amended by Warrant Article 117 of the 1980 annual town meeting and Chapter 98 of the Acts of 1981 and Warrant Article 57 of the Annual Town Meeting of 1991 and Chapter 458 of the Acts of 1991." The establishment of the NPEDC provides an organization with authority to oversee local and regional planning functions and provide informal staff support to the Planning Board and generalized assistance to Town Administration on a wide variety of issues. Since its creation, the NPEDC has been responsible for the Town/County's planning services. It is also responsible for the development and preparation of comprehensive plans for the Town/County and for recommending their implementation to the appropriate departments. Most recently, plans have included the Regional Transportation Plan, Hazard Mitigation Plan, and Open Space Plan, and the Commission has also provided input on the Town's Master Plan.

The NPEDC is the only RPA in the Commonwealth that serves a town, a county, an island, and a region. On average, the RPAs in Massachusetts represent 27 member communities. The largest is the Metropolitan Area Planning Council which includes 101 communities.

The NPEDC consists of 11 members including the five members of the Planning Board, a representative from the Nantucket Housing Authority, a representative of the County Commissioners of Nantucket County, a representative of the Conservation Commission, and three at-large members (with staggered terms). In addition, three staff members from PLUS serve as liaisons to the Commission including the Director of Planning, Deputy Director of Planning, and Transportation Planner.

Since its creation, the NPEDC has been responsible for the appointment and oversight of the Director of Planning through an employment agreement. However, the MOA specifies that "the Director of Planning will report to the Town Manager for the administration of PLUS." Although a mechanism for formalizing how and if the Town Manager will interact with the NPEDC regarding the Director's performance is not specified, beginning with the 2018 review year, the Town Manager has started to submit a performance evaluation of the Director to the NPEDC.

The regional planning association designation has allowed Nantucket to be eligible for several state and federal grants and programs. For example, the Town recently received a 3C Transportation Planning

³ Massachusetts General Laws Chapter 40B

⁴ <http://www.massmarpa.org/who-we-are>

Activities grant, valued at \$1,055,980⁵, for regional transportation planning activities that are required by the Federal Highway Administration (23 USC 13). In FY2019, the region received its allocation of \$50,000 in District Local Technical Assistance funds for various planning initiatives in Nantucket, including transportation and affordable housing projects.

In addition, Nantucket's Transportation Improvement Program, a five-year listing of Federal and State Highway and Transit projects, received funding in FY2018 for various transportation projects, including \$3.2 million for improvements along Milestone Road and \$1.7 million for annual public transportation capital and operating assistance.

Planning Board

In 1928, the Town adopted the General Laws of the Commonwealth of Massachusetts⁶ relating to Planning Boards. The Planning Board was established to protect the safety, convenience, and welfare of the residents of Nantucket by regulating the layout and construction of ways within subdivisions that have not become public ways and ensuring adequate sanitary conditions in subdivisions, and in some cases, parks and open spaces.

The Board consists of five members who are elected for five-year, rotating terms at the Annual Town Election. In addition, three associate members are appointed by the Select Board for alternating three-year terms and serve in the case of an absence. All five members of the Planning Board also sit on the NPEDC.

The Planning Board is responsible for the approval or denial of residential and commercial permit requests including subdivisions, lot divisions, multi-family developments, tertiary, and secondary dwelling requests. The Board also has the authority to approve or deny special permits for major commercial development, structures within the Moorlands Management District, various commercial uses, and waivers for driveway access regulations.

The Planning Board is responsible for recommending changes to the Town's zoning code and for completing a Master Plan of the Town that is intended to provide a basis for decision making regarding the long-term physical development of the municipality. At the Annual Town Meeting, the Planning Board submits a report with zoning map changes or zoning bylaw changes.

Zoning Board of Appeals

The ZBA was established to provide an appeal process for any aggrieved applicant due to an inability to obtain a permit or enforcement action or to request a variance or special permit from the zoning by-laws.

The ZBA consists of five members and three associate members serving staggered terms (five and three-year terms), each appointed by the Select Board. The ZBA is responsible for hearing and deciding the following cases:

- Special permits
- Special permits with minor site plan review
- Appeals from decisions of the Building Inspector

⁵ Term of grant is 10/01/17 to 9/30/21

⁶ Nantucket Town Code, MGL c. 41, §§ 81A, 1928

- Appeals from decisions of a Zoning Enforcement Officer
- Petitions for variances
- Comprehensive permits for 40Bs

Decisions of the ZBA can be appealed to the Nantucket Superior Court or Land Court.

Historic District Commission

In 1955, the HDC was created to promote the general welfare of the inhabitants of the Town of Nantucket through the preservation and protection of historic buildings, places, and districts of historic interest through the development of an appropriate setting for these buildings, places, and districts and through the benefits resulting to the economy of Nantucket in developing and maintaining its vacation-travel industry through the promotion of these historic associations.⁷

The HDC consists of five Commissioners who are officially elected for rotating three-year terms at the Annual Town Meeting. The HDC is responsible for issuing Certificates of Appropriateness or non-applicability for the following:

- New buildings/structures prior to a building permit being issued
- Building alterations that impact exterior architectural features of buildings
- Construction or display of an occupational or other sign exceeding two feet in length and six inches in width
- Construction or display of more than one sign, irrespective of size, on any lot, building or structure located within the Historic Nantucket District

Once construction is completed, the HDC is responsible for ensuring that the property is inspected to confirm compliance and provides a written certification before a Certificate of Occupancy permit can be issued by the Building Inspector. The HDC also issues all demolition permits. Appeals of HDC decisions are heard by the Select Board.

Affordable Housing Trust Fund

In 2009, the Town adopted Massachusetts General Laws Chapter 44, section 55C, which created the Town of Nantucket Affordable Housing Trust Fund. The purpose of the trust is to provide for the creation and preservation of affordable housing for the benefit of year-round low and moderate-income households who would otherwise have difficulty financially or in other ways and for the funding of community housing. The Board consists of seven members who are appointed by the Select Board for a term of two years.

⁷ Town of Nantucket Code - § A301-4 Historic District Commission

Stakeholder Input

Stakeholder input was sought through a variety of means as part of this assessment process to gather feedback on the Department's strengths and challenges. This process included interviews with Board and Commission members and external focus group sessions with development, business, and neighborhood stakeholders. Also, a confidential survey was distributed to members of the development community, neighborhood representatives, and other individuals who interact with PLUS. Stakeholder input from the interviews, focus groups, and survey is summarized below.

The Novak Consulting Group conducted interviews with members of the Boards and Commissions that interact with PLUS and held two focus group sessions with other interested PLUS stakeholders. Eleven individuals participated in focus groups, and 62 individuals responded to the online survey. These opportunities for input were advertised by the Town. While the survey was not intended to be statistically valid, opinions were expressed that represent various perspectives on the Island concerning PLUS. People who attended the focus group meetings included builders, developers, architects, attorneys, real estate agents, and residents. Common themes reflect ideas that were expressed by at least five of the eleven participants and included the following thoughts:

- **PLUS staff is professional and responsive.** Participants highlighted the staff's positive attitude and willingness to assist customers.
- **There is a need for better accountability within PLUS.** Some participants indicated that there was not a culture in the Department to reinforce accountability.
- **Zoning enforcement is complaint based.** Participants expressed a concern that zoning enforcement tends to be more reactive versus proactive, and they would like to see proactive enforcement of zoning permits.
- **Processes are overly complex and often delayed.** Participants expressed frustration with the time and steps involved in the development review process and noted that the absence of a single staff member can create a delay in the process.
 - It should be noted that while this concern was expressed by people who attended the focus groups, there have been significant improvements to cross-training and ensuring appropriate backup since the MOA was put in place in 2012.
- **There is a need for better communication between the Boards and Commissions as well as PLUS leadership.** Participants expressed a desire to better understand how the PLUS Boards and Commissions interact with each other and how their decisions interrelate.
- **PLUS should implement technology to streamline and improve processes.** Participants noted a desire for the Department to move from paper-based processes to electronic processes for business such as application submission and inspection scheduling.
 - It is important to point out that this is a shared priority of the PLUS Department and the Town and use of additional technology is underway as the Town implements a system known as EnerGov.

- **Improve communication between staff and applicants during the development review process.** Participants expressed a need for better communication between the Department and the applicant during the development review process. Currently, there is not a mechanism for applicants to know the status of their application in the review process, and the Department only schedules Coordinated Review Meetings for high profile projects.

During the session, participants were asked what PLUS does well. Responses included the following:

- Staff is generally friendly, responsible, and reasonable.
- The administrative staff is friendly when you walk into the building.
- The Director and Deputy Director are easy to work with, open to information, unbiased.
- Consolidating the Department and its files has been a positive change.
- Staff is willing to meet with applicants and provide advice.
- Department has made good hires.

Other input about challenges and opportunities for improvement is integrated into the Common Themes that have been shared.

The Novak Consulting Group also administered a survey, which was made available to the community via the Town's website. The link to the survey was also emailed to stakeholders, including those individuals who have interacted with the Department as customers (builders, developers, architects, etc.), and to PLUS Board and Commission members, and was available on the Town's website. The purpose of the survey was to assess perceptions and experiences with the Department.

The survey was administered using SurveyMonkey®, a web-based survey tool, and was available from October 30 – November 21, 2018. A total of 62 stakeholders participated.

The survey tool had 21 questions and was designed to gauge respondents' views on aspects of the Department including the development review and building inspections processes, as well as community outreach. The survey asked respondents to provide input on the Department's strengths, challenges, and opportunities for improvement. Questions were generally asked in two forms: ratings scale (strongly agree, agree, disagree, and strongly disagree) and open ended.

Respondents could opt out of sections or questions if they were not applicable and often could select more than one option, resulting in percentages of more than 100%. The numbers presented in the survey analysis are rounded to the nearest whole number and may not add to 100%.

In this analysis, the term "significant" is used to describe statements with which 77% or more of respondents expressed overall agreement and statements with which 52% or more of respondents expressed overall disagreement. These thresholds are based on the overall percentage of positive and negative responses. Significantly positive and significantly negative results are highlighted in the narrative and are bolded in each table.

Respondent Profile

Respondents were asked to specify how they interact with the PLUS Department. The majority (82%) identified themselves as Nantucket property owners. However, many property owners also indicated that they interact with the Department in other capacities.

A total of 15 respondents (24%) indicated that their only interaction with PLUS has been as a property owner. The table below provides a summary of the responses.

Table 2: Roles in which Respondents have Interacted with PLUS

Role	Number of Responses	Percent of Responses
Property owner	51	82%
Builder	22	35%
Real estate professional	12	19%
Architect	9	15%
Town or other agency employee	9	15%
Town Board or Commission member	7	11%
Developer	6	10%
Other	6	10%
Neighborhood representative	4	6%
Engineer	1	2%

Respondents were asked which PLUS functions they interacted with over the past year. More than three-quarters of respondents (83%) interacted with Building Inspections and Permitting, and more than two-thirds (67%) have had contact with Planning. The following table provides an overview of the respondents' interactions with PLUS functions.

Table 3: PLUS Functions with which Respondents have Interacted in the Past Year

Function	Number of Responses	Percent of Responses
Building Inspections and Permitting	50	83%
Planning	40	67%
Zoning	37	62%
Code Enforcement	29	48%
Housing	16	27%
Other	2	3%

Overall Survey Themes

Respondents provided input regarding their opinions on the Department, its processes, and opportunities for improvement. The following is an overview of the general themes of the survey.

- **Respondents recognize and appreciate the skills and knowledge of PLUS staff.** Survey respondents largely feel that PLUS Department staff is knowledgeable (84%) and professional (77%), and that information provided by the Department is accurate (77%).
- **Respondents see opportunities to improve the development review process.** A total of 70% of respondents believe that the process is difficult to understand, and 65% believe that the process compares unfavorably with that of other jurisdictions.

- **Respondents are largely positive about the inspections processes.** The majority of stakeholders responded positively to questions about the HDC, plumbing, wiring, and building inspection processes. Respondents' statements on plumbing, wiring, and HVAC inspections were especially positive; 91% of the respondents said they have a clear understanding of the inspections process, that scheduling an inspection was easy, and that inspectors are professional and fair.
- **Respondents would prefer to be kept informed about development on the Island via email.** Survey respondents indicated that they most commonly learn of development activity through word of mouth. A total of 42% typically learn via word of mouth compared to 24% who learn via newspaper and 26% via social media. When asked how they would prefer to learn about development activity, the most common response was that responders would prefer to learn via email.

Development Review Process

Respondents were asked to provide input regarding their experience with the Department's plan review process. A total of 12 respondents opted out of this section. Respondents were asked what types of projects they had submitted for development review within the past year. Responses are summarized below.

Table 4: Types of Projects Submitted for Development Review in the Past Year

Function	Number of Responses	Percent of Responses
Construction requiring a Building Permit	36	88%
Construction requiring a Certificate of Appropriateness	27	66%
Approval Required Subdivision	8	20%
Approval Not Required Subdivision	10	24%
Use requiring a Special Permit	13	32%
Variance	11	27%
Other/Unknown	5	12%

The most common response was construction requiring a building permit (88%), and nearly two-thirds of respondents (66%) had applied for a Certificate of Appropriateness within the past year.

Respondents were also asked to provide the average length of time it took for staff to complete their project review. Half of the respondents identified an average review time of more than six months, although another 32% identified an average review time of two months or less. Responses are summarized below.

Table 5: Average Length of Time for Project Review

Function	Number of Responses	Percent of Responses
More than six months	19	50%
One to two months	9	24%
Less than one month	3	8%
Two to three months	3	8%

Function	Number of Responses	Percent of Responses
Three to four months	2	5%
Five to six months	2	5%
Four to five months	0	0%
Total	38	100%

Respondents were also asked which Boards and Commissions they have interacted with as part of the development review process, including the HDC, Planning Board, and ZBA. Nearly all respondents (92%) have had interactions with the HDC, while approximately half of the respondents have had interactions with the Planning Board (51%) and the ZBA (49%). Responses are summarized below.

Table 6: Boards and Commissions Interacted with During Review Process

Function	Number of Responses	Percent of Responses
HDC	36	92%
Planning Board	20	51%
ZBA	19	49%
Other	3	8%

Respondents were asked if these entities meet their expectations, and if not, what could be done differently. The most common response was that the processes should be simplified. Many responses mentioned frustration with the amount of paperwork, regulations, and the steps involved with the approval process.

Respondents were asked if the length of the PLUS development review process met their expectations. More than half of the respondents said no (66%), while 34% said yes. Those who answered no were asked what could have been done differently to meet their expectations. Common responses included such things as implementing an e-permitting/electronic application process, streamlining the process, implementing express permitting, and improving communication with staff and the applicant throughout the development review process.

Respondents were asked to rate the level of agreement with statements regarding the Town’s development review process. The majority of applicants (92%) agreed that the Town requires fully completed applications to be submitted.

Table 7: Summary of Responses to Statements Regarding the Development Review Process

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree
Engaging in the Town’s development review process resulted in a higher quality project.	15%	26%	50%	9%
The Town’s process for development review compares favorably with other jurisdictions.	4%	31%	31%	35%
Current development regulations facilitate development in the Town.	6%	43%	43%	9%

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree
The fees charged by the Town are reasonable.	5%	70%	24%	0%
The application submittal process worked well.	3%	33%	50%	14%
The Town requires fully completed applications to be submitted.	27%	65%	8%	0%
The review process is easy to understand.	0%	30%	49%	22%
Review comments were received in a timely manner from staff.	0%	44%	38%	18%
Staff reviews are thorough.	6%	57%	23%	14%

Inspection Processes

Respondents were asked questions about the inspection process in general. A total of 13 out of 62 respondents opted out of the section. When asked if the inspection process met their expectations, 46% of the respondents said yes, and 54% said no. Those who answered no were asked what could have been done differently to meet their expectations. The most common response was that inspectors could have had a higher level of professionalism. Several respondents also mentioned that there could be more consistency in inspectors' findings.

Respondents were also asked if they had received timely feedback on their permit applications: 38% said yes, and 62% said no. Those who answered no were asked what could have been done differently to meet their expectations. The most common responses were that the overall processes could be more efficient and that communication with applicants could be more frequent and consistent.

HDC Inspections

Respondents were asked to rate their level of agreement with statements regarding the HDC inspection process. While the majority of responses were positive, 55% of respondents do not believe that information about HDC inspections is readily accessible. The following table is a summary of the responses regarding the HDC inspection process.

Table 8: Summary of Responses to Statements Regarding the HDC Inspection Process

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree
Information about PLUS inspections is readily accessible.	7%	38%	48%	7%
I have a clear understanding of the inspections process.	17%	52%	24%	7%
Scheduling my inspection was easy.	10%	66%	21%	3%
Inspections occur on time.	7%	50%	39%	4%
PLUS inspectors are professional.	10%	66%	17%	7%
PLUS inspectors are fair.	10%	66%	24%	0%

Wiring, Plumbing, HVAC Inspections

Respondents were asked to rate the level of agreement with statements regarding the wiring, plumbing, and heating, ventilation, and air conditioning (HVAC) inspection processes. Every statement in this category had a significantly high percentage of positive responses. More than 90% of respondents stated that they

have a clear understanding of the inspections process (91%), that scheduling an inspection was easy (91%), that inspectors are professional (91%) and that inspectors are fair (91%). Responses are summarized in the following table.

Table 9: Summary of Responses to Statements Regarding the Wiring, Plumbing, and HVAC Inspection Processes

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree
Information about PLUS inspections is readily accessible.	4%	79%	17%	0%
I have a clear understanding of the inspections process.	0%	91%	9%	0%
Scheduling my inspection was easy.	4%	87%	9%	0%
Inspections occur on time.	9%	78%	13%	0%
PLUS inspectors are professional.	4%	87%	9%	0%
PLUS inspectors are fair.	5%	86%	9%	0%

Building Inspections

Respondents were asked to rate the level of agreement with statements regarding the building inspection process. While the majority of responses were positive, 61% of respondents do not believe that information about inspections is readily accessible. The following table is a summary of responses.

Table 10: Summary of Responses to Statements Regarding the Building Inspection Process

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree
Information about PLUS inspections is readily accessible.	0%	41%	56%	4%
I have a clear understanding of the inspections process.	4%	59%	30%	7%
Scheduling my inspection was easy.	0%	74%	26%	0%
Inspections occur on time.	4%	63%	30%	4%
PLUS inspectors are professional.	4%	52%	26%	19%
PLUS inspectors are fair.	4%	54%	23%	19%

Community and Neighborhood Outreach

Respondents were asked to discuss their interactions with the Department’s community outreach efforts, a total of eight out of 62 respondents opted out of this section. Respondents are engaged with development on the Island. More than two-thirds of respondents have attended a public meeting in their own neighborhood (68%) and elsewhere on the Island (69%) within the last six months. Responses are summarized in the following tables.

Table 11: Attendance at Development Public Meetings or Hearings in Respondents' Neighborhood

Most Recent Attendance	Number of Responses	Percent of Responses
Within the last six months	21	68%
Within the last 12 months	6	19%
Yes, not within the last year	2	6%
Never	2	6%
Total	31	100%

Table 12: Attendance at Other Development Public Meetings or Hearings on the Island

Most Recent Attendance	Number of Responses	Percent of Responses
Within the last six months	22	69%
Within the last 12 months	5	16%
Yes, not within the last year	4	13%
Never	1	3%
Total	32	100%

Respondents were asked how they typically learn about development activity in their neighborhood. The most common response was word of mouth, with 42% identifying it as one way they typically hear of development activity. Responses are summarized in the following table.

Table 13: Typical Methods of Learning about Development Activity

Method	Number of Responses	Percent of Responses
Newspaper	15	24%
Social Media	16	26%
Town website	11	18%
Word of mouth	26	42%
Other	6	10%

Respondents were asked how they would prefer to be notified of development activity in their neighborhood. The most common response was that respondents would prefer to be notified via email. Responses are summarized in the following table.

Table 14: Preferred Communication Methods

Method	Number of Responses
Email	10
Newspaper	3
Social Media	3
Abutter's Notice	2

Method	Number of Responses
Text	2
Mail	1
Website	1

PLUS Overall

Respondents were also asked to provide input on the PLUS Department as a whole and asked to rate their level of agreement with statements regarding customer service. The majority of responses were positive: 84% of respondents believe that staff is knowledgeable, and 77% believe that staff provides accurate information and is professional.

Table 15: Summary of Responses to Statements Regarding the Department’s Customer Service

Statement	Strongly Agree	Agree	Disagree	Strongly Disagree
Information provided by staff is accurate.	16%	61%	19%	3%
Staff are responsive to questions and comments.	25%	47%	22%	6%
Staff are accessible.	25%	44%	25%	6%
Staff are knowledgeable.	25%	59%	13%	3%
Staff are professional.	29%	48%	16%	6%
Applications, checklists, and other related materials are clear.	10%	39%	45%	6%
Public information is easily accessible (maps, applications, agendas, etc.).	19%	50%	22%	9%
Notifications about upcoming issues or applications are provided in a timely manner.	17%	47%	23%	13%

Property Owners and Customers

As a component of the survey analysis, The Novak Consulting Group provided a comparison between those respondents who interacted with the PLUS Department as a customer (“Customers”) and those whose only interaction with PLUS has been as a property owner (“Property Owners”), recognizing that these two groups may differ in the type of projects and in their frequency of interactions with PLUS.

For this analysis, Customers are identified as builders, real estate professionals, architects, developers, or engineers. It should be noted that many Customers may also own property on the Island but often interact with PLUS in a specialized or customer capacity. Property Owners are identified as those respondents whose only interaction has been with the Department as a Property Owner.

The following themes emerged when comparing these two specific data groups:

- **Customers and Property Owners experience PLUS differently.** More than half of those identifying as Customers (68%) view PLUS favorably compared to 60% of Property Owners. The largest differences in how Customers and Property Owners experience PLUS relate to access to information and scheduling inspections.

- **Property Owners believe that PLUS information is accessible and clear.** The majority of Property Owners (91%) agreed that information was easily accessible compared to 57% of Customers. In comparison, 73% of Property Owners felt that applications, checklists, and other related materials were clear, while only 35% of Customers did.
- **Customers view the inspection process much more favorably than Property Owners.** The majority of Customers (86%) found scheduling inspections easy compared to 22% of Property Owners. While 76% of Customers agreed that inspections occur on time, only 33% of Property Owners agreed.

Analysis and Recommendations

This report identifies opportunities to improve the efficiency and effectiveness of programs, processes, and procedures in the PLUS Department. It includes recommendations specific to the Department's management structure and development review process and encourages staff to capitalize on technology to assist the Department in becoming more efficient and effective. Ensuring processes are clearly defined and articulated to applicants, Boards, and Commissions, as well as staff will help improve performance within the Department.

Management

Recommendation 1: Continue to strengthen the relationship between the Town Manager and the Director of Planning as the Town lives into the 2012 Memorandum of Agreement between the Town and NPEDC.

In August 2012, the Town and NPEDC entered into a formal MOA which indicated that the Director of Planning would be responsible for the administration of the PLUS Department including all planning and building functions. Section 1 of the MOA states that "The administration of PLUS will be handled by the Director of Planning and the Director of Planning will report to the Town Manager for the administration of PLUS." As a component of the MOA, the Director of Planning also has an employment agreement with the NPEDC and the Town.

The MOA outlines that the Director is a member of the Town Manager's Cabinet, an administrative advisory group that assists Town leadership in the achievement of Select Board and Town goals, budget development, Town meetings, and administrative policy issues.⁸ The MOA also states that a list of deliverables will be developed by the Director and Town Manager and that the Director and Town Manager will meet regularly to review progress toward the achievement and completion of the deliverables. This is typical of a manager and director relationship – attending required meetings, developing goals, and holding staff members accountable for meeting those goals. The Town Manager and the Director of Planning meet monthly. However, the Town Manager has not consistently been asked to participate in conversations regarding the performance of or establishing salary, etc. for the Director of Planning and Deputy Director who have employment agreements with the NPEDC. In 2019, the Town Manager was invited to provide input into the Director of Planning's performance evaluation and has committed to doing so.

Dispersed accountability can be challenging, and currently, appointment, reappointment, and termination are all at the discretion of the NPEDC, not the Town Manager. So, while the MOA states the Director of Planning reports to the Town, separating accountability can weaken the ability of the Town Manager to hold staff accountable for their work. It should be noted that while the NPEDC establishes the Director's compensation, the majority of the funding (90%) comes from the Town's General Fund budget. The Town Manager should be an active participant in conversations with NPEDC about budget implications and available resources when compensation is discussed.

The consolidation of the Town's planning and building functions has had many positive benefits. It is important that the NPEDC, Town, and Director of Planning continue to have procedures in place that align with the MOA and establish a clear reporting structure and open communication among all parties to ensure full implementation of the MOA.

⁸ Town of Nantucket and NPEDC MOA, 2012

Recommendation 2: Continue to consolidate the Town's environmental and sustainability functions.

As part of the Town's 2018 Strategic Planning Framework, the Select Board adopted Environmental Leadership as one of its key areas of focus. The aspirational statement the Board developed to support Environmental Leadership is, *"Nantucket residents and visitors share responsibility for the long-term sustainability of our beautiful Island. We recognize our stewardship of the land, air, and water and work to ensure our community is resilient and self-sufficient. Other communities look to Nantucket to learn how to care for the natural environment."*⁹

As the Town implements its goal of becoming a leader in environmental stewardship, the Town should explore consolidating the organization's environmental and sustainability functions. This move would provide an opportunity to align like programs, services, and activities responsible for developing and implementing policy initiatives that promote a comprehensive definition of Sustainability, sometimes referred to the Triple Bottom Line of People, Planet, and Prosperity. In Nantucket, environmental, economic, and social sustainability are important elements of this more comprehensive definition of Sustainability.

Over the last decade, more municipalities have begun developing departments or offices that focus on preserving the environment and the implementation of sustainability practices. Common sustainability initiatives aligned in the same service area include the following:

- Water Conservation
- Air and Natural Resources
- Energy Efficiency
- Trash, Recycling, and Waste Reduction
- Green Building
- Sustainable Transportation
- Climate Action
- Carbon Neutrality
- Greener Government

The Town has been pursuing grant funding for the creation of a Sustainability Office that is focused on environmental sustainability, recognizing that the organization has several programs and areas that focus on environmental sustainability and stewardship. However, each is operating independently throughout the organization. Aligning these similar programs and functions within one department will promote collaboration, resource management, and conservation practices and provide the Town with the flexibility to expand and grow the organization's sustainability initiatives.

In 2011, the Town established the Energy Office to provide guidance and assistance for Island-wide energy projects. The Energy Office is responsible for developing municipal and community-wide energy policies, practices, and projects that deliver significant taxpayer savings through reduced energy costs while contributing to overall community sustainability and economic development. The Office is tasked with implementing energy efficiency, conservation, and renewable energy programs. Currently, the Energy Office is located in PLUS but aligning the functions with other similar activities within the organization would encourage enhanced collaboration and cohesiveness with areas of the organization that share a common mission.

⁹ Nantucket Strategic Planning Framework, 2018

The Town's Natural Resources Department is responsible for conservation efforts including surface water quality testing in the Town's ponds and harbor, shellfish propagation and enforcement of shellfish regulations, dune management and erosion control, and wetlands protection. Staff is responsible for researching climatic impacts on water quality, conducts educational outreach to the public regarding fertilizer use, and assists with enforcing the Town's shellfish regulations. One of the goals leadership plans to complete by December 2020 is to finalize an Island-wide, long-term water quality management plan that addresses ponds, harbors, stormwater, and wastewater with specific ways and methods to measure improvement. There may be an opportunity to consolidate those activities and programs within Natural Resources that focus on sustainability and environmental stewardship with other similar Town-wide programs.

Continuing to consolidate environmental and sustainability functions maximizes resources and assists Town leadership in realizing their goals. Cross-functional work groups like those working on the implementation of the Select Board's Strategic Plan further support this concept and provide an opportunity for conversation across different parts of the organization that are focused on Sustainability. Further consolidation in the future may provide the existing sustainability functions greater visibility within the organization and the community. The Town may also become more competitive when applying for grants that focus on environmental initiatives.

Development Review

Recommendation 3: Establish a Development Review Team to be chaired by an Assistant Town Manager.

As is common with many regulatory processes, the Town's development review process is complex and involves multiple staff throughout the organization. Several core processes, including HDC, Planning Board, and Building Review approvals, were mapped as part of this assessment. (See Attachments A, B, and C.) As the maps illustrate, applicants typically begin the development review process with the HDC, then move on to approval by the Planning Board or Conservation Commission, and finally, submit their application materials for Building Review in order to receive a building permit when necessary.

When an application is submitted for approval by the HDC, applicants start with the HDC Land Use Specialist who reviews the application for completeness. The Land Use Specialist interacts with the applicant to request changes or additional information as needed. PLUS administrative staff and the HDC Land Use Specialist prepare the HDC agenda and, at the meeting, the HDC is responsible for reviewing the application and issuing a Certificate of Appropriateness. The HDC may also issue conditional approval if additional changes are requested. Once the HDC has approved the application, the applicant receives their Certificate of Appropriateness from the PLUS Office.

Depending on the type of project, the development review process may be complete after the HDC approval process or continue, if necessary. For example, at this point, an applicant changing the paint color or replacing windows in their home would have received the necessary approvals to complete their project. However, an applicant wanting to make major renovations to their property or build a new structure would need to acquire additional approvals in the review process.

The next phase in the process for those projects requiring a public hearing (Special Permits or Approval Required Subdivisions) is to seek approval by the Planning Board. To initiate this process, the applicant is required to provide two (2) copies of the application to the Town Clerk for stamping. The Town Clerk stamps both applications then keeps a copy and gives the other to the applicant. In addition, an abutters list is required for all public hearing applications, which applicants receive from the Town Assessor's Office. The applicant is then required to submit that "Town Clerk Stamped copy" to PLUS as part of their completed

package. Once PLUS receives the application, it is assigned a planning board number, and the Planning Land Use Specialist reviews the application and may seek input from outside staff (engineer, DPW, etc.). After reviewing the application, the Planning Land Use Specialist will notify the applicant if changes or additional information are needed, and an updated application and plans may be submitted.

Approvals Not Required (ANR) applications do not require a public hearing. However, applicants are still required to provide two (2) copies of the application to the Town Clerk for stamping. The Town Clerk stamps both applications then keeps a copy and gives the other to the applicant. The applicant submits the "Town Clerk Stamped copy" to PLUS as part of their completed package. Once PLUS receives the application, it is also assigned a planning board number. While the ANR Subdivision Plans are not public hearings, state law requires that the applications are stamped by the Town Clerk's office before submitting to PLUS.

Once PLUS has reviewed the complete application, the Planning Land Use Specialist drafts a staff report and the legal ad and sends notification letters to the appropriate property abutters. PLUS staff prepares and distributes the Planning Board agenda. At the meeting, the Planning Board either approves or denies the land use application and issues the appropriate permit. If the application is approved, the Planning Board members sign the decision, and PLUS administrative staff file the approved permit with the Town Clerk. The applicant then receives the permit from the Town Clerk, and the applicant can now apply for a building permit.

The final phase in the development review process is applying for a building permit, which is outlined in Attachment C. This requires the applicant to submit a building application along with all required materials and submittals. It should be noted that before a building application is considered complete, all appropriate approvals must be received. Many of these approvals and permits are in addition to the HDC and Planning Board review, such as the following:

- Conservation Commission approval
- Septic Permit approval from Health and Human Services
- Water Well Completion Report from Health and Human Services
- Sewer Entry Permit from the Sewer Department
- Driveway Access approval from the Public Works Department
- Fire inspection from the Fire Department

Once all the approvals and permits are acquired, the applicant submits the building application to the Safety and Code Compliance Division for review. First, the Zoning Compliance Coordinator reviews for zoning compliance then passes the application to the Building Inspector for review. The Building Inspector may request additional information or ask that the applicant make changes to their drawings/plans. However, once the Building Inspector deems the application final, it can be approved for a building permit. The applicant can then receive the building permit and construction can begin.

As the process maps illustrate, the development review process can be extensive, and the necessary approvals vary based on project type. In addition, the applicant may be required to make changes to the application throughout each phase of the process. A high level of responsibility and understanding is also expected of the applicant. While many of the people who work with PLUS are frequent users of the process (consultants, attorneys, engineers, etc.), for those unfamiliar with the process, learning how to navigate the Town's development review process may be daunting. The applicant is responsible for resubmitting a

new application to start each phase of the process (HDC, Planning Board, Building Review) and is assigned a new staff contact during each phase.

Based on interviews with staff and stakeholders, those who are responsible for the oversight of the various development review phases (HDC, Planning Board, Building Review) do not communicate regularly with one another as a group regarding their comments or concerns. According to the stakeholder survey and focus group interviews, the applicant may be asked to make changes throughout the process that conflict with direction received from other staff members.

Recognizing that some projects are more complex, PLUS holds coordinated review meetings for large scale projects that require a Planning Board special permit or subdivision approval. This is a best practice. Usually, one of the Land Use Specialists, with input from the Director of Planning or Deputy Planning Director, schedules and chairs the meeting. Coordinated review meetings are held on a project-by-project basis and are scheduled with the applicant, their team, and staff members. Typically, representatives from the Public Works, Fire, Police, Sewer, Water, and PLUS (Building, Planning, Zoning) as well as Town Administration are invited to the meetings. When applicable, representatives from the Natural Resources Department, Airport, and private utility companies may be invited.

The Coordinated Review process is not used consistently and, unfortunately, staff from the various disciplines outside of PLUS (Public Works, Fire, Police, Sewer, and Water) do not always attend. This lack of communication between disciplines can cause issues for staff, resulting in delays for applicants. Currently, other than the project-by-project coordinated review meetings, there is not a consistent mechanism for discussing and resolving interdisciplinary issues, such as infrastructure concerns relating to sewer, water, roadways, and traffic, throughout the organization.

Many of the respondents in the Stakeholder Survey noted that the current review process is confusing; 70% of survey respondents felt the development review process is difficult to understand, and 59% said that they do not believe that the current development review process results in a better product. It can be difficult to understand the steps in the process and what documentation is required in their specific circumstances. This not only makes the process more difficult and time-consuming for applicants, but it can add to the staff's work by increasing the time they spend answering questions and correcting mistakes.

In the current process, plan review is conducted by each discipline separately. Reviewers look at specific features of a project related to their discipline and provide feedback to the applicant related to those issues. The applicant receives feedback during each phase of the process, sometimes by multiple reviewers, rather than receiving comprehensive comments about their project and application all at once. Providing comprehensive feedback improves process efficiency and creates a table for staff members to resolve conflicting comments with one another before communicating with applicants.

The EnerGov permitting system that PLUS is actively working to implement as part of a Town-wide effort will improve coordination among disciplines. It will allow electronic routing of the application to all relevant parties and will serve to aggregate comments made by plan reviewers. Establishing an interdepartmental Development Review Team to ensure the completeness and comprehensiveness of its review process will further improve the process.

A Development Review Team provides a space for its members to discuss appropriate interpretations of Town codes, comprehensively review applications, plan for any significant upcoming projects, and collaboratively discuss and resolve issues. A Development Review Team will help ensure clarity and

consistency in how applications are processed and will provide applicants with comprehensive feedback on their applications, rather than the current system. This will help process applications in a more timely and efficient manner, improve the customer experience, and ensure the final development complies with all applicable Town codes and ordinances.

The Development Review Team should include a cross-section of the Town's key staff members who work on development projects, such as representatives from Health and Human Services, the Fire Department, the Sewer Department, and the Public Works Department. Meetings should be scheduled regularly to discuss current and upcoming projects. Benefits of utilizing a Development Review Team for applicants and staff include a coordinated review resulting in comments from all applicable reviewing departments, problem resolution, coordinated inspections, and better staff assistance.

The Team should decide whether to invite applicants to Development Review Team meetings. In many instances, it can be helpful to have the applicant present to answer questions and collaboratively problem-solve. Having an applicant present at the meeting also helps ensure that they understand the Team's feedback. However, in some cases, the Team may wish to have preliminary discussions on an issue before they discuss it with an applicant. One potential option is to have staff discussion take place at the beginning of the meeting and invite applicants to a later portion of the meeting. Recognizing the Town's unique location, there may be times applicants are unable to attend in person but using video-conferencing technology can mitigate this potential problem.

Typically, Development Review meetings are held at the beginning of the development process, and applicants have the opportunity to present (if attending), or staff can review a preliminary/conceptual development plan or detailed development plan with supporting documentation. Holding the meeting early in the process allows the applicant time to address issues before plans are finalized. Also, the applicant can be provided with a staff contact to work with throughout the entire process and have a clear understanding of which types of approvals and permits will be required for the project and the steps involved.

The creation of a Development Review Team will improve communication among disciplines, provide a comprehensive review of projects, resolve issues of conflict among disciplines, and ensure deadlines are met. If there are conflicting internal staff comments between disciplines, it is important that the Town help facilitate those conversations versus asking the applicant to serve as the mediator or resolve the issue. Additionally, applicants will have direct contact with staff members and leave the meeting knowing exactly what approvals are required.

To facilitate improved communication between disciplines and with applicants, it is important for the Town to designate an empowered Chair for this development review team. This person needs to be in a position of authority to provide clear and consistent direction to all development review staff, regardless of department. This position should also be the face of the process to the development community. Because this role will require significant institutional authority, it is recommended that ownership of the development review process be assigned to an Assistant Town Manager. The goal of having an Assistant Town Manager chair the Development Review Team is to hold staff accountable throughout the organization for attending the meetings and to create a deeper connection between PLUS and Town Administration.

To facilitate this relationship, the Assistant Town Manager, Director of PLUS, and Deputy Director should establish regular monthly communication meetings to keep each other informed of upcoming projects and

to determine which projects should be brought forward to the Development Review Team. The Assistant Town Manager should also offer advice and insights regarding projects, staff activities, and the development review process where appropriate.

Recommendation 4: Provide guidance to the Boards and Commissions in an effort to clarify the development process.

As mentioned in the previous recommendation, applicants are responsible for facilitating their application through the development review process. PLUS does not have a standardized order in which applicants must receive approvals or indicate where applicants should begin the development review process. While having some flexibility on where to go first, some guidance about starting with HDC, the Conservation Commission, or the Zoning Board of Appeals, etc. would provide useful to applicants, especially to those who are not frequent users of the process. While staff typically encourage applicants to start with the HDC, there is nothing formalized to indicate that this is the correct starting point. Also, the applicant may know that several approvals and permits are required from outside PLUS but may lack clarity on when they should seek these approvals.

There may be times applicants choose to submit applications simultaneously to review bodies or seek approval from the ZBA before going before the HDC or Planning Board. There is no policy guidance that indicates that this cannot take place. However, because this is uncommon, the Boards and Commissions may be unsure how to process these types of requests. In some cases, Boards and Commissions may require applicants to seek approval from another Board before hearing an item, even when it is not required.

When a Board chooses to not act on an item and requires it to be heard by another planning body, it results in the applicant losing time. For example, if an applicant was seeking a variance for a structure on their property and approached the ZBA to see if the variance would be granted, the ZBA may choose not to hear the item and refer the applicant to the HDC or Planning Board for approval first. This may require the applicant to work with an architect and develop formal drawings or plans which can be costly, especially if the variance was not something the ZBA would support.

PLUS staff should provide guidance and/or recommendations to its Boards and Commissions and, ultimately, applicants, to bring clarity to the development review process for applicants, Boards, and staff. PLUS leadership and its Boards and Commissions should work together to develop a clear path for applications, understanding that exceptions may occur.

To communicate the process with applicants, staff should develop informational materials that outline the development review process. The following recommendation includes more details on enhancing the availability of information to applicants, but, generally, PLUS materials should include staff contacts (names, phone numbers, emails), an overview of each phase in the process, and preferred order. This information could be shared with applicants during the Development Review Team meeting.

Technology

The Town has purchased the EnerGov e-permitting system to implement a fully-digital permitting process – something PLUS customers are eagerly awaiting. Implementation is necessarily a long process. Workflows and processes must be created for the system, and staff will require significant training to be able to work with EnerGov effectively. The Town plans to implement the system in two phases: Phase One will be the implementation in the Health and Human Services and PLUS Departments, and Phase Two is the development of a customer service portal.

The Select Board approved a professional services agreement in the amount of \$90,846 with SHI International to assist with the onsite implementation of EnerGov. SHI will partner with the Tyler Technologies EnerGov development team to develop the workflows for development review and permitting processes. The benefit of working with a contractor is that they are responsible for developing an implementation plan and leading the process to document workflows for the system. The contractor will work directly with PLUS and HHS staff who will assist in the process.

It will be critical that PLUS continue to dedicate staff time, resources, and attention to the implementation of EnerGov. PLUS leadership has stated that EnerGov is a priority, and they must relay its importance to staff. Recognizing that some of PLUS's processes and applications may be adapted as a result of the EnerGov implementation, staff should begin to plan for how information about processes and applications are provided and shared with applicants.

Recommendation 5: Enhance the availability of development process information for applicants.

The current practice in PLUS is to encourage applicants to call or visit the PLUS Office to receive information about the Department's application processes. PLUS's website includes limited information regarding the application or submittal process. Most application forms are unavailable online, which requires applicants to visit the PLUS office to receive a copy of the application and review requirements with staff. As the Town implements EnerGov, many of these issues will be addressed.

The Department should be commended for the high level of customer service it provides. Walking an applicant through the process in person may be appropriate in some cases. Providing additional guidance and process clarity on the PLUS Website could increase user satisfaction and understanding of the process.

While the PLUS website does provide a checklist of the materials that need to be submitted with an HDC application, it lists several items as "required where applicable" without explaining the applicable circumstances, and many of the items requested are highly technical in nature. For example, one potential requirement for submission is *"Door and Window Schedule: Must include window type (true divided, simulated divided), number of lights, dimensions, materials, manufacturers type name and type number."* Such a description can seem daunting to an applicant unfamiliar with the process.

As PLUS begins implementing EnerGov and its electronic submittal and review process, staff should also enhance the availability of information to applicants. As mentioned in the previous recommendation, to bring clarity and provide guidance to applicants regarding the development review process, the process, steps involved, required approvals, and staff contacts should be clearly articulated to applicants.

The Department should develop informative materials to assist applicants through the development review process, such as brochures or checklists that outline and explain the development review process, flow charts, and step-by-step instructions, as well as Frequently Asked Questions (FAQs) about the different processes. In addition, the Department should ensure that applications and forms are available online. Having information easily accessible will bring clarity and transparency to PLUS processes and will increase staff capacity by reducing the time spent explaining the processes to applicants who either call or come into the office. Samples of development review brochures are included in Attachment D.

While it will take time to develop these materials and ensure applications and instructions are available online, this investment will save significant staff time by making the process clearer to applicants. Also, the information provided to applicants will be current, user-friendly, and consistent.

Process Improvements

Recommendation 6: Clarify the application intake, application review, and inspection scheduling processes.

Currently, there are many different avenues through which applicants submit applications and schedule inspections. Some applications, such as those for electrical and plumbing permits, are available online, while others must be picked up from the PLUS offices in person. In some cases, such as for Planning and HDC inspections, the applicant requests an inspection by manually entering their inspection details into a log book at the PLUS office. The log book is then reviewed by the appropriate Land Use Specialist, and assignments are made. To schedule building inspections, the applicant calls or visits the office, and the administrative staff schedules the inspection in Outlook with the appropriate inspector.

Having so many different ways to submit applications and schedule inspections can create a perception that PLUS's processes are overly complex and may result in confusion for the applicant. It is understandable that the Department had so many different internal processes, recognizing that many of these functions had previously operated independently. Now that the Department is consolidated, there is an opportunity to align and clarify these processes.

The implementation of an EnerGov customer service portal in Phase Two of the implementation process will improve the efficiency and standardization of Department processes by creating workflows and automatically informing the applicant of status changes throughout the process. The Department should supplement these improvements by developing standardized processes for accepting applications and scheduling inspections throughout the Department.

Once new processes are in place, development administrative staff should be trained on the application intake and inspection scheduling processes. These processes should be documented as Department procedures and become a standard element of training new staff members. The processes should also be built into the workflows of EnerGov. The application intake processes should include standards on the following:

- What to review on an incoming application/review for completeness
- How quickly an application should be reviewed by administrative staff once submitted
- The process for notifying an applicant of any missing or incomplete information
- The process for receiving additional information from an applicant

A standardized process for application review will also be helpful. After the administrative staff has completed the intake process and routed an application for staff review, it could go to a Land Use Specialist or to Building staff, depending on the submittal and type of application. Again, these processes should be incorporated into the workflows of EnerGov. The application review process should include standards on the following:

- The process for notifying the applicant of any changes or additional requirements
- The process for accepting additional materials from an applicant
- Circumstances under which outside entities should review the application
- Procedures for routing applications to outside entities and timeliness expectations for their review
- The process for routing the approved application back to the applicant

The Department should also standardize its inspection scheduling process. Applicants should have the ability to request appointments online through the EnerGov customer service portal, but the Department should also develop formal procedures for the following:

- Reviewing and prioritizing requests for inspections
- Information that should be required when requesting inspections
- Information that inspectors should be required to provide after completing inspections
- Aggregating notes from different inspectors for a specific project or property

Standardizing these processes will make them more transparent and improve customer service. It will also ensure that all information on an application is collected and stored in one place, making it easier for staff to research background on the application or property. It will also ensure that the utility of EnerGov and the customer service portal are maximized by making the application submission and review processes as clear and straightforward as possible.

Recommendation 7: Develop an administrative approval process for routine HDC requests.

Nantucket is a federally-designated National Historic Landmark, and, as such, all development on the Island is closely regulated to ensure that it maintains its historic character. Exterior changes to any property must first be approved by the HDC to ensure that they meet historic district standards. Typically, the HDC is the first step for all applicants in the development review process, and as the process map in Attachment A indicates, the HDC approval process involves several steps.

Applicants submit an HDC permit application with PLUS, which is reviewed by the HDC Land Use Specialist. The Land Use Specialist determines if the application is complete, if additional information is necessary, and if the application can be approved administratively or requires formal HDC approval. Once ready to be heard, the item is scheduled, the staff report is generated for the Commission, and the meeting is held. At the meeting, the HDC determines if a Certificate of Appropriateness or non-applicability should be issued. The typical time frame from application submittal to the HDC is about four weeks but can vary if changes are necessary to the application.

Over the last three years,¹⁰ the HDC has reviewed an average of 72 items per meeting. Of these items, an average of 24 are on the consent agenda and are generally approved without discussion, leaving an average of 48 items to be discussed per meeting. Meetings are scheduled every Tuesday evening,¹¹ with Thursday afternoons held for any overflow items. Although Thursdays are intended for overflow and are not part of the regular meeting schedule, they are often a weekly or almost-weekly occurrence. The number and frequency of overflow meetings have been decreasing as illustrated in the following chart, but the HDC still has an average of two Thursday meetings per month.

¹⁰ September 2015 through October 2018

¹¹ With some exceptions for holidays and other conflicts

Table 16: HDC Meeting Data, FY2016-FY2018

HDC	FY2016	FY2017	FY2018	Percent Change FY2016 to FY2018
Total Meetings	62	66	64	3%
Total Overflow Meetings	31	25	23	-26%
Average Meetings per Month	5.2	5.5	5.3	3%
Average Overflow Meetings per Month	2.6	2.1	1.9	-27%
Total Consent Items	1,037	1,060	1,048	1%
Total Discussion Items	1,823	2,149	1,854	2%

The fact that the number of overflow meetings is decreasing, even though the number of meetings and number of items is going up, suggests that meeting time management may be improving. However, HDC members are still expected to participate in more than five meetings per month on average. These meetings can also be several hours long. For example, the six meetings in September 2018 lasted between 1.5 and 4.5 hours each, with an average length of 3.5 hours per meeting. This is a significant time commitment and is likely prohibitive for many Nantucket residents who would otherwise be willing and able to serve on the HDC.

In addition to the time commitment for the Commission members, the HDC Land Use Specialist spends a large amount of time reviewing applications, preparing agendas, and attending the HDC meetings. On average, the Land Use Specialist spends 19 hours a week reviewing applications, contacting applicants for information, and preparing for HDC meetings. This is in addition to the time the Specialist spends in the actual HDC meetings.

The HDC and PLUS staff have taken steps to manage the length and frequency of HDC meetings. The HDC has designated one Land Use Specialist to administratively approve certain small repairs that make no substantive change to the building. For example, replacing a window pane with the exact type of glass. Furthermore, when the Land Use Specialist develops each meeting agenda, applications for minor changes, such as repainting an outer door in an HDC-approved color, are placed on the consent agenda.

However, even with these improvements, the HDC review is still a time-intensive process. HDC members spend hours each week reviewing applications, and members of the public can become frustrated with the length and complexity of the approval process. In the Stakeholder Survey, many respondents reported feeling that the process was too complex.

Furthermore, the Town should work to ensure that the time of residents who serve on its Boards and Commissions is used as efficiently and effectively as possible. Limiting the frequency and duration of meetings shows respect for the residents' time, maximizes the number of residents who may be willing to serve, and helps ensure that they are focusing on the most important projects and issues.

The HDC should work with PLUS staff, including the Land Use Specialist and the Director and/or Deputy Director of Planning to develop strategies for streamlining the HDC meetings and approval process. One potential process improvement would be to expand the authority delegated to the Land Use Specialist to approve certain routine applications administratively, thereby decreasing the HDC workload and speeding up the review process for minor change requests. By reviewing the previous year's consent agendas, staff

and the HDC may identify those items that were considered routine in nature, are most common, and would best streamline the process by approving administratively.

Many other HDCs in Massachusetts have delegated some level of approval authority to staff. For example, in both the Towns of Wellesley and Rockport, the HDCs do not review paint color changes, roof color and style changes, or changes to sidewalks or gutters.¹² The HDC may choose to delegate approval to the Land Use Specialist for those items that do not create a substantive change to the appearance of property such as changes to windows, fencing, roofing, sidewalks, and gutters, as well as paint color changes to structures, clapboards, and doors.

The HDC should also consider whether there may be opportunities for more projects to be reviewed as part of the consent agenda. Placing more items on the consent agenda would allow meetings to proceed more quickly, and the HDC would still retain the right to pull any consent items for further discussion if desired. The group should consider whether there are types of applications that appear on the discussion agenda that are regularly approved with minimal change, discussion, or debate. These are the types of items that the HDC should direct staff to place on the consent agenda.

Code Compliance

Recommendation 8: Develop formal processes and strategies for ensuring zoning compliance with all conditions of approval.

An important function of the PLUS Department is to ensure that construction on the Island complies with zoning and HDC requirements. External changes to buildings require HDC approval, and before a building permit is issued, every project must be reviewed by the Zoning Compliance Coordinator to ensure that it complies with the Town's Zoning Code.

Therefore, the initial vetting process for zoning and HDC compliance is extensive. However, once a structure is built, the Town utilizes a complaint-based enforcement mechanism to ensure that the property remains in compliance. If a complaint is lodged about a potential HDC or zoning violation, PLUS staff will investigate the allegation and, if merited, issue a letter informing the property owner of the violation. However, the Town does not have the staff resources for proactive code enforcement, and there are no formal standards in place for when to follow up on a warning letter or when a warning letter should lead to a citation.

Complaint-based zoning enforcement relies on Town residents to identify and report potential issues. While this minimizes the staff time required for enforcement, it relies on an educated and active resident base. Certain areas of the Town may be more closely-regulated than others, depending on the attentiveness of that area's residents to potential issues. Furthermore, certain violations of zoning and HDC requirements may be overlooked if they are not apparent to a layman. These concerns, plus the Town's lack of a formal citation procedure, likely mean that zoning and HDC requirements are inconsistently applied.

Town leadership should consider whether this level of zoning enforcement is adequate to achieve the Town's goals. Understanding the Town's goals for zoning and HDC regulations will help the Town

¹² "Section XIV.D. Historic Districts." Wellesley, MA.

<https://www.wellesleyma.gov/DocumentCenter/View/550/Section-14D---Historic-Districts-PDF?bidId=> and "Rules and Regulations Related to the Application Process." Rockport, MA.

understand the appropriate resources to devote to zoning enforcement. PLUS leadership should work with Town Administration to develop goals for zoning enforcement on Nantucket.

One option would be to continue the current complaint-based zoning enforcement process and make enforcement more consistent by implementing a standardized process for responding to a complaint. This will make the process more transparent and will help ensure that every complaint is handled in a consistent and timely manner. The process should include steps for verifying a complaint, deadlines by which an issue should be corrected, and the circumstances under which a citation is issued.

The Town also has the option of implementing a proactive zoning enforcement strategy, in which staff time would be dedicated to patrolling the Island to identify zoning violations. This option would help ensure that HDC and zoning regulations are applied comprehensively and consistently across the Island. Proactive zoning enforcement could also catch many issues before they become resident complaints.

Proactive zoning enforcement, however, is likely not possible with the Department's current staff capacity. The additional staff hours required would depend on how extensively the Town implements proactive enforcement, but proactive enforcement would require the addition of one or more positions to the Department. While this option would require additional resources, it would help safeguard the investment that the Town has made in preserving its historic character.

If the Town decides to implement proactive zoning enforcement, it should begin to track metrics to help gauge a code enforcement officer's potential workload. The Department already tracks the number of violation letters and citations issued, but other metrics to track include the following:

- The time involved to investigate each zoning and HDC complaint
- The types of complaints received
- The geographic distribution of complaints
- Whether any other Departments are receiving zoning or other code complaints

These metrics will help the Department estimate the total time required for proactive zoning enforcement on the Island. It may also be useful for the Department to proactively patrol a limited geographic area with its current staff. This will help the Department estimate how many violations are missed with the current complaint-based system that may be caught with a proactive approach that.

Staffing

Recommendation 9: Ensure that cross-training exists for the Safety and Code Compliance Division.

Developers, homeowners, business owners, and building contractors depend on PLUS to process their permit applications as efficiently and as quickly as possible. Most applications require several steps and multiple reviews and inspections by highly-specialized staff.

A project must go through a complex plan review process before it can be issued a building permit and ultimately a Certificate of Occupancy. The process map included as Attachment C illustrates the steps involved in the Town's inspection and permitting process. The process begins once an applicant submits an application for review. Staff reviews for zoning, completes plan review, issues building permits, and completes several different types of mechanical and building inspections. Once an applicant has passed all the appropriate inspections, a Certificate of Occupancy is issued for the property.

All staff in the Safety and Code Division are not cross-trained. The Zoning Compliance Coordinator, Plumbing and Gas Inspector, and Wiring Inspector are all separate positions, staffed by different individuals who are unable to back up one another. If these employees are out of the office, no other regular staff member can perform their functions. However, there are on-call inspectors to fill gaps when necessary. This is especially concerning for the Zoning Compliance Coordinator position. Other inspections can take place while waiting on another inspector's availability, but, as the process map illustrates, when the Zoning Compliance Coordinator is out of the office, the building permit process cannot move forward.

In the case of the Zoning Compliance Coordinator, a delay would put the Department at risk of failing to meet the 30-day deadline for processing building permit applications mandated in the State Building Code. Finally, the Department is vulnerable when there is staff turnover.

The Department should develop a plan to ensure that staff within the Code and Safety Division are cross-trained to the fullest extent possible. One of the recommendations included in the Town-wide Staffing Study was to have Building Inspectors review for zoning compliance as a part of their normal duties, rather than making zoning the sole responsibility of the Zoning Compliance Coordinator. If Building Inspectors can review plans and applications for zoning compliance, they will be able to backfill when the Coordinator is out of the office, thus minimizing service interruptions for customers and ensuring that the Town will be prepared to continue timely zoning review. PLUS Staff has already worked to implement this recommendation.

The State has strict certification requirements and requires that electrical inspectors are licensed electricians,¹³ plumbing inspectors are master or journeyman plumbers with at least five years of continuous experience, and gas inspectors are master or journeyman gas fitters with at least five years of continuous experience.¹⁴ However, the Department should begin to take steps to ensure backup and cross-training opportunities exist for electrical, gas, and plumbing inspections.

The Department should also consider how it will continue to effectively recruit for these positions in the longer term. The candidate pool on the Island is limited, and it can be difficult to recruit off-island due to the high cost of living on Nantucket and the challenges of commuting. Recognizing this challenge, the Department should play a more integral role in nurturing electrical, plumbing, and building expertise among the local population.

One possibility to build a pipeline of potential staff is for the department to engage with the school district to encourage training programs with high school students to build technical skills and help ensure that there is a local hiring pool with the right knowledge base for these specialized positions. The training program should include a combination of instruction and apprenticeships, with students having the opportunity to shadow inspectors and conduct inspections themselves. A training program would require staff time and other resources but would be an investment to help ensure that skilled workers are available to support the Department in the future.

¹³ MA General Laws Part I, Title XXII, Chapter 166, Sect. 32

<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXXII/Chapter166/Section32>

¹⁴ MA General Laws Part I, Title XX, Chapter 142, Sect. 11

<https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXX/Chapter142/Section11>

Communication

Recommendation 10: Conduct regular Department and Division-wide staff meetings.

All-staff meetings are an important tool for structured communication between staff and Department leadership. They create transparency by allowing managers to discuss their reasoning behind proposed policies, procedures, and initiatives with staff, as well as to solicit input on how these proposed changes would impact employees' work. They also serve as a place for employees to raise potential concerns or issues and to share their own ideas for Departmental improvements. All-staff meetings maximize the value of employees by allowing them to participate in collaborative solutions for operational issues.

Staff meetings are also an opportunity for Department leadership to share the Department's mission and goals with staff, to discuss why these goals matter, and for management and staff to think collaboratively on how they can work together to advance these goals. Shared goals can improve morale and Department cohesion by helping employees understand the impact and importance of their work and how it fits into the larger Department mission.

Currently, no regular Department-wide staff meetings are held in the PLUS Department. The Department should hold at least one all-staff meeting per year, scheduled during what is traditionally a slower time for the Department. These all-staff meetings will be an opportunity for leadership to share their plans and goals for the Department's future, for staff to react to those plans, and for staff to offer their own ideas for how the Department can function more effectively.

Ideally, the Department-wide meetings should take place over several hours. The meeting should include an opportunity for a leader from each Division to briefly share the Division's activities and accomplishments from the previous year. This will help other staff better understand the work of their counterparts. Department leadership should then share Department-wide developments and upcoming initiatives and discuss the Department's goals for the upcoming year. Staff should then have the opportunity to provide any comments, questions, or ideas on the goals. Finally, space should be given to staff during the meeting to share any ideas they have for Departmental process improvements and initiatives that would help advance Departmental goals.

The Department-wide meetings should also include space for team-building and social activities. Taking time during a meeting for an ice breaker, team activity, or a shared meal helps build morale and show leadership's appreciation for staff while also helping staff develop relationships with employees from other divisions. This strengthened bond will improve staff's ability to collaborate on a professional level.

This annual all-staff meeting should be supplemented by Division-wide meetings, held regularly at least monthly for each division. These meetings should build on the discussion at the Department-wide meetings. They are an opportunity for Department leadership to communicate with staff, share Town-wide issues and updates, and get status updates on the goals identified at the all-staff meeting, as well as discuss any questions or issues that have developed in the meantime.

Governance

Recommendation 11: Evaluate alternate structures for the Town's regional planning authority.

As mentioned previously, several Boards and Commissions work directly with the PLUS Department to help guide planning and development activity on the Island, to ensure that the Town is developed in a thoughtful manner, and to preserve the Island's unique character and charm. Currently, the Planning Board, HDC, ZBA, and NPEDC all work with PLUS. While each Board has its own roles and responsibilities, many of their functions interrelate and intersect with one another and with the Select Board.

Each body is assigned PLUS staff to serve as liaisons who are responsible for reviewing applications, working directly with applicants, developing and reviewing agenda items, preparing and posting agendas, staffing meetings, transcribing minutes, and working with Board members. Staff is also responsible for following up with Board member requests, conducting research, and developing master plans, as well as completing their regular day-to-day work. Depending on the Board, meetings are held quarterly to every other week and are often scheduled outside the normal workday. Providing support and assistance to the Boards and Commissions requires a significant amount of staff time and limits the amount of time staff can spend in the field, working with applicants, responding to requests, and completing their regular assignments.

It is important to recognize the role each Board and Commissions plays as it pertains to the Town's land use functions:

- NPEDC serves as the regional planning authority and is responsible for the Town/County's planning services.
- The HDC is responsible for the preservation and protection of historic buildings, places, and districts on the Island.
- The Planning Board is responsible for the approval of residential and commercial developments and issues various special permits and waivers as well as proposes, administers, and enforces zoning matters.
- The ZBA provides an appeal process for those applicants who were unable to obtain a permit or enforcement action, or those who need a variance or special permit from the zoning by-laws.

The greatest intersect and similarity can be seen between the Planning Board and the NPEDC. Responsibilities of a typical RPA might be starkly different from that of a Planning Board. However, in Nantucket, due to the uniqueness of the Island, both entities are responsible for addressing the Island's planning concerns and even involve many of the same players (e.g., the Planning Board members sit on the NPEDC). The Planning Board is responsible for making land use regulatory decisions, and the NPEDC focuses on addressing long-range planning issues such as transportation on the Island.

Typically, a regional planning authority consists of representatives from several member communities rather than just one, so focus and attention are placed on integrating competing priorities that exist within a region. Generally, RPAs integrate the broader regional perspective, whereas the NPEDC makes decisions and reviews plans that impact a single jurisdiction. An overview of the structure of the state's RPAs is included in Attachment F. On average, Massachusetts RPAs represent 27 member communities. The NPEDC is the smallest with only one member community, and the largest is the Metropolitan Area Planning Council with 101 communities.

The NPEDC was established in 1973. Since then, other governance changes have occurred on Nantucket that have professionalized Town operations. For example, in 1996, the Town adopted a Home Rule Charter and the position of Executive Secretary became Town Administrator. Subsequently, the position of Town Administrator was changed to Town Manager in 2007, and the duties and responsibilities of the position were expanded to define its executive functions. Additionally, the 2007 amendment to the Town Charter further consolidated Boards and Commissions as part of Town administration, including the following:

- Board of Appeals
- Conservation Commission
- Historic District Commission

- Planning Board

The 2012 MOA between the Town and the NPEDC represented a major step to enhance organizational effectiveness by consolidating planning and land use functions under a single department director and assigning oversight functions for the Director of Planning to the Town Manager.

The issues and needs of the Island are unique and unlike those of a metropolitan or larger planning area, which results in the RPA functioning and operating differently. Recognizing these differences and the uniqueness of Nantucket merits a discussion of how the Nantucket RPA should best be structured to meet the needs of the community. As the Town's population and economic and environmental landscape change, it may be appropriate to evaluate the following: (1) whether the NPEDC is the appropriate agency to serve as the RPA for Nantucket; and (2) should it have hiring authority and determine conditions of employment for employees who report to Town Administration. It should be noted that any modifications to the RPA structure would require special legislation. Regardless of how an evaluation proceeds, it will be important to ensure that the governing body that is considered has the capacity to take on the additional roles and duties. It will also be important for the Town to maintain its RPA designation to ensure its eligibility for future grant and other funding.

An alternative structure for the RPA could provide both efficiencies and clarity within PLUS by consolidating Planning functions under a single Board and, subsequently, reducing the number of Boards and Commissions and the amount of time spent providing administrative and staff support. In addition, PLUS operations would be centralized within the organization, with the Director of Planning clearly accountable to the Town Manager, like other department directors. An MOA would no longer be necessary to guide PLUS operations. It would also eliminate any confusion regarding which governing body has the authority to make planning decisions for the community. This change would involve modifications to State Law and Town Code.

Alternatively, the Town could choose to modify the MOA between the Town and the NPEDC and clarify that the Town Manager is the appointing authority for the Director of Planning. The current MOA establishes lines of accountability between the Town Manager and the Director but does not allow the Town Manager to establish conditions of employment (set pay rates, etc.) nor does the Town Manager have the ability to appoint the Director. This option could be implemented over time to allow the current employment agreements with the Director of Planning and Deputy Director of Planning to expire or when the incumbents leave their current positions.

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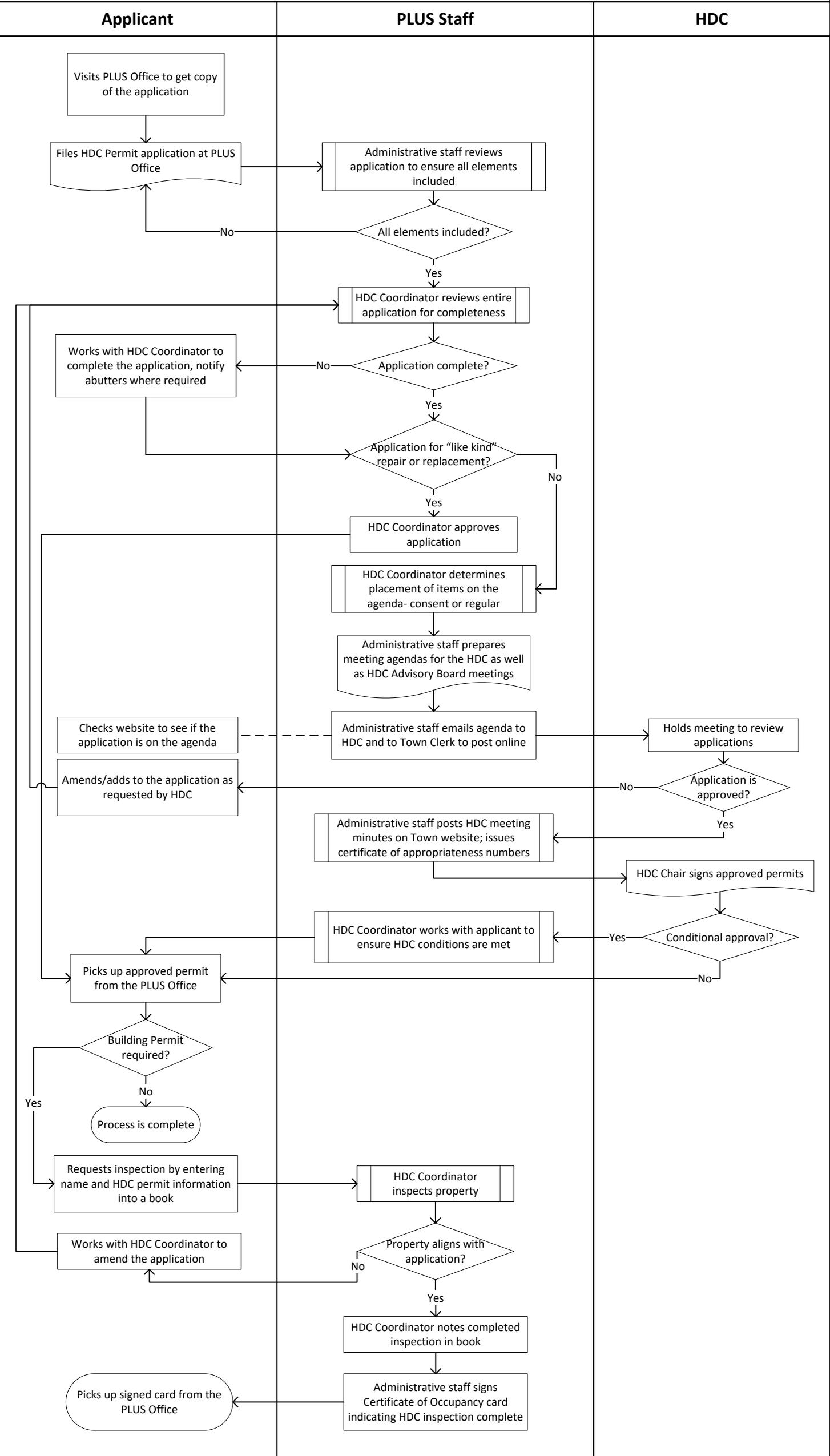
Conclusion

The PLUS Department is poised for continued success. The Department is fortunate to have staff who are responsive and committed to ensuring that applicants receive outstanding customer service and have a positive experience when interacting with the Town. The PLUS Department is dedicated to providing quality land use, plan review, and building inspections to guarantee that development on the Island is of superior quality and that it preserves and maintains Nantucket's unique charm and character. The recommendations contained in this report identify opportunities that, if pursued, will build upon the strengths of the Department.

While many of these recommendations will require a short-term investment of staff time and potentially other resources, in the long-term, these recommendations are intended to assist the Department to more efficiently and effectively achieve its goals.

Attachment A: HDC Approval Process Map

Town of Nantucket, MA Historic District Commission (HDC) Application Approval Process



Application due Wednesday before meeting

Agenda posted Friday before meeting

"Like kind": replacements that do not change materials or aesthetic

Meeting held Tuesday; overflow meeting Thursday as necessary

Inspection process averages 10-14 days

Attachment B: Planning Board Approval Process Map

Town of Nantucket, MA Planning Board Application Approval Process: Items Requiring Public Hearings

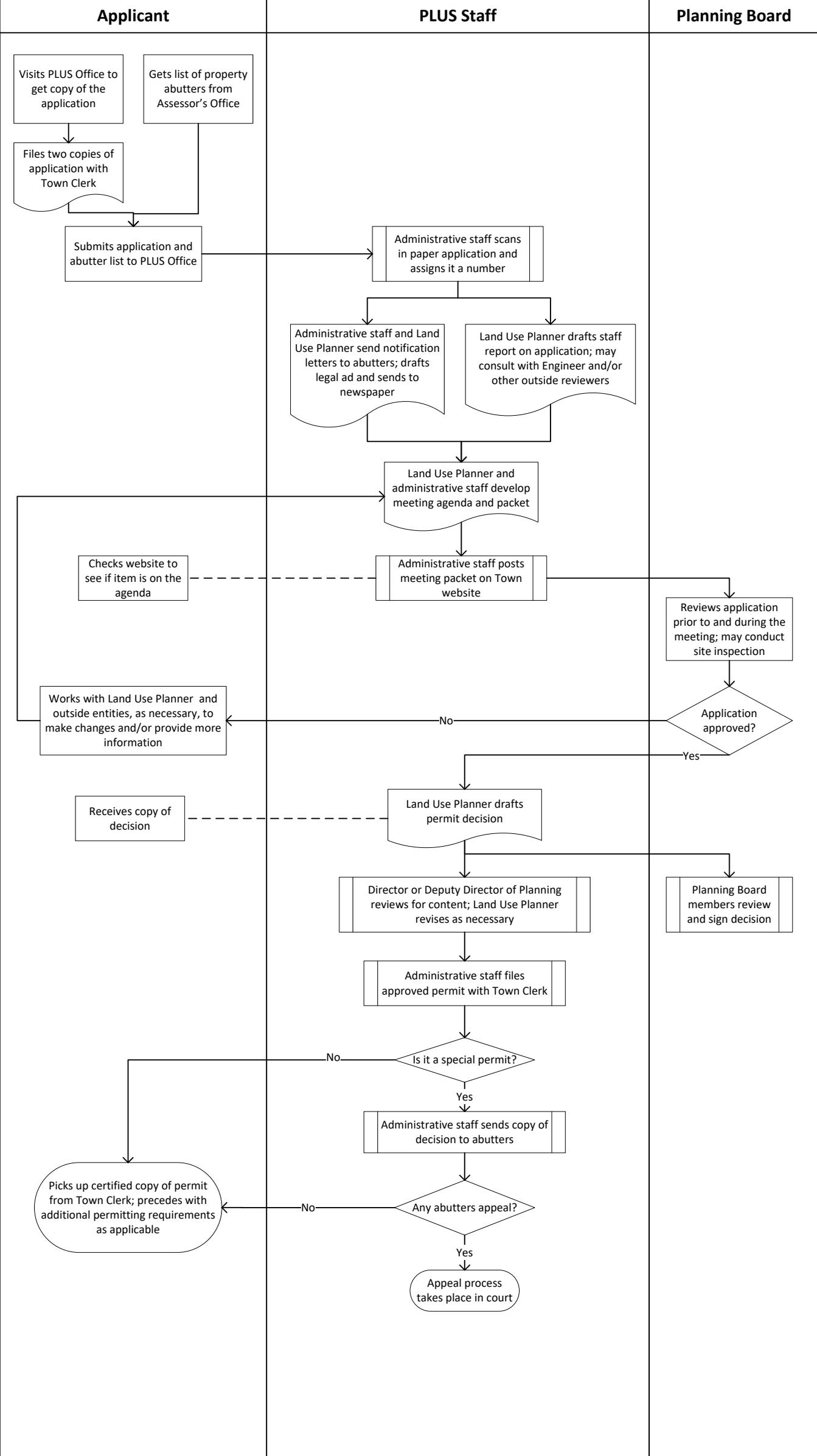
For special permits applications, a 145-day deadline for processing begins when application is filed with the Clerk

The Planning Board may request application review from outside entities like other Town departments, Boards, or consultant engineers

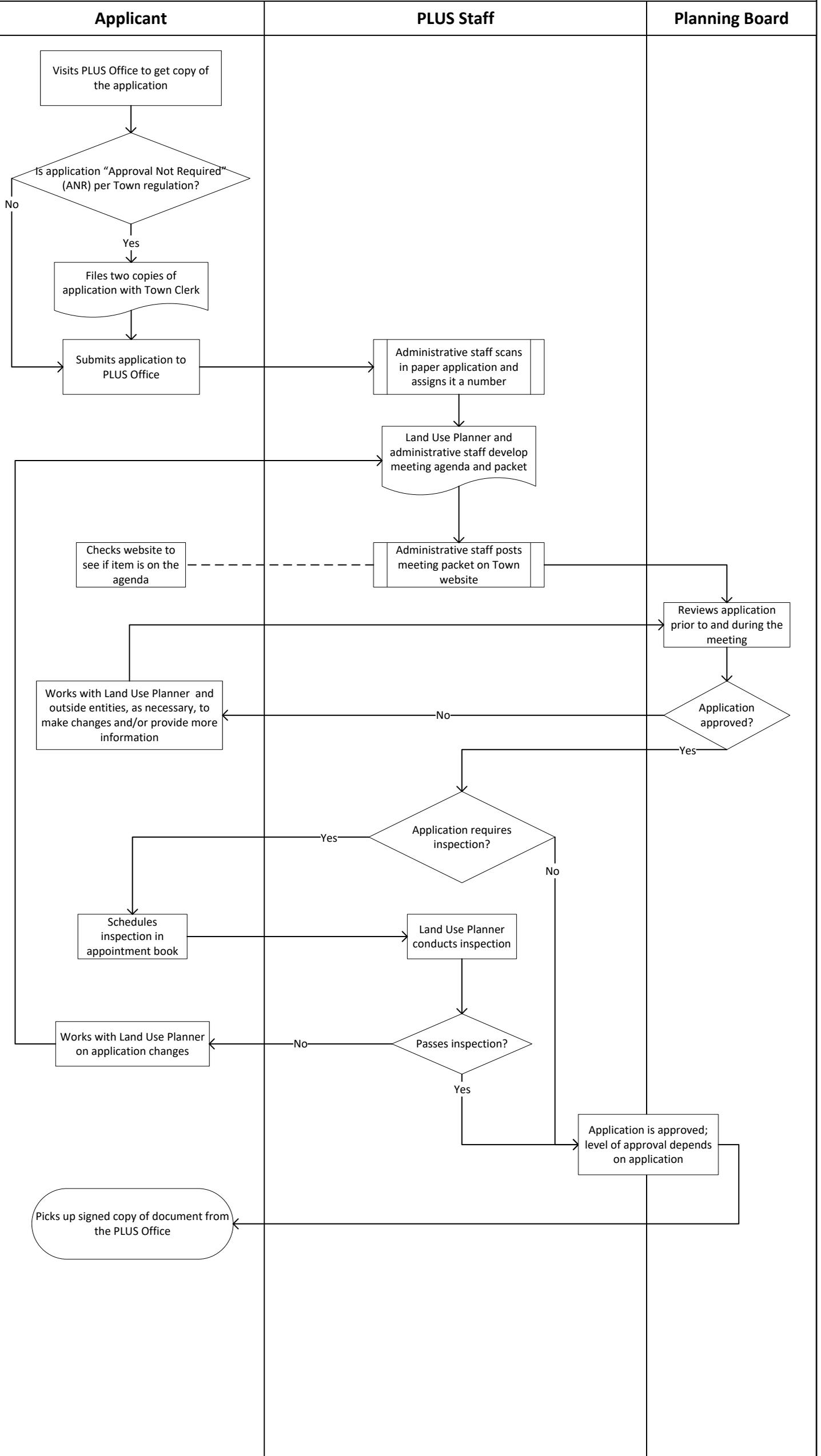
The legal notice is also considered notice to the applicant; required at least 14 days before hearing

The agenda for public hearing items must be published at least 48 hours before the meeting; non-public hearing items can be submitted with less than 48 hours notice

After a permit is filed, abutters have 20 days to appeal



Town of Nantucket, MA Planning Board Application Approval Process: Items Not Requiring Public Hearing (e.g. preliminary plans, secondary dwelling permits, "Approval Not Required" items)



For subdivision permit applications, a 90-day deadline for processing begins when application is filed with the Clerk

Applications that require inspection include applications for secondary and tertiary dwellings

Different application types require different levels of approval: Land Use Planner, PLUS leadership, or Planning Board

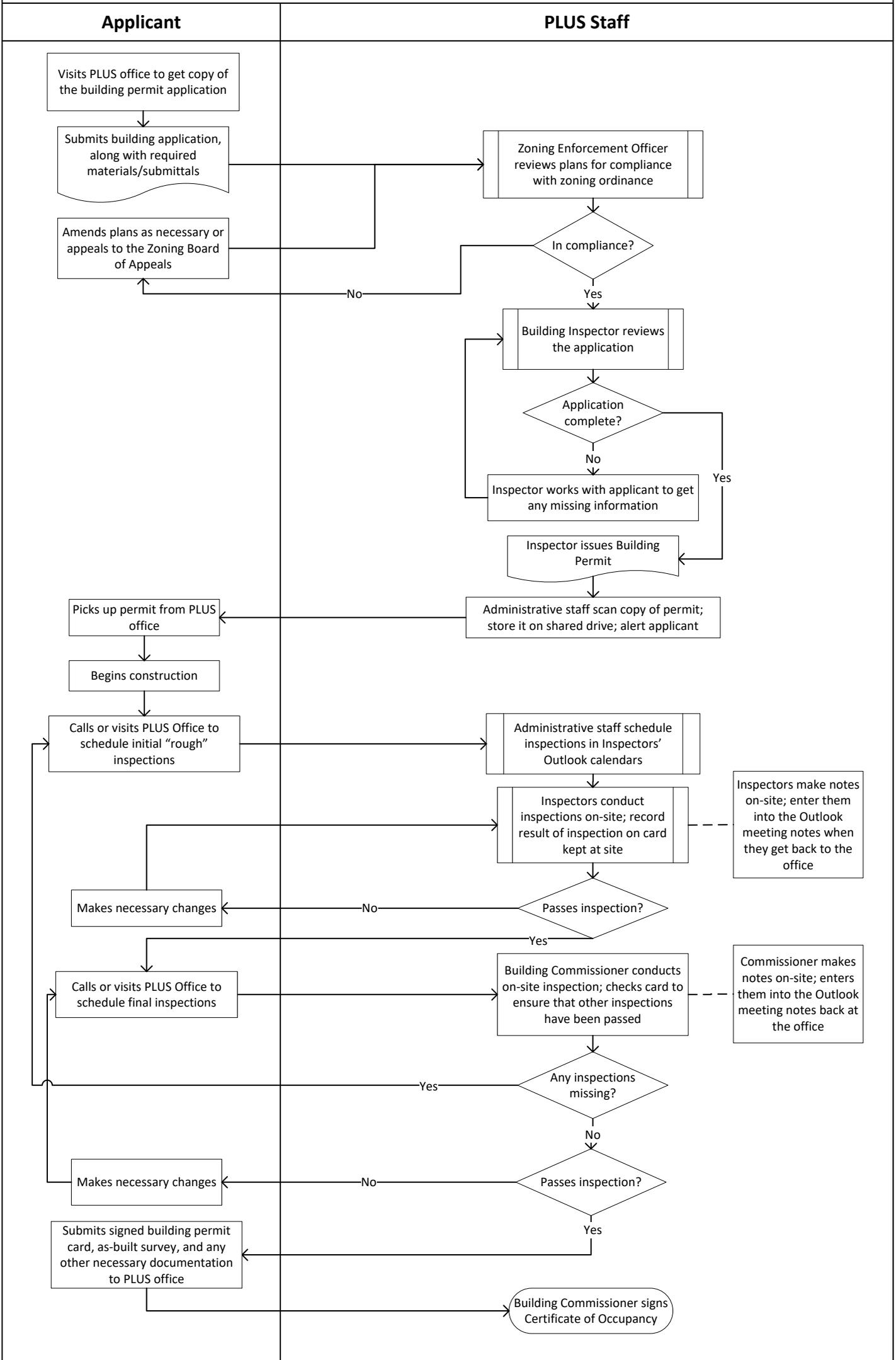
Attachment C: Building Permit/CO Process Map

Town of Nantucket, MA Building Permit and Certificate of Occupancy Process

Before beginning this process, an applicant must have already completed the following processes, as applicable:

- Historic District Commission approval
- Septic Permit approval from the Health and Human Services Department
- Sewer Entry Permit approval from the Sewer Department
- Water Well Completion Report from the Health Department
- Conservation Commission approval
- Zoning Board of Appeals approval
- Second Dwelling approval from the Planning Board
- Subdivision Lot Release Form (Form J) from the Planning Board
- Driveway Access Form from the Department of Public Works
- Fire prevention inspection from the Fire Department

The applicant is responsible for initiating the necessary processes and for gathering the required documentation.



Electric inspections should be done before Framing, which should be done before Insulation; no required order for the other inspections

Building Code requires building permit applications be reviewed and processed within 30 days of submittal

Inspections include footing, HVAC, plumbing, electrical, frame, and insulation

Attachment D: Sample of Development Review Information



CONCEPT REVIEW CHECKLIST

The following checklist serves as an outline for applicants to ensure that adequate information is submitted for staff to review the proposed concept. If an item is not checked, a detailed narrative outlining reasons why the item has not been submitted shall be included. Additionally, in order to answer any questions that staff may have concerning the proposed concept, it is imperative that either the applicant and/or the applicant's representative be in attendance at the staff meeting. Likewise, be prepared to make a brief presentation with graphic displays pertaining to your project for the staff to receive information regarding your project. Please submit completed application and materials to planningtechs@windsorgov.com.

SUBMITTAL REQUIREMENTS FOR CONCEPT REVIEW MEETINGS:

	Planning Department Checklist	*Applicant Checklist	
1	_____	_____	Completed checklist with property owner's signature or owner's authorized representative
	_____	_____	Narrative description of proposed concept. For site plans include proposed number of employees, type of business, number of units, etc. Narrative shall also include a description of all structures to be built on the site including: size quantity, use and number of units per structure. For residential include proposed number of lots, lot sizes, density (single family, multi-family, etc.)
	_____	_____	Concept drawing, including all information required below

CONCEPT REVIEW CHECKLIST:

	Planning Department Checklist	*Applicant Checklist	
2	_____	_____	Concept drawings shall be legible and accurately drawn to an appropriate scale
	_____	_____	Indication of drawing scale and symbol designating true north
	_____	_____	Property Address, legal description (<i>township, range, section, lot, block, subdivision</i>) or location depicted on a vicinity map
	_____	_____	Names, addresses and phone numbers of the applicant and firms or person responsible for preparing the drawing
	_____	_____	Building height(s)
	_____	_____	Indication of proposed landscape areas depicted by cross-hatching of areas (<i>actual plant materials and details not required for concept review</i>)
	_____	_____	Distances from proposed and existing structures to all property lines
_____	_____	The location and dimensions of all proposed and existing easements, rights-of-way, access points, paved areas, structures and their uses, water facilities, sewer and storm drainage	

3	All correspondence will only be sent to those listed above. It is the sole responsibility of those listed to distribute correspondence to other applicable parties.	
	<i>I hereby depose and state under the penalties of perjury that all statements, proposals, and/or plans submitted with or contained within the application are true and correct to the best of my knowledge.</i>	
	*Signature: _____	*Date: _____

(Proof of owner's authorization is required with submittal if signed by Applicant)

*Print Name: _____ *Required fields

Revised 8/1/2016



Planning & Community
Development

17500 Midvale Avenue North
Shoreline, WA 98133-4905
206-801-2500 [phone]
206-801-2788 [fax]
pcd@shorelinewa.gov
www.shorelinewa.gov

Construction Permit Frequently Asked Questions



Homeowners thinking about remodeling their home or adding other improvements, such as decks, roofs, garage, or retaining walls, often have questions about building permits.

The information contained here is designed to help homeowners know when construction permits and other approvals are required by the City of Shoreline. It also answers some of the most frequently asked questions and offers tips from the City.

Since each construction project is unique, we invite you to call the Planning & Community Development information line at (206) 801-2500 for answers to your specific permitting questions. You can also e-mail Planning & Community Development at pcd@shorelinewa.gov.

What are permits and why do I need one?

Permits are the way the City of Shoreline makes sure all construction or improvement projects meet the applicable rules and regulations. The process is designed to ensure all construction in the City is done properly for the safety of building occupants. In addition to Shoreline codes, there are other federal, state, and local laws that govern construction. A comprehensive list is available at <http://shorelinewa.gov/codes>.

There are several different types of permits, based on the type of construction: structural, plumbing, mechanical, right-of-way (driveway), and electrical. Most homeowner projects require a combination of permits. In addition, the complete demolition and relocation of buildings also requires permits.

Hours of Operation:

Monday 8:00 am–5:00 pm
Tuesday 8:00 am–5:00 pm
Wednesday 1:00 pm–5:00 pm
Thursday 8:00 am–5:00 pm
Friday 8:00 am–5:00 pm

Permit Processing Ends at 4:00 pm Daily

Obtaining the permit is not the first step in the process. First, you will want to thoroughly define the project to determine the type of process that may be used to evaluate the proposal. Based on the scope of work, you may need to prepare plans to submit, draw a site plan for your property showing the improvements, and show the type of construction you will be using. The City has [Development Handouts](#) to help you through this process.

Once plans are approved, you are required to build the project to those plans. If any changes are made to the plans, they must be made with the City's approval through the revision submittal process.

The second half of the process is the inspection of the work.

When don't I need a permit?

A construction permit is not needed for items such as: wallpapering, painting or similar finish work; fences six feet high or lower; platforms, decks and walks 30 inches high or less above grade or not over basement; and in several other cases. For specific exceptions review the [Permit Exemptions](#) handout. However, reviews may be required from other agencies; be sure to check with us before starting any construction.

Replacement or repair of some fixtures, such as changing water faucets or replacing switches, does not normally require a permit. Replacing a water heater or adding a new permanently wired light fixture does require a permit.

When do I need a construction permit?

A construction permit is needed for all new construction. If you are just repairing or replacing fixtures in the same location or replacing windows (same size, same location), you will most likely not need a permit. However, if you are making additions or changes to an existing system, such as plumbing or wiring, you may need a plumbing, electrical, or mechanical permit. For example, moving and/or adding an electrical outlet requires an electrical permit.

To find out if your project needs a permit review the [Permit Exemptions](#) handout.

Where do I get a permit?

Construction permits are issued at the City's Permit Services Center in City Hall, 17500 Midvale Avenue N, third floor.

If you only need simple permits for minor work, such as installing a water heater, permit applications may be submitted electronically. To find out if you can submit your permit electronically, review the [Electronic Applications](#) handout.

How long does it take to get a permit?

Permit issuance periods vary. Some minor projects can be fully permitted over-the-counter meaning a return trip may not necessary. However, most projects require you to leave your plans for additional review. Review the [Express Permit-Residential](#) for information on express permitting.

What should I know about zoning?

Zoning identifies, within a defined area, the height of buildings, how much building and hardscape (man-made surface) coverage is permitted, minimum lot sizes, and front, rear, and side-yard setbacks (the area between a structure and a property line or protected area). For example, a residential area may be zoned R-6 with the general parameters listed below.

<u>R-6 Zoning Requirements</u>									
Base Density: Dwelling Units/Acre	Min. Density	Min. Lot Width	Min. Lot Area	Min Front Yard Setback	Min. Rear Yard Setback	Min. Side Yard Setback	Base Height	Max. Building Coverage	Max. Hardscape
6 du/ac	4 du/ac	50 ft	7,200 sq ft	20 ft	15 ft	5 ft	30 ft (35 ft with pitched roof)	35%	50%

Properties with different zoning have different parameters. You can view zoning and other information by visiting the King County Assessor's website at <http://info.kingcounty.gov/Assessor/eRealProperty/Default.aspx>.

Some questions and approvals for zoning can be provided over-the-counter by the staff reviewing your building plans.

There are many land use requirements within the City, such as whether an area is for residential or commercial use. Understanding how your property is zoned is important to understand before you start any major work on your property. We can answer questions about these requirements.

What about other approvals or permits?

Other government agencies may need to review and approve your project. The City will inform you of these reviews at the time plans are submitted and they may be outlined in the submittal checklists. You can also review the [Plan Review](#) handout to see what other agencies may be involved.

What if I don't get a permit?

Failure to obtain a permit before construction begins is a violation of the City's codes and regulations and could subject you to fines and penalties. You'll be required to obtain permits for the work and it must pass inspection, or you must return the structure or site to its original condition. Permit fees may be doubled as a penalty. A separate Investigation Inspection permit will also be required before submittal of the building permit to correct any construction started without permit.

Construction codes were created for safety reasons. Work built without a permit can be unsafe, no matter how good it looks.

Who should obtain the permit?

It is the responsibility of the property owner to make sure all proper permits are obtained. However, contractors licensed by the State of Washington or your agent can obtain the permits on your behalf.

Can I apply for a permit for my mother, aunt, or a friend?

Yes. To obtain a permit for someone else, you will be acting as their agent and an authorization letter may be needed.

Can I do the work myself or do I have to hire a contractor?

You, as the property owner, can do the work yourself; however, you must follow the same codes and regulations as a contractor would. Such requirements include:

- **Build to the plans:** Be sure to follow your approved plans, whether they are drawn by an architect or designer or are standard construction requirements given to you by the city. If you change the plans while building the structure, problems may arise when the project is inspected. If you do decide to make changes, check with the City's plan review staff or your field inspector. For most building design changes, the revision re-submittal process will need to be followed.
- **Calling for inspection:** You must call for inspections as required by your permit as the work is completed. Failure to obtain the proper inspection can delay the completion of your project.
- **Obtaining final approval:** Once the construction is completed, you must seek final approval.

If you choose to perform the work yourself, you will be required to complete and sign an "Owner Affidavit Regarding Contractor Registration" form.

What do I need to know about hiring a contractor?

The City recommends that you deal only with a contractor licensed by the State of Washington. Visit the Department of Labor and Industries website at <https://fortress.wa.gov/lni/bbip/> to search for licensed contractors or contact them at (425) 990-1400. If you plan on hiring a contractor, please see Washington State's [Hiring a Contractor](#) brochure.

Who draws up the plans?

Plans for projects such as room additions can usually be drawn up by qualified individuals such as a draftsman or by the homeowner. Other projects may require plans prepared and signed by an architect or engineer licensed by the State of Washington. Please contact our office for more information regarding hiring a design professional for your project.

For routine projects such as demolition, re-roofing, and driveway, the City has standard specifications that can be followed within certain limitations. Those specifications, together with a site plan showing your project, are accepted by the department as plans.

In addition, some kit-type projects for sunrooms or sheds come with construction plans. Before you buy, contact Planning & Community Development to make sure your kit is acceptable for permitting.

What about inspections?

It is the homeowner's responsibility to insure that inspections are requested and obtained at specific times during construction. You may have your contractor make the call, but it is still the homeowner's responsibility to make sure the inspections are made. Inspections are made during certain points in the project, depending on the work that's being performed. For example, inspections of foundation footings need to be made after forms are set and steel placed but before pouring concrete.

Remember, the project is not complete for legal purposes until it has passed the final inspection. For more information, review the [Inspection Summary](#) handout.

What if I have a permit but never called for an inspection?

Generally, permits expire after 180 days if no inspections have been made. In order for the project to be complete, it must pass final inspection. If a permit expires before final inspection, the project is in violation of City codes. If you would like help reactivating your permit or applying for another one, please contact Planning & Community Development. We will try to help with as little inconvenience as possible. Our interest is in seeing your project complete, including the final inspection. Once the permit has been reactivated or a new one has been issued, call (206) 801-2545 to request a final inspection.

Am I required to have an inspection?

Yes. All permits require inspections. The project is not legally complete until it passes the final inspection.

How do I schedule an inspection?

Once you have received your permit approval, you can request an inspection by calling our Inspection Line at (206) 801-2545 or going to [Inspection](#) to schedule one online.

What are mechanical and plumbing permits?

Mechanical and plumbing permits are authorizations to repair or construct mechanical and/or plumbing systems. Permitted work must comply with the adopted code. Inspections are required for both permit types.

Examples of work requiring a mechanical permit include adding or replacing a furnace (wall or floor), heaters, air conditioners, appliance vents for chimneys, refrigerator compressors, boilers, chillers, fan coil units, heat pumps, air handlers, duct work, ventilation fans and systems, and exhaust hoods and ducts.

Examples of work requiring a plumbing permit include addition, installation, or replacement of any plumbing fixture, such as water heaters, sinks, and water softeners.

What is an electrical permit?

An electrical permit is an authorization to repair or construct an electrical system. The permits are available from the [Department of Labor and Industries](#).

Permitted work must be in compliance with the adopted edition of the electrical code. An inspection is required for each permit and performed by the Department of Labor and Industries.

Examples of work requiring an electrical permit include installation of new electrical outlets, moving electrical outlets or switches, adding or replacing circuits, adding or replacing phase services, installing a temporary power pole, or adding new "hard wired" electrical appliances or fixtures.

How long does it take to process a simple permit?

Our goal is to process simple permits such as plumbing and mechanical as they are received daily. During high-volume periods, processing requests may take up to three business days, but the turn-around time is generally faster. Invalid or incorrect information on the request will cause delay. Applications for walk-in customers will be processed while you wait.

What credit cards can I use?

The City only accepts MasterCard and Visa.

When does my permit expire?

Work must begin and an inspection made within 180 days, otherwise the permit expires. Every time you pass an inspection your permit is extended for another 180 days from the date of the passed inspection.

How do I check to see if a contractor is in good standing?

The Washington State Department of Labor and Industries licenses contractors in Washington State. You can check to see if a contractor is in good standing by visiting <https://secure.lni.wa.gov/>. The City will not issue a permit to unlicensed contractors or a contractor with an expired license.

What codes does the City use?

The City has adopted or amended several codes that effect development. Our [Standards and Regulations](#) development handout provides a comprehensive list of the codes and ordinances.

Where can I find out more about permits and developing?

For more information on obtaining permits or the development process visit us at City Hall, 17500 Midvale Avenue N., Planning & Community Development department or checkout our website at <http://shorelinewa.gov/planning>.

Are there construction hours in Shoreline?

The City does not specifically regulate the hours during which construction can occur. What the City does regulate is the sounds emitted by construction activity. Noise and sounds originating from construction sites is considered a public nuisance. The sounds include sounds from construction equipment, power tools, and hammering. To minimize the impact the City has limited the timeframe when the sounds can be generated between the hours of 7:00 a.m. to 10:00 p.m. on weekdays and 9:00 a.m. to 10:00 p.m. on weekends. Complaints regarding noise outside of these hours should be filed with the Police Department.

How can I check the status of my permit or find out about other permits in my area?

Information on specific permits or addresses can be reviewed using our [Permit Search Tool](#) on the Planning & Community Development website. You can search by permit number, address, applicant, owner, etc. to check details of specific permit applications.

Welcome to City of Shoreline's Permit Listings search page. This permit search tool (click link below) covers the City's permits and projects database going back to January 2001. To obtain permit and project information between 1995 and 2001, contact the City of Shoreline Department of Planning & Community Development at PCD@Shorelinewa.gov or (206) 801-2500.

[PERMIT SEARCH TOOL](#)

If you have any questions about the permitting process please contact Planning & Community Development at (206) 801-2500.



DEVELOPMENT REVIEW INTAKE REQUEST FORM

Planning

LATE CANCELLATION

Intake Fee Collection Date:

Fee Collected By:

Appointment Scheduled For:

INTAKE REQUEST INSTRUCTIONS

General Information: Site Plan/Plat Intake for new submittals occurs on Tuesday(s) by appointment for all plan types except Re-reviews, Level 1 site plans, and Exempt Plats. In order to be scheduled for an appointment this form will need to be completed and submitted along with a \$500 intake fee a minimum of 5 business days in advance of the requested appointment. *(The \$500 fee will be credited towards the application fee for the submittal.)* **Once the intake appointment has been scheduled the intake fee is tied to that submittal appointment and is not transferrable to another submittal.**

Appointment Scheduling: Submittals are accepted by appointment ONLY every Tuesday *(with the exception of holidays or other instances when City Hall is closed)*. Appointments are available between the hours of 8:30 – 11:30AM and 1:00 – 4:00PM on a first request first choice basis. The Intake Request Form and \$500 fee can be submitted to the Development Services Center. Please contact the Development Services Center [<https://dsc.durhamnc.gov>] at 919-560-4137 for assistance with scheduling an appointment. (Please be aware that if you are more than 15 minutes late your appointment will need to be rescheduled.)

Appointment Re-scheduling/Cancellation: Intake appointments must be rescheduled or cancelled **no later than 48 business hours in advance of the scheduled appointment**. Appointments that are rescheduled or cancelled later than 48 business hours in advance will be classified as a *"late cancellation"*. "Late cancellations" forfeit the \$500 intake fee and will be required to submit a new \$500 intake fee before the appointment is rescheduled/scheduled.

APPLICANT/ PRIMARY CONTACT PERSON

Name:	Company:
Phone:	E-mail:

GENERAL PROJECT INFORMATION (attach additional information if necessary)

Project Name:			
Project Description:			
Address(s):			
PIN(s) or PID(s):			
Submittal Type:	<input type="checkbox"/> Level 2 Site Plan	<input type="checkbox"/> Level 3 Site Plan	<input type="checkbox"/> Level 4 Site Plan
	<input type="checkbox"/> Major Site Plan	<input type="checkbox"/> Preliminary Plat	<input type="checkbox"/> Final Plat

COMPLETENESS REVIEW (Staff Use Only): *"☑" Required and Provided; "☒" Not Provided; "N/A" Not Applicable*

Intake Date:	Completeness <input type="checkbox"/> Pass <input type="checkbox"/> Fail	<input type="checkbox"/> Utility Impact Analysis (UIA)
<input type="checkbox"/> Complete most recent version of Submittal Application		<input type="checkbox"/> Correct number of folded plan sets and required digital information
<input type="checkbox"/> Amendment determination documentation, amendment items listed on cover, and amended items graphically designated on plans		<input type="checkbox"/> Correct review fee payment (<i>cash, credit card, and/or check made payable to "City of Durham"</i>)
<input type="checkbox"/> Jurisdiction (City or County) – County projects located in the RTP or Treyburn, and/or no utility extensions proposed (ex. No proposed water, sewer, or fire related connections to water proposed) can be accepted. Utility extensions for county projects require proof that application for annexation and rezoning have been submitted.		<input type="checkbox"/> Architectural elevations (for projects in design districts, all non-industrial, non-residential buildings over 100 feet in length visible from a public street or adjacent residential, or as required by zoning development plan) and parking plans for parking garages
<input type="checkbox"/> Stormwater calculations, including Stormwater Impact Analysis (SIA) or a sealed, signed letter from a Professional Engineer or Registered Landscape Architect		<input type="checkbox"/> Stormwater checklist (sealed & signed) for the correct jurisdiction (or both as applicable)
<input type="checkbox"/> USGS maps (legible with site drawn to scale)		<input type="checkbox"/> FIRM panel map (legible with site drawn to scale)
<input type="checkbox"/> Waiver for plans with pending Rezoning/ Development Plan and/or Annexation Applications		<input type="checkbox"/> Floodplain Development Permit if Development/ disturbance is proposed in the floodplain



CERTIFICATE OF APPROPRIATENESS APPLICATION INSTRUCTIONS

Why is a Certificate of Appropriateness (COA) Required?

When a property is located in a local historic district **OR** is a locally designated historic landmark the property owner is required to receive prior approval for exterior changes. This approval is called a Certificate of Appropriateness (COA) and it is required whether a building permit is needed or not.

What Type of Work Requires a COA?

While some changes are considered to be routine maintenance and thus require no prior approval, others must be approved by the Durham Historic Preservation Commission (HPC) or administratively by the Planning Department staff.

Work that requires a COA: A list of the types of approval required based on the scope of work can be found at: <http://durhamnc.gov/DocumentCenter/View/1347>.

Classifications in this list are based on the scope of work, project scale, and amount of deviation from historic materials and methods. Refer to this list to determine the correct level of COA approval required for the scope of your project.

Routine Maintenance (does not require a COA): A COA is not required for routine maintenance of historic properties, although other permits may be required. Activities considered to be routine maintenance include:

For All Properties:

1. All interior work as long as it has no exterior impact (i.e., window replacement is not considered interior work for these purposes)
2. Minor repairs to windows, including caulking or reglazing and replacement of window glass as long as window size and style are not altered
3. Minor repairs to doors, siding, trim, gutters, flooring, steps, fences, and walls, as long as the replacements match existing materials in scale, style, design, and materials
4. Roofing, foundation, and chimney work, if no change in appearance occurs; replacement of roofing material with matching material
5. Removing screen doors or storm doors
6. Caulking and weather stripping
7. Exterior painting of a previously painted surface, including when a change of color is proposed
8. Replacement of existing mechanical equipment (including vents)
9. Repairing or repaving of flat paved areas, such as driveways, walkways, and patios, if the material used is the same or similar in appearance
10. Installing landscaping, including vegetable, flower, and rain gardens, shrubs, and trees. Landscape maintenance, including pruning trees and shrubs (this does not include removal of landscaping required to screen mechanical equipment or utilities)
11. Curb, gutter, and pavement work that follows the Public Works Procedural Approach for Preserving Granite Curbs in Historic Districts
12. Removal and/or replacement of street trees in the right-of-way with review and approval by the Urban Forestry Manager
13. Non-fixed elements (that can be moved without the use of heavy equipment) such as rain barrels, planters, dog houses, bird baths, and similar decorative or functional items.

For Noncontributing Properties:

1. Painting of nonhistoric material, whether previously painted or not
2. Installation of prefabricated outbuilding or outbuilding of 80 square feet or less when located in the rear yard
3. Modifications to or demolition of outbuildings
4. Addition of new rear decks or porches
5. Modification, installation, or replacement of windows and doors not facing the street
6. Addition of screen doors or storm windows
7. Alteration or replacement of roof materials
8. Installation of skylights and solar panels not visible from the street
9. Installation of gutters
10. Alterations to ornamentation or to cladding material

What is a Minor COA?

A Minor COA application can be approved at the staff level and does not require a meeting of the HPC. Staff nevertheless reserves the right to determine, upon review of the application, that the request cannot be approved administratively and must be scheduled for a hearing before the HPC.

What is a Major or Master COA?

A Major or Master COA application requires review through the HPC. The HPC will hold a quasi-judicial hearing of the application. It will review the information, take testimony from the applicant and any other persons wishing to speak on the matter, and can either continue the hearing, approve the request (with or without modifications), or deny the request.

Can a COA decision be appealed?

Yes. Appeals are taken to the Durham Board of Adjustment and must be filed within 30 days of the decision, and then may be further taken to Superior Court.

Application Instructions:

1. **Pre-submittal Meeting Requirement:** Prior to submitting an application for a Major or Master COA, the applicant is required to meet with staff to review the proposed request. Applications are considered incomplete and will not be accepted if the required pre-submittal meeting has not been held. To schedule a pre-submittal meeting, contact Karla Rosenberg at 919-560-4137, ext. 28259 or Karla.Rosenberg@DurhamNC.gov.
2. **The application must be complete.** Refer to page two of the application for detailed requirements.
3. **Applicable Criteria and Standards:** Proposed work in historic districts and for historic landmarks is evaluated against the adopted [Historic Properties Local Review Criteria](#). Please refer to the specific criteria and standards that may apply to your project. Applicants are required to explain how their project conforms to the applicable standards.
4. **Submittal Deadlines:** Minor COA applications are reviewed and approved by staff and may be submitted any working day during regular business hours. Major and Master COA applications are reviewed and approved by the Durham Historic Preservation Commission, and are scheduled for a hearing five weeks in advance of the next available hearing date only when the application is considered complete and free of comments (allow at least one additional week to receive staff comments).
5. **Site Visits:** As part of the evaluation of your COA application, staff may visit your property to better understand site conditions pertaining to your request.

Who can I contact if I have any questions?

Please contact Karla Rosenberg at 919-560-4137, ext. 28259 or Karla.Rosenberg@DurhamNC.gov.



MINOR

CERTIFICATE OF APPROPRIATENESS APPLICATION



Property Information		
Case Number (STAFF ONLY):		PID:
Site Address:		Local Landmark: <input type="checkbox"/> Yes <input type="checkbox"/> No
Local District:	Classification: <input type="checkbox"/> Contributing <input type="checkbox"/> Non-Contributing <input type="checkbox"/> Not listed	
National Register District:		Tax credit project? <input type="checkbox"/> Yes <input type="checkbox"/> No
Amending a previously approved COA? <input type="checkbox"/> Yes <input type="checkbox"/> No		Prior COA Case #:
Scope of Work (check all that apply): <input type="checkbox"/> New Construction (<i>new accessory structure</i>) <input type="checkbox"/> Demolition (<i>razing of an accessory structure</i>) <input type="checkbox"/> Addition (<i>expansion of an accessory structure</i>) <input type="checkbox"/> Sign(s) <input type="checkbox"/> Modification(s) (<i>exterior changes to a structure</i>) <input type="checkbox"/> Site Work (<i>e.g., paving, plantings, site infrastructure</i>) <input type="checkbox"/> Master (<i>only applicable to City-, County-, or public utility company-owned properties</i>)		
Request Type: <input type="checkbox"/> Minor COA <input type="checkbox"/> Dual Application: Minor COA and Architectural Review		Retroactive? <input type="checkbox"/> Yes <input type="checkbox"/> No
Property Owner		
Name:		Telephone:
Contact Person:		Email:
<p>Certification: I (We), the undersigned, do hereby make an application for a Certificate of Appropriateness (COA) for the following proposals and plans to be undertaken within the boundaries of a Durham Historic District or Landmark.</p> <p>I (We) also understand that all the required information must be supplied for this application to be considered complete and valid for a Certificate of Appropriateness.</p>		
_____ Owner Signature <i>(Signatures must be original and of the current property owner)</i>		_____ Date
Applicant (if different than Property Owner)		
Name:		Affiliation:
Contact Person:		Telephone:
Address:		Fax:
City/State/ZIP:		Email:
Tracking Information (Staff Only)		
Date received:	Received by:	Fee:
Case Planner:	Final Action:	Action Date:

Application Attachments Checklist

	Quantity	Staff Use
<p>The following items must be submitted as part of this application:</p> <p>(Submit digital application material on CD or flash drive or via e-mail directly to the staff below.)</p>		
<p><input type="checkbox"/> Scope of Work Description: Describe the specific change(s) being proposed, including all elements or components being added, removed or changed. List dimensions, materials, and finishes for all components of the project. Be as detailed and clear as possible. Staff can provide examples of scope of work descriptions upon request.</p> <p>NOTE: Items which are not listed in the scope of work will not be able to be approved and may require a separate COA or dual application and fee(s).</p>	<p>1 hard copy</p> <p>1 digital copy</p>	
<p><input type="checkbox"/> Historic Properties Local Review Criteria Compliance Statement: Provide a written description of how the project complies with the applicable Historic Properties Local Review Criteria. For this statement, call out each of the relevant criteria and specifically address how it is being met in the proposed scope of work. Copies of the criteria are available online or from staff.</p>	<p>1 hard copy</p> <p>1 digital copy</p>	
<p><input type="checkbox"/> Drawings:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Site Plan (showing proposed buildings, paved areas, plantings, signs, and lights as applicable) <input type="checkbox"/> Exterior Elevations (as applicable) <p>Drawing Format:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Drawings must be to scale, with dimensions clearly indicated for all proposed work, and legible at the formatted size. <input type="checkbox"/> All existing and proposed building and site materials must be labeled. <input type="checkbox"/> All sheets in the submittal must be either Letter (8.5x11) or Ledger (11x17) sized. <p>NOTE: Staff reserves the right to reject drawing materials that lack sufficient detail to show the details of the proposed scope of work.</p>	<p>1 hard copy</p> <p>1 digital copy</p>	
<p><input type="checkbox"/> Photographs:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Photographs showing all sides of the structure. <input type="checkbox"/> Close-up photographs of areas of proposed changes. <input type="checkbox"/> Photographs of the adjacent structures (for outbuildings, fences, walls, etc.). <p>Photograph Format:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Photographs must be at least 300 dpi and at least 3½ by 5 inches, and formatted with appropriate labels in Word or PDF. 	<p>1 digital copy</p>	
<p><input type="checkbox"/> Previous Application Information: If this application is for an amendment to a COA or for a property for which a previous application was denied, attach a description of the changes in the plans for this application and include the previous case number in the Property Information section on the reverse.</p>	<p>1 hard copy</p> <p>1 digital copy</p>	
<p>Make checks payable to the City of Durham.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Application Fee for Minor COA: <input type="checkbox"/> Application Fee for Retroactive Minor COA: <input type="checkbox"/> Application Fee for dual application: 	<p>\$78</p> <p>\$156</p> <p>\$296.40</p>

Submittal Instructions

<p>Deadline: Minor COA applications may be submitted any day during regular business hours and are reviewed on a rolling basis.</p>	<p>Submit To: Karla Rosenberg Durham City-County Planning Department 101 City Hall Plaza, Durham, NC 27701</p>
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Attachment E: Massachusetts Regional Planning Authorities

Massachusetts RPA	Membership Format
Berkshire Regional Planning Commission	<ul style="list-style-type: none"> • 32 member communities • Commission consists of one member of the Planning Board of each member city and town, known as the Delegate, elected annually by said Planning Board and certified in writing • Each city and town, acting through its Chief Executive official, may also appoint an Alternate
Cape Code Commission RPA	<ul style="list-style-type: none"> • 15 member communities • 19-member Commission: <ul style="list-style-type: none"> ○ 15 are from the member communities appointed Board of Selectmen ○ One County Commissioner from Barnstable County ○ One Native American appointed by the Board of County Commissioners ○ One minority appointed by the Board of County Commissioners ○ One minority appointed by the Governor
Central Massachusetts Regional Planning Association	<ul style="list-style-type: none"> • 40 member communities • CMRPC Delegates and Alternates: <ul style="list-style-type: none"> ○ Those with fewer than 8,000 have one (1) delegate; 8,000 to 14,999 have two (2) delegates; 15,000 to 49,999 have three (3) delegates; and those with more than 50,000 have four (4) delegates. In addition, each community has an alternate who may vote in place of an absent delegate. The Commission delegates meet quarterly with an annual meeting in June. This body is responsible for all policy decisions including approval of the annual work program and budget. CMRPC's Executive Committee, composed of six (6) officers and six (6) delegates representing each of the planning subregions, meets monthly to oversee all financial, contractual, and personnel matters.
Franklin Regional Council of Governments	<ul style="list-style-type: none"> • 26 member communities • Council consists of the chair or designee of the Select Board of each town in Franklin County, a member of the Planning Board in each town, and up to 18 "Members at Large" elected by the Franklin Regional Planning Board
Martha's Vineyard Commission	<ul style="list-style-type: none"> • Seven member communities • Commission is made up of 21 Commissioners elected by Vineyarders or appointed by elected

Massachusetts RPA	Membership Format
	<p>officials, of whom 17 are eligible to vote on regulatory matters.</p> <ul style="list-style-type: none"> ○ Nine are elected by Vineyard voters in Island-wide elections held every two years ○ Six are appointed on an annual basis by the Boards of Selectmen of the Towns on Martha's Vineyard ○ One is appointed on an annual basis by the Dukes County Commission ○ Five are appointed by the Governor or member of the cabinet, four of whom do not vote on DRIs or DCPCs
Merrimac Valley Regional Planning Commission	<ul style="list-style-type: none"> ● 15 member communities ● Commission is made up of representatives from each municipality – one member appointed by the planning board, an alternate appointed by town officials
Metropolitan Area Planning Council	<ul style="list-style-type: none"> ● 101 member communities ● MAPC is governed by representatives from each city and town in the region, as well as gubernatorial appointees and designees of major public agencies
Montachusett Regional Planning Commission	<ul style="list-style-type: none"> ● 22 member communities ● MRPC is composed of members and alternates from its 22 member communities and a member from Devens ● Members are appointed by Planning Boards and alternates by the Mayors or Boards of Selectmen
Nantucket Planning & Economic Development Commission	<ul style="list-style-type: none"> ● One member community ● NPEDC includes 12 members: the Planning Board (5); a representative from the Nantucket Housing Authority; the Superintendent of the Department of Public Works; a representative of the County Commissioners of Nantucket County; a representative of the Conservation Commission; and three persons from the Town appointed at large by the Commission (with staggered terms) ● Staff members include the Director of Planning, Deputy Director of Planning, Transportation Planner
Northern Middlesex Council of Governments	<ul style="list-style-type: none"> ● Nine member communities ● Each community is represented on the Council by a chief elected official (Selectman or City Councilor) and a Planning Board member, and each community also has the option of appointing one alternate
Old Colony Planning Council	<ul style="list-style-type: none"> ● 17 member communities ● Council consists of one representative from each city and town of the Old Colony Planning District

Massachusetts RPA	Membership Format
	appointed by the Mayor or, in the case of a town, by concurrent vote of the Board of Selectmen and the Planning Board
Pioneer Valley Planning Commission	<ul style="list-style-type: none"> • 43 member communities • PVPC is composed of representatives from each of its 43 member communities • Each community is represented by two delegates: a Commissioner, generally a member of the municipal Planning Board, and an alternate Commissioner appointed by the city or town's chief elected official
Southeastern Regional Planning and Economic Development District	<ul style="list-style-type: none"> • 27 member communities • The Commission includes the chief elected officials (Mayors and Boards of Selectmen) in SRPEDD's 27 cities and towns (or their appointee); the region's 27 Planning Boards (or their appointee); and up to six at-large slots representative of low income and minority group interests