



## Ventura County Coalition of Labor, Agriculture and Business

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March 27, 2012

Ventura County Board of Supervisors  
Attn: Clerk of the Board of Supervisors  
Hall of Administration, 4th Floor  
800 S. Victoria Avenue, L#1920  
Ventura, CA 93009

**RE: Comments to the Board of Supervisors  
Board Agenda Item #32, Direction to RMA on Permit Processing**

Ventura County COLAB is submitting the following comments with respect to a recommendation by Supervisor Bennett to direct the Resource Management Agency Director on changes to improve permit processing and implement a One-Time Late Fee Amnesty:

In general we believe the permit processing system at the County of Ventura continues to be indescribably costly, time consuming and frustrating and could be improved by input from applicant stakeholders in a public forum environment. While the "Get to Excellence" program was conceived with good intentions, and began with stakeholder input, it has failed to make the process more transparent and understandable to applicants. The public has not had an opportunity to provide input on policies that have been implemented under the program. While the agencies have been holding informative meetings, they have not engaged the public on the issues of permit costs and timeframes. In fact, this letter from Supervisor Bennett reflects top down management style, without input from stakeholders. We believe that real streamlining of the permit process system is essential to the economic success of Ventura County, allowing businesses to expand and provide jobs to lower the current 9.6% unemployment rate.

The following are comments specific to the recommendations:

- 1) Authorization of a one-time amnesty period to waive a "portion" of late fees in longstanding enforcement cases is the tip of the iceberg of an aggressive code enforcement system that needs a complete overhaul.
- 2) The Development Review Committee (DRC) is an optional \$2,000 meeting with representatives of county agencies to discuss an applicant's project before submittal. This option has not been successful because applicants know there is no guarantee that the agency representatives will be decision makers. In addition, their advice and recommendations are non-binding and therefore have little value. Many applicants believe the purpose of the process is to discourage them from submitting a project. Forcing applicants to pay for a process they do not believe in will only cause more distrust of the system while increasing the permit cost by \$2,000. VC COLAB recommends that the Board reject any requirement by applicants for a DRC review.

3) The processing of wireless facilities is undoubtedly costly and difficult, subject to cumbersome and antiquated processes. These facilities are important to the quality of life in the community and our ability to compete for high-end companies considering relocation here. It is imperative that we support the wireless industry while balancing the rights of property owners and communities. This can be achieved by forming a Technical Advisory Committee of stakeholders to work with the agencies if they are directed to change the regulatory codes.

4) The concept of preparing a "Billing Fact Sheet" to inform applicants of the "billing process" assumes that applicants are somehow misinformed about their bills. In truth, the current unlimited charging allowed under the "Fee Reimbursement Agreement" system is unfair to applicants and contains no due process to discuss disputed charges. VC COLAB recommends a public forum to address the entire charging system.

5) The Initial Study Assessment Guidelines were updated by a lengthy, multiple agency, taxpayer funded review process ending in 2011. The increase in the length and cost of "Initial Studies" are a direct reflection of the lengthy documents generated by this process. Initial Studies will always be a time consuming and costly part of a discretionary permit. VC COLAB recommends that any changes to this process be discussed in an open forum with stakeholder input prior to committing county funding.

In conclusion, VC COLAB recommends that the subject letter be the start of a discussion to significantly improve the permit process which is stifling the growth of business and improvement of properties in this county. We look forward to participating in an open forum process where the county agencies are encouraged by the Board of Supervisors to work with the applicant stakeholders to improve all aspects of the permit processing system.

Thank you for the opportunity to comment,

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Gray Jensen". The signature is written in a cursive, flowing style.

Lynn Gray Jensen  
Executive Director