



November 13, 2023

Mayor Melanie Kebler
Bend City Councilors
Delivery via E-mail

Mayor Kebler and Councilors,

On behalf of the Bend Chamber's 1,150 members and 8,500 businesses in Central Oregon, we appreciate the opportunity to offer comments regarding the Community and Economic Development Department's permitting fee update.

Over the past year the Chamber has invested significant time and resources to research, convene, collaborate and advocate to help alleviate our current housing crisis. We have been at the table for discussions with City staff, builders, and finance professionals taking a deep dive into the permit fee process and methodology over the past several months.

While we understand the need to increase fees to pay for the staff who provide permits while keeping the city's reserves healthy, we still believe there are efficiencies to be achieved in the application process. We strongly believe that this improvement will be essential to general support from the development community regarding the increased permitting costs outlined by CEDD staff. As such we offer the following comments as opportunities for improvement based on feedback from Chamber members and partners in the development community.

1. Pre-application Process – clearly articulated metrics and milestones for a complete application
 - a. The process to prepare for permit submission is challenging to navigate, even for those skilled in working with the City systems. We appreciate the pre-application checklists and online access to the myriad of forms required for the permit process, yet we still hear confusion and concerns from the development community. During pre-application meetings we understand that written comments from planning are provided, but written comments from engineering are not. This can create communication challenges as the development project changes hands.
 - b. We request that city staff streamline the integration of all agencies and organizations that are relevant to the subject property (fire department; irrigation district; etc.) and provide written site-specific comments on the development proposed. After receiving as much detailed information as possible from the city and from other relevant agencies, developers can prepare far more complete and responsive plans for submittal, which will decrease staff review time and the need for revisions and re-submittal.

2. Cross functional communication to eliminate duplication and delay

- a. Understanding there are numerous inputs from different parts of City government to the building and planning departments, we observe opportunities to streamline communications processes. We've heard concerns with inconsistencies of review standards and subjective decision making applied to the review process. *"The ball is always moving with the City. We received a request to make changes from one staff member, and then more changes from another staff member. We'd like objectivity applied to change requests rather than what we observe as a subjective process."*
- b. Additionally, cross-function communication between departments has room for improvement and additional coordination. *"Engineering did not coordinate with the Fire Department on a recent project but rather made assumptions regarding the Fire Department's position. This lack of communication resulted in the need to overhaul and redesign the site a year into the project, causing delays and additional costs."*
- c. We request that clear lines of communication be documented, both with inter-departmental teams and cross-functional teams. This would provide a better level of understanding and clarify expectations for the review process.

3. Customer service-oriented partnership

- a. Public service is both a rewarding and challenging career, and we genuinely appreciate the dedication of City employees to make Bend an amazing place to live, work and play. Overall engagement with City staff is positive and collaborative. Yet we hear an undertone of concern regarding the permitting and development process, specifically concerns that inhibit development. *"It feels like the City is not a true partner and advocate for development, instead they are looking for ways to catch mistakes and be punitive."* Ensuring accuracy and safety is paramount, however a collaborative approach is certainly more effective.

4. Comprehensive and accurate timekeeping for permit application and processing metrics

- a. Recent accomplishments and improvements to the permitting process time are laudable, and we appreciate the focus of City staff on the improvements. Time is money, and every day, week and month that passes in the pre-development process not only eats away at finances, but also exacerbates our housing crisis. While the City has made improvements to permit turnaround times, we disagree with the methodology used to calculate those timelines. *"The most cumbersome part of the permitting process is what happens before application completion. This is where we get delayed and incur unplanned costs."*
- b. The City's permit tracking system begins counting days for processing after determination of building permit application completion, including all necessary elements. This frequently does not occur until many weeks after the initial permit application submittal.

We have heard from many builders and businesses that the pathway to completion is difficult. It often includes many phone or email conversations between the permit reviewer and the customer with frequent delays in communication. From the customer's perspective, their investment and debt begins in the first days of initial submittal. This time is very impactful but is not included in the metrics that are maintained by city staff. In order to ensure that building permits are processed most expediently, we request that the city adopt a policy that ensures prompt replies and processing.

Thank you for the opportunity to outline ongoing concerns and opportunities for improvement. The Chamber does not speak for individual businesses or developers with these concerns, but rather as a collection of anecdotes and experiences. We share them in the spirit of collaboration and observations from outside the day-to-day process and urge the City to view the comments as such.

As always, we appreciate the ongoing partnership with City leadership and staff and stand ready to continue these conversations.

Regards,

A handwritten signature in black ink, appearing to read "Katy Brooks". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Katy Brooks
President & CEO
Bend Chamber of Commerce