Skamania County Development Review Process
Performance Audit
Final Report

Summary

The Latimore Company, a consulting firm dedicated to evaluation and improvement of local government development permit operations, conducted a performance audit of the Skamania County development review process over the winter of 2009-10. The objective was to gauge performance and recommend steps County departments could take to improve the predictability, efficiency and collaboration of development reviews. These reviews are currently regulated by the Community Development and Public Works departments with supporting roles from the Assessor and Auditor’s departments, various state agencies, and the Columbia River Gorge Commission.

This assessment identified strengths that include the outstanding “Guidelines for Dwellings” handout.

Seventeen improvement recommendations are offered to improve the process, led by changes to the intake and revision process, providing a process and tool for early identification and resolution of onsite critical areas, and adoption of an onsite septic system ordinance and policies.

Many applicants are upset with a process that is prone to iteration, particularly the community of onsite septic system designers. These improvements address the root cause of this revision and create a process that is predictable, efficient and collaborative to ease the approval process for applicants that face an elevated number of critical areas than most regions of the State experience with the Columbia Gorge and other extraordinary ecology.

The next step is implementation of these recommendations, most of which are achievable this year. The Latimore Company offers to assist with and accelerate this implementation.
Background

In October 2009 the Skamania County Board of County Commissioners in partnership with the Community Development and Public Works directors contracted with The Latimore Company, LLC to conduct a performance audit of the County development permitting process.

Sought were recommendations that would offer greater predictability, efficiency and collaboration in the County development review process, foster economic development, and improve customer service.

The Latimore Company:

- Examined how the process is organized and how applications circulate.
- Analyzed performance of indicative application types.
- Interviewed numerous applicants by survey, focus groups, and individual meetings.
- Interviewed all staff members.
- Identified strengths.
- Identified improvement opportunities.
Offered prioritized recommendations for improvement.
Worked with the team to draft clarifying policies and an onsite septic code.

The Latimore Company is a Washington State consulting firm that is dedicated to improving the predictability, efficiency and collaboration of community permitting. The firm has consulted for over 20 Washington counties and cities to audit and improve permit process performance.

**Influences on the Process**

The needs of the development review process are similar in many ways across the State. The public needs a safe built environment that adapts effectively to the personal and commercial objectives of our citizens while remaining ecologically sustainable. We use development review as the regulatory vehicle to check that development plans and the resulting field construction in the unincorporated County is safe, that land uses are compatible, that the public using these facilities has healthy water and sewage disposal, traditional access in and out, that environmental systems like surface water and habitat are maintained, and that hazards such as landslides are respected.

The complexity of achieving these objectives varies from community to community, however. Skamania County, like each local area, has its unique blend of environmental conditions, geography, population centers, community goals, and proximity to urban centers that exercise aspects of its permit processes in different proportions. Here that includes exceptional features such as the Columbia River Gorge National Scenic Area and the Gorge itself.

These influences necessitate different processing methods to deliver predictability, efficiency and collaboration in each community. The following are key influences here in Skamania County.

**Environmental Factors**

The three predominant environmental features in the area begin with the Columbia River and its associated Columbia Gorge. The second is the Gifford-Pinchot National Forest that occupies the vast majority of the County lands. The third is the Mt. St. Helens volcano. The net effect of the complex geological constructs, steep slopes and landslides, bounding river to the south, volcanic hazards to the west, and the forest with its logging industry to the north largely concentrated local population centers along the river in the south. Housing sites generally require careful consideration of these environmental factors. Geotechnical engineers, habitat biologists, and other experts are often involved in the siting of these structures. This means more sophisticated project management and more expert findings to integrate into the design than most State applicants have to do.

Further, Skamania County is both Western and Eastern Washington. The Gorge connects the regions, enabling state highway SR14, and bringing with it unusually intense wind and snowfall
as well as six watershed resource inventory areas (WRIAs). These conditions require heavier
duty construction in exposed areas, compress the seasonal construction window, and magnify
PW snow removal operations which led to a decision years ago to stop acquiring new public
roadways in favor of private drives. It’s also produced regulatory gaps: unlike most jurisdictions
in the State, there are no adopted stormwater or traffic ordinances here. Thus, the State
Environmental Policy Act (SEPA) is triggered on more types of projects here, lessening
predictability and efficiency. Radon gas is also a concern, requiring structural venting as a
precaution.

However, generally good soil properties allow the use of conventional onsite septic systems on
the majority of the lot sizes and shapes found here, and water from onsite wells is generally
adequate. Smaller parcels and narrow lakefront lots, as elsewhere, often require alternative
septic systems and careful well placement or shared “Group B” wells to maintain adequate
drainfield separations.

**Proximity factors**

There are two main proximity factors that influence the permit process here. First is
the adjacent State border with Oregon and the nearby Portland/Vancouver
metropolitan center. The Bridge of the Gods, SR14, I-84, I-205 and I-5 create
ready access for commuters and numerous regional shopping choices. The Skamania
County Economic Development Council (EDC) reports that over half of local
residents commute to the metro area. Combined with tax law differences, much
of the local shopping occurs elsewhere too. There are relatively few commercial
permits issued in Skamania County,

though the sizable Port District and the EDC pursue active recruitment campaigns. A good
number of our local permit applications are submitted from outside the area for second or
retirement properties.

The second and related proximity factor is that many of the experts that participate in the design
and siting of structures here are located throughout the broader region. Some travel a good
distance to evaluate sites, and to submit and pick up plans at the Permit Center.

**Federal Presence**

Nowhere in the twenty jurisdictions that The Latimore Company has audited processes is the
Federal presence more pronounced. The Columbia River Gorge National Scenic Area (NSA)
land use policies, combined with exceptional interest group scrutiny of application decisions create a whole new layer of permitting process sandwiched inside the normal permit process for applications within the Management Areas. A third of the County planners are dedicated to processing permits in the NSA.

Further, the combination of Urban Area, General and Special Management Areas create a mosaic in the NSA that operates very similar to Urban Growth Areas in counties planning under the State Growth Management Act (GMA). GMA counties work closely with their cities to plan out how the county UGAs transition one permit at a time into urban environments with sewer systems, curbs and sidewalks. The parallel here suggests a similar level of effort is needed. The City of Stevenson is currently in the process of updating their comprehensive plan.

Federal effects include the power projects on the Columbia, forcing at one time the complete relocation of the City of North Bonneville for a second power house. And many of the longtime residents interviewed during this audit spoke of the effects of the Spotted Owl logging moratorium and its life-changing impacts followed by the now-waning Secure Rural Schools and Self Determination Act grant programs. Resentment runs deep for many interviewed in the audit, and likely affects their view of local department efforts to enforce the development codes.

The area is a Federal HUB zone, however, which qualifies many local firms for set-asides in Federal government purchasing. This creates a special economic development opportunity here.

**Recession and Financial System Shock**

As elsewhere in the United States, the shock to the financial system and resulting recession has resulted in permit declines of 50-75% from the peaks of 2005-2007. Skamania County volume has declined by half in lock-step with the regional trend (Fig. 1). However, residential construction is highly volatile. Most Washington jurisdictions now report that recent declines have stabilized. If past trends repeat, the regional market is on the edge of a recovery that as in years past will strain local departments to keep pace with demand.
Local Regulations and Practices

Five local regulations and practices round out the key influences on the County permit process. These include new zoning regulations, stream crossings, well sampling and soils evaluations, and recent fee increases.

First, Skamania County, which does not plan under GMA, is in the process of implementing zoning in many areas for the first time. This new zoning is the subject of an appeal that is still pending resolution. Some of these lightly developed and forested areas of the County are now the subject of development projects. This adds uncertainty to the process.

Second, Skamania County decides permit applications in developed and rural areas. The County’s two incorporated cities, Stevenson and North Bonneville decide local land use and construction permits within their jurisdictions, but the County team decides similar applications in Carson, Underwood, and handful of other locations, as well as all of the EH applications throughout the County.

Third, the current critical areas ordinance (CAO) requires that all stream buffer encroachments (e.g. buffer averaging) of greater than 50% of the prescriptive standard receive a public hearing and decision of the hearing examiner. This is fairly common practice in the State. However,
most exempt stream crossings from this category and decide them administratively in conjunction with the WA Dept of Fish & Wildlife (WDFW). Every new stream crossing in Skamania County requires a hearing.

Fourth, well water sampling and onsite septic soils evaluations are conducted exclusively by County sanitarians here. Most jurisdictions allow landowners to collect water samples and allow, if not expect, septic system designers to evaluate the soil properties.

Lastly, the County made significant changes to the fee schedule during the course of the audit, raising most fees and provisioning the schedule for when new services debut.

**Organizational Design and Responsibilities**

The development review process is primarily executed by two County departments (Fig. 2), Community Development (CD) and Public Works (PW). The Auditor and Assessor offices participate in most land use actions as well, with the Auditor providing and recording documents and the Assessor managing lots of record, parcel numbers, and official maps including the County Geographic Information Systems (GIS) that CD uses for initial critical area checks.

The CD department develops draft regulations and implements the planning and environmental health codes. Planning oversight includes land use actions, the comprehensive plan and zoning, environmental review (e.g. critical areas, shorelines and SEPA), public notice and hearings, interagency coordination, appeals, and related tasks. Planning personnel are dedicated to NSA or non-NSA project review, major projects, or long range planning. The director is cross-training staff to expand skill sets and assignment options. One of the two NSA area planners was out on leave during the audit. She generously participated by phone.
Environmental Health (EH) oversight of the built environment includes drinking water, sewage disposal, food establishments, solid waste programs, and related tasks. The two sanitarians manage their tasks jointly as a team. For the first year of the program, all onsite septic system design reviews were handled by one of the two personnel while the other, who joined the team from Oregon, established his Washington certifications. In the fall of 2008, the EH program was recalled back from the Southwest Washington Health District (aka Clark County) to provide greater local oversight and better customer service. It has taken a year to organize the transferred septic records. There is not yet a local ordinance governing the onsite septic program; it currently draws its authority directly from State Law (the RCW and WAC).

The PW department develops draft standards, implements the engineering and development standards, and maintains the County infrastructure (e.g. roads and facilities). The PW department includes the County Engineer, 25% of whose time is dedicated to development review (principally land use actions), and the Building & Fire Official and Permit Technician who oversee building and related construction permits and inspections.

The team and some of the public interviewed noted that there has been significant turnaround in staff personnel in years past. This trend appears to have stabilized and most have been in their current posts for at least two years. The building and fire personnel have decades of experience here in their roles as does the senior planner.

One of the questions to be answered by the audit is whether the building and fire function should be migrated to CD from PW. The current organizational structure requires nearly all development applications to cross the boundary between the two departments at least twice. Most local governments in Washington place the building and fire functions with the planning functions.

**Current Process**

**Construction Permits**

The review process that Skamania County uses to decide most development applications is shown in Figures 3-5.

In these figures, the red, crosshatched County tasks comprise the critical path that governs the pace of the permit process. The blue, shaded County tasks are generally completed during the time other, longer tasks are in work and thus are not on the critical path. The green, starred tasks are applicant activities that are paced by contractors or the applicants themselves.

Note that these timelines are typical but were often longer if the review process revealed a need for additional applicant analysis or reconciliation of inconsistencies in the applicant’s various submittals. Some project timelines were shorter too, when design revisions weren’t necessary.
As Fig. 3 indicates, when a new or expanded onsite septic system is required, its approval sets the pace and forms the critical path of project approval. The process is designed to withhold issuance of the building permit until potable water availability and an approved onsite septic system design is demonstrated. However, the building permit may be submitted, reviewed and readied for issuance in the meantime, so it can be ready once the other approvals are obtained.

The approval process for structures that are using existing water and septic systems is paced by the planning and environmental health checks for zoning, setbacks, critical areas, and suitability of the existing water and septic systems for the scope of construction (Fig. 4). The internal performance target for completion of the planning review is 3 days. This planning review generally uncovers a need for additional information from the applicant which adds a few weeks to the timeline on average.
Projects within the NSA must first receive a land use approval. The approval process (Fig. 5) begins with a 20-day natural resources review based on County maps and standards. If this review indicates the applicant has provided appropriate information for the project and environmental factors that apply to it, a completeness letter is issued and the package is forwarded to various State habitat and cultural agencies and the Columbia Gorge Commission staff for a 20-day comment period. Based on agency responses, additional information or revisions may be requested. Otherwise, public and tribal notices are published and comments received over a 30 day period. After notice periods close, a staff report is generated and an administrative decision is rendered. This may be appealed to the County hearing examiner. The hearing examiner decision may be appealed to the Gorge Commission.

**Figure 5 - Typical Review Process within the National Scenic Area**
**Land Use Actions**

Most project land use actions begin with a counter inquiry. About half of all land use applicants elect to hold a pre-application meeting prior to submittal. During a “pre-app” meeting the staff provides the applicant feedback on their preliminary design and guidance for the upcoming processing steps.

Due to the absence of a local stormwater and traffic ordinance, most land use actions require SEPA determinations to determine and attach these requirements to project actions. Thus, a SEPA checklist accompanies most land use applications.

Upon submittal, SEPA is processed first. This includes agency and public comment followed by selection of measures that mitigate project impacts, and issuance of the SEPA determination, appealable in Superior Court. After the SEPA determination, land use application review resumes with public notice and administrative decision or a hearing before the hearing examiner. A buildable lands analysis may be required to show how the new lots will support their intended purpose with the required improvements.

**Variances**

Projects that encounter critical areas that cannot satisfy prescriptive buffers (minimum setbacks to construction areas) require a variance. A need for a variance may be clear from the onset and applied for at the time of the construction application. More commonly, a need for variance is established during construction application review. Staff is authorized to develop custom site mitigation measures to modify prescriptive buffers by up to 50%. A ruling by the hearing examiner is required beyond that.

As indicated previously, all stream crossings, which amount to 100% buffer encroachments, require a public hearing with the examiner. Recommendation #13 is to empower staff to decide stream crossing variances administratively. Standards for the program would be developed in partnership with Fish & Wildlife to be compatible with hydraulic project approval (HPA) practices.

**Current Performance**

Several key indicators were used to gauge the performance of the Skamania County development review process. They measure decision time, application volume and quality. An indication of morale was also obtained through the applicant feedback as noted in the strengths and improvements chapters of this report.

Time, volume and quality measurements are based on a detailed, case by case examination, providing a very rigorous analysis. A small number of cases, on order of 5%, were excluded from analysis because case files and tracking system data were inadequate to reliably measure
these County/applicant exchanges. Data was collected back to 2007 to gauge trends and gauge performance during higher activity periods. 2009 data is as of November 30.

Time was measured from the date of application to the date of approval. The timeline for each case was then broken down further to differentiate the number of calendar days the County held the application in process vs. the number of days the applicant took to revise his or her application to incorporate corrections. This allows observation of the timelines when no revision is required vs. those when rework and extra review cycles occur.

Volume from year to year is gauged by the number of cases decided in that period. This allows us to compare timeline sensitivity to application volume.

Quality was measured by the number of revisions each application needed in order to reach an approval from the County. While some iteration occurs to correct a design’s failure to meet one or more of the various development codes, pattern iteration is primarily a function of the application “completeness” standards and the screening process used to verify these materials are present at the time of submittal, and the controls in place to execute a complete plan review each time.

Sixteen key timeline indicators were collected. These include volume counts and breakdowns of the timelines into County review and applicant revision portions when available in the case files. These indicators included:

1. New single-family building permit approval time and comparisons.
2. NSA approval time.
3. Onsite septic system design approval time.
4. Onsite septic soils evaluation time to produce a results letter.
5. Short plat approval time from submittal to the date the applicant is notified that the plan meets requirements and construction of required improvements may begin.
6. Preliminary plat approval time from submittal to the hearing examiner decision.

This data is presented in Figures 6-19.

New SFR and onsite soils evaluation approvals declined over the three-year period, while onsite septic design approvals remained relatively constant. Meanwhile, NSA approvals spiked in 2008, returning to the 2007 level in 2009.

NSA approval timelines stretched roughly in proportion to the volume change over the period, while soil evaluation timelines remained fairly constant. Onsite septic design approval timelines nearly tripled in 2008 as applicant correction timelines and iterations soared. 2009 septic design reviews and applicant corrections are faster despite continued iteration rates. SFR building permit issuance timelines grew from 2½ months in 2007-08 to 3½ in 2009, though when excluding the time between approval and issuance, approval timelines remained a fairly constant 4-6 weeks except for those requiring NSA approval.
Short plat timelines and iteration averages rose in 2008 in proportion to an increasing incidence of revisions. Data obtained on the construction phase of these projects indicates an unusually large number of correction cycles, on order of 10-15 cycles with an extraordinary 31 iterations in one case. SEPA is triggered in all short plats to regulate stormwater.

The three full subdivision cases approved over the period took 7 to 14 months to approve. The two projects where iteration data was available averaged 11 review cycles. Like short plats, this is a large number of corrections. Two to three corrections prior to preliminary approval is the regional norm.

Regionally:
- Skamania County timelines for New SFR permits are typical of similar counties for homes outside of the NSA. The scenic area adds a month to the average.
- Skamania County timelines for short plat approval are typical although twice as many revisions are needed on average to obtain approval to begin site improvements.
- Skamania County timelines for preliminary subdivision approval average 2-3 months longer with triple the revisions of projects in similar counties.
- Skamania County onsite septic system design approvals average a month longer than similar counties.

![Building Permit Decision Times (2004-09) - New SFR](image)

Figure 6 - New SFR Permit Approval Timeline Comparisons
Figure 7 - New SFR Permit Approval Timelines (NSA vs. Outside NSA)

Residential Building Permit Volume (2005-2009)
Skamania County

Figure 8 - New Residential Building Permits by Year

All Other Residential Permits
New Residences

Predictability • Efficiency • Collaboration
Figure 9 - NSA Land Use Approval Timeline Averages

Skamania County NSA Decision Timelines

Figure 10 - NSA Land Use Decision Timelines (Skamania County)
Regional Short Plat Decision Cycle Times (2001-2009)
Preliminary Subdivision Approval
(Total Elapsed Working Days from Submittal to Decision)

Figure 11 - Regional Short Plat Approval Timeline Comparisons
Figure 12 - Short Plat Approval Timelines (Excludes Improvement Phase)

Figure 13 - Short Plat Timelines (Intake to Final Recording)
Figure 14 - Preliminary Subdivision Approval Timelines (Individual Projects)

Long Plat Decision Cycle Times (2001-2007)

Preliminary Subdivision Approval
(Total Elapsed Working Days from Submittal to Decision)

Figure 15 - Regional Preliminary Subdivision Approval Timeline Comparisons
Skamania County Onsite Septic Approval Timelines

![Timeline Graph](image)

**Figure 16 - Onsite Septic Approval Timeline Averages**

Skamania County Onsite Septic System Design Approval (D Cases)

![Design Approval Graph](image)

**Figure 17 - Onsite Septic System Design Approval Timelines**

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Predictability • Efficiency • Collaboration
Onsite Septic Permit Turnaround Times (2004-09)

Figure 18 - Regional Onsite Septic Design Approval Timeline Comparisons

Skamania County Onsite Septic System Soil Evaluations (S Cases)

Figure 19 - Onsite Septic System Soil Evaluations (Results Letters)
**Strengths**

**Applicant Compliments**

We begin with strengths that applicants noted during interviews. Foremost was universal praise of the Public Works department Building team for outstanding service and assistance. An applicant survey echoed this sentiment on a wide array of service aspects (Fig. 20). Many went on to add in that they did not want to see the Building team merged into the Community Development department, fearing this superb performance would be lost. More on this in the next section.

![Figure 20 - Applicant Survey Responses](image)

One NSA applicant gave a glowing assessment of the service he received working with the departments on his new home project. From start to finish, he said, his planner explained the process and walked with him though it, step by step. Surprises were few and a little study on his part of the County materials earned him the “A+” result he was looking for.
Additional Strengths

There are two other particular strengths in the current program.

The first is a Design Guidelines handbook (Fig. 21) that the County produced to guide applicants through the design of a safe home in Skamania County. It focuses on the unique aspects of home design here, such as snow and wind loads, and contains code excerpts and explanations for common design details such as roof design. This well prepared package is regularly provided to prospective applicants at the counter. Well done.

![Guidelines for Dwellings Excerpts](image)

**Figure 21 – “Guidelines for Dwellings” Excerpts**

The second strength of the current program, in the view of the Gorge Commission director’s office, is Skamania County’s implementation of the NSA management plan. The office gave highest marks to Skamania County for compliance monitoring and inspection, responsiveness to input and suggestions, and standing the test of intensive public scrutiny. Most of the buildable NSA land and NSA applications are in Skamania County.
Improvement Areas

Applicant Complaints

Nearly all applicants expressed dissatisfaction with the CD process. Many applicants are furious and/or baffled with a process that appears to be a moving target, letter after letter, where durable answers are hard to come by. A panel of onsite septic system designers and installers add that they have no say in the program that governs their profession here in Skamania County. The essence of this sentiment is captured in Figures 22-23.

![Public Feedback](image)

- Nearly all who offered feedback are furious and/or baffled with the CD process
  - Moving target, letter after letter
  - Most don’t understand the whole process or timelines
  - Can’t get an answer/access at the counter
  - Can’t get answers when your reviewer isn’t in
  - Answers change (person to person, time to time)
  - See a gulf between the two departments
  - Many nice people though
- Elevating problems to leaders works
- Almost everyone is delighted with Bldg/PW
  - Frequent refrain: “Don’t move Building team into CD”
- Many would like up-front onsite collaboration
- Electronic submittal suggested by several

Figure 22 - Typical Applicant Feedback
As indicated previously, several were fearful that migration of the Building team from PW into CD, as is the model in many jurisdictions, would diminish the strength of this aspect of the current program. Building on sentiment from the extraordinary federal presence in the County, the environmental and zoning regulations administered by CD are seen by many as more restrictive government regulation making CD a “no” department, while PW is a “yes” department. This has taken root in the departments too over time and needs resolution.

**Top 3 Improvement Opportunities**

The top three improvement areas for the Skamania County development review process are:

1. Eliminate excessive revisions.
2. Identify and resolve critical area requirements early in each project.
3. Adopt an onsite septic ordinance and implement situational policies.
Excessive revision is eliminated through a package of recommendations that:

- Establish submittal (intake) checklists that prescribe what staff needs to receive in each application to conduct a conclusive review.

- Screen incoming applications to ensure each contains the intake checklist items, rejecting those that do not.

- Create integrated revision letters, when revision is necessary, that include all reviewer comments, tested for reasonableness.

- Screen incoming revisions (resubmittals) to ensure each addresses all integrated revision letter items, rejecting those that do not.

- Create one final inspection punch list across the departments that specifies what remains for the applicant to complete/install before final approval is granted by the County.

- Adopt a stormwater ordinance to improve clarity for applicants over the standards and avoid repetitive triggering of SEPA for stormwater management purposes.

- Adopt a traffic ordinance to improve clarity for applicants over the standards and avoid repetitive triggering of SEPA for transportation connections.

Identification and Resolution of critical area and application requirements early in each project is achieved by:

- Expansion of the current site evaluation level 2 (SAL2) process to screen for and resolve these matters prior to submittal of construction applications. An evaluation would be required, including generation of supporting analyses like a wetland delineation or geotechnical assessment, prior to submittal of construction applications like building or septic permits unless the parcel report, described next, indicates a simpler process applies. The site plan vested under this process is used to streamline successive permit applications and reviews. The evaluation also explains what forms and permits are needed to complete the project.

- Creation of an online parcel report based on County GIS records and embedded logic that identifies mapped critical areas and buffers on a given County parcel, provides an indication of project complexity, and signals items that County staff would require a resolution of in order to approve a project. This helps prospective applicants evaluate what lies ahead, provides a framework for more effective early collaboration with the County, and creates a standard tool and vocabulary for all involved in the process.
Recommendations

TLC recommends the following 17 improvements. These are listed in priority order, with Recommendation #1 being the highest value improvement to the process. The first 8 recommendations are highest priority. Some are ready for implementation, others will take more time. Estimated timeframes are given for each.

1. **Real-time intake completeness screening based on checklists.** This improvement defines an intake checklist for each application type. Applicants use this checklist to determine when they are ready to submit. At submittal, the application is then screened to confirm checklist content is present. This step enables staff to achieve a conclusive review of the application. The departments have already mobilized on this recommendation and have completed an initial set of checklists. Thus, these may be made available to applicants right away. However, applicants will need some time to adjust to the new intake standard. So, these checklists should be incorporated into the application packets now yet compliance made mandatory on July 1, coinciding with the building code update. Compliance should be encouraged in the interim as it accelerates the applicant’s review.

2. **An integrated correction letter after full, parallel review.** This improvement combines all CD and PW department comments, if any, into a single correction letter. The applicant, then, uses this as a checklist for revising the design and knowing when they are ready to resubmit. This practice may be implemented immediately. However, until the enhanced site evaluation improvement in Recommendation #4 is implemented, an elevated likelihood exists that changes to accommodate critical areas may introduce new issues in other aspects of the design during second review, like a need to relocate a structure that could in turn require a revision to an onsite septic system design.

3. **Real-time revision completeness screening based on integrated correction letters.** This improvement screening coming revisions (resubmittals) to ensure that the applicant has addressed all of the required corrections so that the second review can be conclusive. These first three improvements work together to eliminate a system that appears to some to be a “moving target” that is more often a natural consequence of launching review with insufficient information for conclusive reviews. By reducing revisions, predictability is improved and staff capacity is freed for faster review and additional pre-application assistance. This practice may be phased in as integrated correction letters are implemented. The letter should be explicit about the need for all corrections to be addressed.

4. **Enhanced site evaluation process.** This improvement surfaces and resolves critical area requirements for a given project ahead of the rest of the review process. The applicant submits a preliminary layout of how they intend to develop. Staff uses its array of critical areas, zoning and comprehensive plan references, combined with site visits in many situations, to evaluate whether special approvals or analyses are required to demonstrate code compliance, and what the application forms and process would be for the project. If studies are required, the applicant completes and submits this work. With this...
information, the County approves the resulting site plan that envelopes the areas to be
developed and vests it for five years. The vesting period provides stability for the
applicant to finish the remaining design and permitting tasks.

5. **Parcel reports.** This improvement takes the County’s existing GIS content that the
departments use for site evaluation above, processes it with embedded buffer logic, and
creates a standard, one-page report that illustrates detected site evaluation features and
translates these into a simple list of yes or no answers (Fig. 24). These parcel reports
would be made available online so prospective applicants could run them anywhere,
anytime. Staff would run them as well to answer inquiries quickly and far more
accurately than time allows for today on the fly. Several applicants cited incorrect or
inadequate information was provided at the counter that resulted in delay and revision
later. Further, the logic of this report can be used to automatically identify parcels that
County data suggests are free of impactful critical areas. These could qualify for an over-
the-counter site evaluation review or pre-approval to proceed directly to construction
application submittal (Fig. 25). Also recommended is a list of minor project types that
are exempt from a prerequisite site evaluation. Interior reconstruction to repair fire or
storm damage might be an example.

The team has been working in partnership with the Assessor’s Office during the audit to
scope a timeframe for the County to bring this powerful technology online, and prepare
an initial batch of critical area maps for online posting while the parcel report logic is
developed. The team estimates these initial maps will be available online in 3-4 months.
Parcel report logic may take two years to develop given the competing needs of other
County departments for GIS technology enhancements.
Predictability • Efficiency • Collaboration
6. **An integrated punch list with coordinated responsibilities.** This improvement creates a single punch list when an applicant requests a final inspection if outstanding items or construction corrections remain. This replaces separate planning, health, building, and engineering lists as may apply. This provides an efficient mechanism for the applicant to organize completion of their project and communicates finish-line expectations of the County inspectors clearly. This also requires the departments to agree for common development scenarios which specialty determines when the applicant has satisfied their requirements, such as access roads, setbacks, stormwater facilities, water lines, turnarounds, etc. This improvement may be implemented quickly, limited only by interdepartmental agreement on roles and responsibilities and a decision on the format and timing of the correction notice to be used as the punch list.

7. **Environmental health policies and an onsite septic system ordinance.** This improvement, established at the outset of the audit by the County as a needed improvement, adopts a local ordinance that defines how State onsite sewerage system standards are applied in Skamania County. These are based on WAC 246-272 and related chapters. The recommended code language draft stays close to the WAC standards, with a few areas of amplification to clarify how certain provisions are applied here. It also adopts a required operating and maintenance (O&M) program for onsite septic systems and uses these inspection records as they become available to streamline permit applications on these sites. Related staff policy drafts for clarifying how the
County treats reuse of existing onsite water supplies and onsite septic systems, the filing of record drawings (as builts), and the collection of potable water samples for testing add predictability. Policies may be implemented near term, paced by introduction of these new policies to the local water and wastewater design and installation industry and staff reviewers.

8. **Uniform staff access to and rigorous real-time use of Black Bear© permit tracking system.** This improvement utilizes the existing Black Bear© (BB) permit tracking system in a more comprehensive effective and reliable way. Here, all staff members use the system to determine work to be done, who is assigned to what, the priority of tasks to be completed based on aging relative to turnaround time targets in Recommendation #9. Staff then enters their findings real-time as daily review unfolds, producing an accurate record of project documents and conclusions. Management gains far better information for timely management decisions too. Today, some reviewers use BB more than others, some lack basic access to the software from their workstations, and a half-dozen spreadsheets and 3-ring binders are needed to fill in gaps in the current BB records. These extra references can then be retired, sparing the recurring manual efforts needed to maintain them today. This improvement may be implemented near term by departmental agreement. Peer training on proper use and nomenclature of the system, and installation onto workstations not currently configured for BB, would likely add 3-4 months before the manual tools could be retired. These may be retired when their information consistently matches BB records.

9. **Publish turnaround time targets and use Black Bear to monitor performance.** This improvement publishes for applicants a list of turnaround time targets that the County team uses to set internal due dates to complete application reviews of various types. Applicants benefit by knowing more precisely when their review findings will be available, so their projects can be planned accordingly. Combined with the intake improvements of Recommendation #1 and the BB improvements in Recommendation #8, this improves predictability and detection of any languishing reviews.

10. **Post daily plan review status online.** This improvement posts the current review status of all in-work applications at the end of each day. This provides applicant new visibility of which department specialties have finished their review and which if any see a need for corrections. This allows applicants to gauge progress relative to the performance target in Recommendation #9 and get an early indication of what the reviewers will conclude. BB, particularly with features in a proposed upgrade may have built-in utilities to largely automate daily status refreshes. Even a posted Adobe Acrobat© pdf printout of canned case reports helps. This improvement also reduces manual staff effort to respond to applicant status inquiries. Note that applicants observing a seemingly unchanging status often construe this to mean there is a problem with their review. Therefore, status indications should be refined enough to present a sense of velocity to applicants.

11. **Noticing and hearings rigor with a clear applicant role.** This improvement enhances the structure around the public hearings process with the County hearings examiner. It is important that the required public and party-of-record noticing is fully executed by staff
with the required lead-time ahead of the hearing. Procedural error gives reason to remand the application back to staff for re-noticing, unnecessarily delaying applicants and repeating hearings. Also, it needs to be made clear to the applicant before the hearing that they are expected to speak to the merits of their development plan. Some applicants have been surprised to learn they have an active role in the hearing or that they even have to attend. This improvement may be implemented now with staff training and augmentation of the existing parcel-folder checklist to clarify the timing and content of noticing steps. A good recommendation from the hearing examiner is to include the County attorney in appeal hearing proceedings. Many times the appellant is represented by counsel yet the County isn’t and the examiner role is strictly as a judge. Further, she suggested a few hours of staff training on the legal process to better understand the process, giving testimony, and understanding attorney definitions.

12. Stormwater and traffic ordinances (in lieu of SEPA). This improvement adopts a stormwater manual (or watersheds of the County) and a traffic ordinance for the County. This allows staff to review and approve applicant stormwater and traffic plans without invoking SEPA, which simplifies the process and provides clearer standards for applicant design. This improvement will be paced by the PW department workload to develop this language and promotion through the adoption process. A good target would be winter 2010-2011 to be in place for the 2011 construction season.

13. Administrative stream crossing variances. This improvement empowers staff to decide stream crossing variances administratively, eliminating the current hearing requirement before the examiner. This aligns with common regional practice. This change is supported by the hearing examiner and Fish & Wildlife. Approval standards, harmonized with Fish & Wildlife HPA standards would continue to apply. Only the process would change. This provides an opportunity to improve coordination with Fish & Wildlife. The agency gave the County good marks for past coordination and recommends this be built on to work together more efficiently. Administrative stream crossing decisions improve efficiency by eliminating the hearing notices, preparation, and the proceedings themselves. Decisions would be appealable to the examiner. This improvement may be implemented this year if added to the current-year docket.

14. Move the Building team to the CD Department. This improvement reduces the number of organizational boundaries that applications pass through for project review and approval. Today, nearly all applications cross multiple times between CD and PW in the normal office workflow. While the team has become adept and managing these exchanges in most instances, it is logical to combine these specialties under single management for more efficient management. As the County Engineer’s role in project review is only 25% time, the engineer should remain in PW to keep his primary workflow under common management. This should result in little change to the customer experience in building review and inspection. Staff cross-training opportunities could be expanded as well.

15. Electronic submittal and approval pilot for onsite septic system designs. This improvement would provide an electronic submittal option to the septic system industry.
This reduces trips to the County offices and reduces the time spent transmitting documents. This would also serve as a pilot program to explore expanding electronic submittal options for other types of permits. Onsite septic is a good place to start as the industry and staff is already accustomed to coordinating septic applications while designers and their customers complete their respective tasks for a complete application. Electronic (e-mailed) submittals would be sent to the front desk for intake screening per Recommendation #1. Incomplete submittals would be e-mailed back for correction. Notification of a complete submittal with the assigned case number would be e-mailed back after successful intake. This may be implemented concurrent with Recommendation #1.

16. **Alternative onsite septic system installer certification program**. The team mobilized during the audit to establish an initial alternative septic system installer certification test. Since transfer of the program back to the County in 2008 there has been no test available to installers seeking to construct alternative systems here. Only those with active installer licenses under the SW District program at the time of transfer currently have credentials to install here. This is now available to the industry.

17. **Joint NSA Urban Area planning with Stevenson**. This improvement enhances collaboration between the County and the City of Stevenson for comprehensive planning of the NSA urban area surrounding the city. The benefit would be clearer standards for transformation of the rural areas surrounding the city that can develop under the NSA regulations into urban environments with curbs, gutters, sidewalks and urban utilities. Until annexed, the County decides all development applications in this area, setting the standards such as stormwater and transportation that will ultimately have to be melded into the Stevenson infrastructure. Standards could be established through this collaboration that increase the efficiency of annexation and promote best and highest use of the limited urban area specified under the NSA. This improvement would be worked in alignment with the Stevenson comprehensive plan update cycle.

**Next Steps**

The next steps are implementation of the recommendations at the pace established by County leadership. As indicated, the first eight improvements are top priority as they establish a framework that creates the predictability and efficiencies most sought by County applicants. Some require vetting through the County’s legislative process. Others are administrative decisions.

The Latimore Company is skilled at implementation and offers to guide the County through implementation of these improvements, easing the transition, accelerating the pace, and ensuring progress.

We thank the many County applicants and design professionals that contributed to this effort and to staff who embraced this work and participated with dedication to improving the predictability, efficiency and collaboration of the County development review process.