

Roundtable: FY 2012 Development Application Submissions and Processing

 Mark Pfefferle, Chief, Mark.Pfefferle@montgomeryplanning.org, 301 495-4730

Completed: 8-29-12

Description

A major function of the Development Applications and Regulatory Coordination (DARC) Division is the processing and tracking of all development applications submitted to the Planning Department. Staff will provide the Planning Board a synopsis of the number of plans submitted; plans approved; and review times for various application types. Wherever possible, staff will compare fiscal year 2012 data to previous years' data. This presentation is a precursor to a proposed Planning Board item in October when staff will be requesting that the Planning Board change our application fees.

Summary

- Number of development applications accepted are consistent with previous years
- Number of building permits accepted increased by 38%
- Number of record plats accepted increased by 35%
- Average number of hours to review plans remained consistent with previous years, except for mandatory referrals where hours per application decreased by 45%

Plans Accepted

The number of development applications accepted by the Planning Department for fiscal year 2012 is relatively consistent with fiscal years 2011 and 2010. The number of sketch plans, a new plan type has increased as more master plans come online with CR zoning. The data shows little deviation in the number of development applications. However, the number of building permit applications and record plats accepted increased. Exhibit 1 below identifies the number of plans accepted by plan type for the past three fiscal years.

Exhibit 1. Plans Accepted by Application Type and Fiscal Year			
Application Type	Fiscal Year 10	Fiscal Year 11	Fiscal Year 12
Preliminary Plans			
New Applications	35	38	38
<u>Amendments</u>	<u>20</u>	<u>18</u>	<u>20</u>
Subtotal	55	56	58
Site Plans			
New Applications	12	14	19
Major Amendments	1	3	3
Limited Amendments	17	8	12
Consent Amendments	8	13	4
<u>Administrative Amendments</u>	<u>34</u>	<u>30</u>	<u>29</u>
Subtotal	72	68	67
Project Plans			
New Applications	5	1	4
<u>Amendments</u>	<u>4</u>	<u>5</u>	<u>3</u>
Subtotal	9	6	7
Sketch Plans	0	3	5
Pre-application Plans			
Staff Review Only	5	8	2
<u>Staff and PB Review</u>	<u>1</u>	<u>3</u>	<u>4</u>
Subtotal	6	11	6
Record Plats	120	151	204
Subdivision Review Waivers	1	2	2
NRI/FSDs			
New Applications	96	90	77
<u>Recertification</u>	<u>17</u>	<u>9</u>	<u>7</u>
Subtotal	113	99	84
Forest Conservation Exemptions			
New Applications	137	141	122
<u>Recertification</u>	<u>2</u>	<u>0</u>	<u>0</u>
Subtotal	139	141	122
Forest Conservation Plans			
Preliminary Plans	37	29	36
Site Plans	7	4	11
Special Exceptions	3	9	9
Mandatory Referrals	21	21	8
Park FCP	2	6	5
<u>Sediment Control FCP</u>	<u>15</u>	<u>22</u>	<u>19</u>
Subtotal	85	91	88
Special Protection Area Plans	7	5	9
Special Exceptions	26	43	39
Development Plan Amendments	2	3	4
Local Map Amendments	2	2	5
Mandatory Referrals	53	36	44
Building Permits	819	737	1,022
TOTAL	1,509	1,454	1,763

The lack of increase in the overall number of development applications can probably be attributed to continued uncertainty regarding the economy. The data indicates a 35 percent increase in the number of plats submitted in fiscal year 2012 as compared to fiscal year 2011 and a 38 percent increase in the number of building permits received in fiscal year 2012. The increase in the number of plats accepted could be attributed to the County Council action that extended the preliminary plan validity period to April 2013. The increase in building permit applications received by the Department represents an increase in housing starts. This increase could be a sign that the demand for new housing is increasing, or that the previous inventory of new houses has diminished and the stock is being replenished. It would appear that applicants who received approvals in the past may feel that the time is right to move forward to actual construction.

Concurrently with the increase in record plat applications and building permits, which are the last step before construction starts, there has been a 15 percent decrease in the number of natural resource inventories/forest stand delineations (NRI/FSDs) from fiscal year 2011 and a 14 decrease in the number of applications for forest conservation plan exemptions. These two plan types are a necessary precursor before an applicant can submit a preliminary plan of subdivision, mandatory referral, and special exception. We will need to monitor the number of NRI/FSDs and forest conservation plan exemption submissions to determine if fiscal year 2012 was an outlier or evidence of a new trend where applicants are unwilling to submit plans.

Overall, the number of applications accepted by the Planning Department increased by 23 percent in fiscal year 2012 when compared to fiscal year 2011.

Plans Approved

Once an applicant submits a development application and it is accepted by the Planning Department relevant application data is entered into Hansen, our electronic tracking database, and given a unique identifier number. Hansen requires that the date the application is accepted, the date regulatory clocks are started and the date the application is approved or completed be recorded in the database. This data then allows the tracking of applications by numerous means including the number of plans accepted and approved, by division, during any specific timeframe including fiscal year. Exhibit 2 below indicates the number of plans received for fiscal year 2012. The exhibit also shows the number of plans, by plan type, that received a "final decision" in fiscal year 2012. Please note, plans with a final decision in fiscal year 2012 could have been accepted by the Planning Department in earlier fiscal years and, therefore, the number of plans with a "final decision" may be greater than the number of plans received for a plan type for a specific division. "Final decision" includes Planning Board approvals and denials on development applications, Planning Board recommendations and referrals on special exceptions, mandatory referrals, and zoning cases, and staff approvals and denials of certain forest conservation plans, NRI/FSDs, and forest conservation exemptions.

**Exhibit 2. Plans Accepted with a Final Decision by Application Type
and Division for Fiscal Year 2012**

Application Type	Area 1		Area 2		Area 3		DARC	
	Accepted ¹	Final Decision ²						
Preliminary Plans								
New Applications	13	7	7	9	18	14		
<u>Amendments</u>	<u>2</u>	<u>4</u>	<u>1</u>	<u>5</u>	<u>17</u>	<u>8</u>		
Subtotal	15	11	8	14	35	22		
Site Plans								
New Applications	6	3	6	5	7	8		
Major Amendments	2	2	1	1	0	1		
Limited Amendments	3	3	4	5	5	4		
Consent Amendments	0	1	3	4	1	1		
<u>Administrative Amendments</u>	<u>6</u>	<u>5</u>	<u>9</u>	<u>8</u>	<u>14</u>	<u>9</u>		
Subtotal	17	14	23	23	27	23		
Project Plans								
New Applications	3	2	0	0	1	0		
<u>Amendments</u>	<u>3</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>0</u>		
Subtotal	6	3	0	1	1	0		
Sketch Plans	0	0	5	2	0	0		
Pre-application Plans								
Staff Review Only	0	0	1	0	1	1		
<u>Staff and PB Review</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>1</u>	<u>4</u>	<u>2</u>		
Subtotal	0	1	1	1	5	3		
Record Plats							204	139
Subdivision Review	1	1	0	0	1	0		
Waivers								
NRI/FSDs								
New Applications	9	11	27	22	41	44		
<u>Recertification</u>	<u>0</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>6</u>	<u>6</u>		
Subtotal	9	12	28	23	47	50		

**Exhibit 2. Plans Accepted with a Final Decision by Application Type
and Division for Fiscal Year 2012**

Application Type	Area 1		Area 2		Area 3		DARC	
	Accepted ¹	Final Decision ²						
Forest Conservation Exemptions								
New Applications							122	130
<u>Recertification</u>							<u>0</u>	<u>1</u>
Subtotal							122	131
Forest Conservation Plans								
Preliminary Plans	8	5	10	1	18	8		
Site Plans	4	2	4	3	3	6		
Special Exceptions	1	0	4	0	4	0		
Mandatory Referrals	2	1	4	8	2	0		
Park FCP	1	0	0	2	4	2		
<u>Sediment Control FCP</u>	<u>2</u>	<u>0</u>	<u>4</u>	<u>3</u>	<u>13</u>	<u>12</u>		
Subtotal FCPs	18	7	26	17	44	28		
Special Protection Area Plans								
Special Exceptions	0	0	3	0	5	1		
Special Exceptions	16	1	13	3	10	4		
Development Plan Amendments	3	0	1	0	0	0		
Local Map Amendments	3	1	1	0	1	1		
Mandatory Referrals	16	11	11	10	14	10	3 ³	4 ³
Building Permits							1,022	1,282
TOTAL	104	62	120	94	190	142	1,345	1,541

1. "Accepted" refers to the number of new plan types submitted and accepted as complete.
2. "Final Decision" refers to plans approved, denied, or forwarded with a recommendation to other branches of County government, and plans that were approved, denied, or not confirmed by staff.
3. These plans were reviewed and processed by the Functional Policy and Planning (FFP) Division and not the Development Applications and Regulatory (DARC) Division.

The data indicates that Area 3 has received 46 percent of the development applications accepted in fiscal year 2012. Exhibit 3 below shows the percentage of applications received by each area team.

Exhibit 3. Number and Percent of Total Development Applications Accepted and Assigned to Area Teams for Fiscal Year 2012		
	Plans Accepted¹	
	Number	% of Total
Area 1	104	25
Area 2	120	29
Area 3	190	46
Total	414	100
1. Number of plans accepted does not include plans assigned to DARC or FFP divisions.		

Exhibit 4 shows the number of applications with a final decision by area team. Please remember, plans with a final decision will include plans accepted in previous years.

Exhibit 4. Number and Percent of Total Development Applications with a Final Decision by Area Team for Fiscal Year 2012		
	Plans with Final Decision¹	
	Number	% of Total
Area 1	62	21
Area 2	94	31
Area 3	142	48
Total	298	100
1. Final Decision" includes approvals and denials made by the Planning Board and Planning Recommendations to other government agencies. It also includes approvals and denials of natural resource inventories/forest stand delineations which are made by the Director's designee.		

The data shows that Area 3 receives the most development applications and correspondingly has the greatest percentage of plans with a final decision. Staff further analyzed the approval times to determine the percentage of plans approved within 6, 12, 18, 36, and 60 months from the date of application was accepted. Exhibit 5 below shows the results of this analysis. The final column in Exhibit 5 above indicates the numbers of plans pending that were submitted in that particular fiscal year.

Exhibit 5. Decision Rates from FY 2008 to July 12, 2012

	Approvals 0 to 6 months		Approvals 0 to 12 months		Approvals 0 to 18 months		Approvals 0 to 36 months		Approvals 0 to 60 months		Pending	
Submitted in FY2008												
35 Preliminary Plans	5	14%	17	49%	23	66%	31	89%	32	91%	3	11%
23 Site Plans	2	9%	19	83%	23	100%	23	100%	23	100%	0	0%
1 Project Plans	1	100%	1	100%	1	100%	1	100%	1	100%	0	0%
54 NRIs	40	74%	45	83%	46	85%	46	85%	47	87%	7	13%
<u>68 FCP Exemptions</u>	<u>59</u>	<u>87%</u>	<u>62</u>	<u>91%</u>	<u>63</u>	<u>93%</u>	<u>63</u>	<u>93%</u>	<u>63</u>	<u>93%</u>	<u>5</u>	<u>7%</u>
181 Total	107	59%	144	80%	156	86%	164	91%	166	92%	15	8%
Submitted in FY2009												
39 Preliminary Plans	6	15%	20	51%	27	69%	33	85%	NA	NA	6	15%
14 Site Plans	4	29%	11	79%	11	79%	12	86%	NA	NA	2	14%
2 Project Plans	2	100%	2	100%	2	100%	2	100%	NA	NA	0	0%
77 NRIs	69	90%	70	91%	72	94%	74	96%	NA	NA	3	4%
<u>134 FCP Exemptions</u>	<u>120</u>	<u>90%</u>	<u>127</u>	<u>95%</u>	<u>130</u>	<u>97%</u>	<u>133</u>	<u>99%</u>	<u>NA</u>	<u>NA</u>	<u>1</u>	<u>1%</u>
266 Total	201	76%	230	86%	242	91%	254	95%	NA	NA	12	5%
Submitted in FY2010												
34 Preliminary Plans	8	24%	20	59%	22	65%	27	79%	NA	NA	7	35%
12 Site Plans	8	67%	10	83%	11	92%	11	92%	NA	NA	1	8%
5 Project Plans	5	100%	5	100%	5	100%	5	100%	NA	NA	0	0%
91 NRIs	79	87%	85	93%	85	93%	86	95%	NA	NA	5	5%
<u>120 FCP Exemptions</u>	<u>102</u>	<u>85%</u>	<u>111</u>	<u>93%</u>	<u>115</u>	<u>96%</u>	<u>115</u>	<u>96%</u>	<u>NA</u>	<u>NA</u>	<u>5</u>	<u>4%</u>
262 Total	202	77%	231	88%	238	91%	244	93%	NA	NA	18	7%
Submitted in FY2011												
33 Preliminary Plans	9	27%	14	42%	18	55%	NA	NA	NA	NA	15	45%
13 Site Plans	7	54%	10	77%	12	92%	NA	NA	NA	NA	1	8%
1 Project Plans	0	0%	0	0%	0	0%	NA	NA	NA	NA	1	100%
90 NRIs	79	88%	85	94%	86	96%	NA	NA	NA	NA	4	4%
<u>134 FCP Exemptions</u>	<u>118</u>	<u>88%</u>	<u>127</u>	<u>95%</u>	<u>127</u>	<u>95%</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>7</u>	<u>5%</u>
271 Total	213	79%	236	87%	243	90%	NA	NA	NA	NA	28	10%
Submitted in FY2012												
38 Preliminary Plans	1	3%	4	11%	NA	NA	NA	NA	NA	NA	34	89%
19 Site Plans	3	16%	6	32%	NA	NA	NA	NA	NA	NA	13	68%
4 Project Plans	1	25%	1	25%	NA	NA	NA	NA	NA	NA	3	75%
74 NRIs	53	72%	57	77%	NA	NA	NA	NA	NA	NA	17	23%
<u>116 FCP Exemptions</u>	<u>113</u>	<u>97%</u>	<u>113</u>	<u>97%</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>3</u>	<u>100%</u>
251 Total	171	68%	181	72%	NA	NA	NA	NA	NA	NA	70	28%

For the most part, the data indicates that 90% of the plans submitted within a given fiscal year have a final decision within 18 months of the application acceptance. Few plans remain to be acted upon after 18 months. The data for fiscal year 2012 can be misleading since any plan submitted after January 15, 2012 would still be within the first six month period but falls into the pending status if it has not received a final decision. Those plans can still potentially receive a final decision within the first six months of the Planning Department acceptance of the application.

Outstanding Plans

In Exhibit 6 below, the last column in Exhibit 5 above is further broken down by area team to show the number of pending plans. The majority of the plans waiting a DRC response or a final decision are located within the Area 3 geographic boundary. Exhibit 6 further indicates the number and percentage of all development applications that need to submit revised plans in response to DRC comments or are waiting for a final decision from the Planning Department. The second and third columns represent the number of development applications that have already received comments from the Development Review Committee (DRC) and the Planning Department is waiting for applicants to respond to those comments. These are plans in which the Hansen review clocks are stopped. Columns four and five show the number of plans where the applicant has submitted information in response to DRC comments but the staff still needs to review the submitted information, obtain other agency approvals, and schedule a hearing with the Planning Board.

Exhibit 6. Number and Percent of Total Development Applications Waiting for DRC Response or Final Decision Since July 1, 2007				
	Plans Waiting for DRC Response		Plans Waiting for a Decision¹	
	Number	% of Total	Number	% of Total
Area 1	22	30	38	22
Area 2	12	16	32	18
Area 3	40	54	104	60
Total	74		174	
1. Does not include 269 plans waiting a decision from DARC and FFP. 2. Data as of July 9, 2012.				

For plans that are more than 18 months outstanding and that have had no activity within the previous 12 months, the Department will send letters to the applicants letting them know that they have 30 days to provide a justification as to why the plan should not be withdrawn. If no response is received, the

Department will notify the applicant that the plan is withdrawn. This will be done in full accordance with the Development Review Manual.

Application Review Times

The Hansen database allows staff to track application processing and review times. Exhibit 7 below indicates the number of plans accepted by the Planning Department and the average number of days it takes to review various plan types. The information shows the average review times for each Area Team and does not include any time or delays that may have occurred while waiting for an applicant to respond to comments, or when the Planning Department is waiting for other agency approvals before scheduling a Planning Board hearing. The average review times refer to the time it takes staff to process all applications of a particular type from plan acceptance to the Planning Board hearing. The term “average review days” does not include the time staff waits for applicants to respond to staff comments, nor does it include the time waiting for approval from other government agencies. In order to accurately capture the review time staff must start and stop the Hansen review clocks.

Staff has been directed by their Chiefs to keep the clocks current and up to date. There has also been concerted effort to enter the data for applications where none was previously entered and to update the data regularly. This analysis assumes all review clocks are up to date and accurate. The data enables staff to calculate the review times per plan and then average the review times across the divisions.

**Exhibit 7. Number of Plans with a Final Decision and Average Review Days
by Plan Type and Division for Fiscal Year 2012**

Application Type	Area 1		Area 2		Area 3		DARC	
	Plans with Final Decision ¹	Average Review Days ²	Plans with Final Decision ¹	Average Review Days ²	Plans with Final Decision ¹	Average Review Days ²	Plans with Final Decision ¹	Average Review Days ²
Preliminary Plans								
New Applications	7	124	9	81	14	137		
Amendments	4	64	5	94	8	70		
Site Plans								
New Applications	3	99	5	146	8	183		
Major Amendments	2	87	1	78	1	204		
Limited Amendments	3	39	5	70	4	115		
Consent Amendments	1	73	4	57	1	73		
<u>Administrative Amendments</u>	5	36	8	36	9	103		
Project Plans								
New Applications	2	109	0	0	0	0		
Amendments	1	86	1	69	0	0		
Sketch Plans	0	0	2	89	0	0		
Pre-application Plans								
Staff Review Only	0	0	0	0	1	84		
Staff and PB Review	1	143	1	92	2	58		
Record Plats							139	431
Subdivision Review Waivers	1	100	0	0	0	0		
NRI/FSDs								
New Applications/ Recertification	12	56	23	52	50	41		
Forest Conservation Exemptions								
New Applications/							131	38

**Exhibit 7. Number of Plans with a Final Decision and Average Review Days
by Plan Type and Division for Fiscal Year 2012**

Application Type	Area 1		Area 2		Area 3		DARC	
	Plans with Final Decision ¹	Average Review Days ²	Plans with Final Decision ¹	Average Review Days ²	Plans with Final Decision ¹	Average Review Days ²	Plans with Final Decision ¹	Average Review Days ²
Recertification								
Forest Conservation Plans								
Park and Sediment Control FCP ³	0	0	5	80	14	120		
Special Exceptions	1	101	3	248	4	157		
Mandatory Referrals	11	52	10	46	10	48	4 ⁴	115 ⁴
<ol style="list-style-type: none"> 1. "Final Decision" refers to plans approved, denied, or forwarded with a recommendation to other branches of County government, and plans that were approved, denied, or not confirmed by staff. 2. Review days are calculated from Acceptance to Decision minus all review stops. 3. Data is only available for forest conservation plan associated with park permit applications and sediment control plans. All other forest conservation plans are subordinate to a parent plan such as a preliminary plan or site plan. 4. These plans were reviewed and processed by the Functional Master Planning (FMP) Division and not the Development Applications and Regulatory (DARC) Division. 								

As can be seen from Exhibit 7 above review times vary across the divisions. Variations in “average review days” can be caused by the complexity and/or controversy of a specific plan; not maintaining the Hansen clocks; small data sets for specific plan types which means they are easily influenced by outliers; or when a plan presents a new issue that has never been addressed by the Planning Board in the past so it requires more time for analysis.

In addition to the average review times by application type we are able to identify the number of hours spent on various plan reviews by all staff. Exhibit 8 below compares the hours staff recorded for various application types for the three previous fiscal years. The hours reported are derived directly from staff timesheets.

Since the reorganization of January 2011 there is insufficient data to compare hours expended per plan type over multiple fiscal years to determine if the hours to review plans are getting shorter, longer, or remaining the same under the previous functional divisional format. We do know that staff is now reviewing multiple plan types which, in theory, increases efficiency and allows supervisors to respond to specific needs when demand increases for a specific plan type.

Exhibit 8. Comparison of Hours by Plan Type for Fiscal Years 2010, 2011, and 2012						
	Fiscal Year 2010		Fiscal Year 2011		Fiscal Year 2012	
	Applications Accepted ¹	Average Hours per Application ²	Applications Accepted	Average Hours per Application	Applications Accepted	Average Hours per Application
Preliminary Plans						
New Applications	35		38		38	
<u>Amendments</u>	<u>20</u>		<u>18</u>		<u>20</u>	
Subtotal	55		56		58	
Pre-application plan						
Staff Review only	5		8		3	
<u>Staff and PB review</u>	<u>1</u>		<u>3</u>		<u>3</u>	
Subtotal	6		11		6	
SRWs	<u>1</u>		<u>2</u>		<u>2</u>	
TOTAL	62	225	69	150	66	203
Site Plans						
New Applications	12		14		12	
Amendments	60		54		60	
<u>Certified Plans</u>	<u>NA</u>		<u>NA</u>		<u>NA</u>	
<u>Subtotal</u>	<u>72</u>	<u>134</u>	<u>68</u>	<u>102</u>	<u>72</u>	<u>119</u>
Project Plans						
New Applications	5		1		4	
<u>Amendments</u>	<u>4</u>		<u>5</u>		<u>3</u>	
<u>Subtotal</u>	<u>11</u>	<u>92</u>	<u>6</u>	<u>167</u>	<u>7</u>	<u>170</u>
Site & Project Concurrent Sketch Plans⁶	NA	NA	NA		NA	
TOTAL	83	147	77	123	84	121
Record Plats	120	17.6	151	12.9	204	16.5

Exhibit 8. Comparison of Hours by Plan Type for Fiscal Years 2010, 2011, and 2012						
	Fiscal Year 2010		Fiscal Year 2011		Fiscal Year 2012	
	Applications Accepted ¹	Average Hours per Application ²	Applications Accepted	Average Hours per Application	Applications Accepted	Average Hours per Application
NRI/FSDs						
New Applications	92		90		77	
<u>Recertification</u>	<u>17</u>		<u>9</u>		<u>7</u>	
Total	109	12.0	99	12.0	84	17.8
Forest Conservation Exemptions						
New Applications	134		139		119	
<u>Recertification</u>	<u>2</u>		<u>0</u>		<u>0</u>	
Total	136	8.8	139	8.5	119	7.6
Forest Conservation Plans						
Preliminary Plans	37		29		36	
Site Plans	7		4		12	
Special Exceptions	3		9		8	
Mandatory Referrals	21		21		9	
Park FCP	2		6		5	
<u>Sediment Control FCP</u>	<u>15</u>		<u>22</u>		<u>19</u>	
Total FCPs	85	78	91	64	89	61
Special Protection Plans	7	110	5	85	9	112
Special Exceptions	7	832	5	1,161	9	896
Development Plan and Local Map Amendments	4	1,261	5	397	7	315
Mandatory Referrals	53	125	36	146	43	69
Building Permits	819	3.5	737	2.5	1,022	2.8
Table Notes:						
1. "Applications Accepted" refers to the number of plans accepted by the Planning Department.						
2. "Average Hours per Application" refers the average hours it takes for staff to review that particular type of plan.						

Exhibit 8 does indicate that the average number of hours per application is relatively consistent with the two previous fiscal years. In particular, the average number of hours to review preliminary plans and site plans is similar to the hours shown for fiscal years 2010 and 2011. There are decreases in the average hours expended for special exceptions, development plan and local map amendments, and mandatory referrals.

Change in GFA and Dwelling Units for Fiscal Year 2012

The Planning Department received many different application types for fiscal year 2012. Some applications are for the creation of new gross floor area (GFA) and dwelling units (DUs), some are for amendments to previously approved plans that change a plan element but have no impact on GFA or DUs. In fiscal year 2012 the Planning Board approved 27 development applications, which will add

approximately 4 million square feet of gross floor area and 3,172 residential dwelling units to the pipeline.

Application Fee Changes

Staff is requesting permission to move forward on modifying the fee schedule for development applications. Currently, application fees for many plan types are based on number of dwelling units and/or square footage. Recent master plans have focused on increasing density in metro transit areas, where property owners are providing more density and square footage on footprints that are much smaller when compared to previous development patterns. The time to review plans is fairly similar whether a residential building is 3 stories or 15 stories, but since the current fee schedule is based upon dwelling units and square footage, the application fees can be high. Therefore, staff is requesting permission to further analyze the data to modify the fee structure based on factors other than on dwelling units and square footage, and present a revised fee schedule in October. If permitted to move forward with changes to the fee schedule staff will analyze all fees and modify those that need changing.