



**COUNTY OF SONOMA**  
**PERMIT AND RESOURCE MANAGEMENT DEPARTMENT**

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Approved: \_\_\_\_\_

Superior Court Judge

August 20, 2013

Date: \_\_\_\_\_

~~AUG 23 2013~~

The Honorable René Auguste Chouteau, Presiding Judge  
Superior Court of Sonoma County  
600 Administration Drive  
Santa Rosa, CA 95403

**FILED**

AUG 23 2013

SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF SONOMA

BY WJN DEPUTY CLERK

Honorable Judge Chouteau:

This letter contains my response to the recommendations in the 2012-2013 Sonoma County Civil Grand Jury report entitled: ***Permit and Resource Management Department: Is Change Permitted?*** This letter also includes my comments on the report itself.

**Response to Recommendations**

Recommendation R-1 (page 16): *The PRMD Director develop, implement, and ensure adherence to written training to consistently interpret and apply regulations by staff.*  
Recommendation R-1 has been implemented. The department has developed numerous written policies and procedures in order to achieve a consistent framework for analyzing facts presented by our customers to a myriad of different technical disciplines and regulations. In fact, the department has an adopted policy that addresses the development of such policies and procedures. As new issues arise—such as the need to address the consistency of certain interpretations—new policies and procedures are developed on an ongoing basis. Line staff, supervisors and managers are involved with this policy and procedure development to ensure alignment throughout the department. As we move into the future, the department will continue to train staff in applying the ever-changing regulatory schema with a consistency that supports our customer service mission. Our current plan is to continue to use PRMD Academy, staff meetings and continuing education to support this effort.

Recommendation R-2 (Page 16): *The PRMD Director formalize and implement a required ongoing customer service training program.*

Recommendation R-2 has been partially implemented as described below. Further analysis will be conducted this fiscal year to determine the merits of additional customer service training beyond what is in place now.

- In 2011, the department developed a customer service category within our standard performance evaluation in order to identify staff conduct that impacts customer service. This standardized tool provides supervisors and staff with the means of recognizing employees' abilities and behavior that improves our

customers' experience. It also gives us the means of coaching staff to improve service to our customers.

- PRMD reduced staff rotation at the customer service cubicles to improve service consistency and customer focus. In addition, all front cubicle operations were placed under the day-to-day management of the Customer Service Supervisor to further increase staff accountability around customer service issues.
- In addition, the department's monthly PRMD Academy in 2013 has focused on improving our service to internal and external customers.
- Customer service excellence is a regular and ongoing topic at all PRMD staff meetings, from line staff to senior management, and is a regular topic of communication from the Director to the entire staff.
- Finally, beginning in 2010, the department has identified that formal customer service training would help our staff learn skills to continue improving our delivery of excellent service to customers.

Due to the major staffing reductions at PRMD over the past several years, this formal training was not an option due to the cost and due to the dramatic organizational change caused by radical downsizing. During this fiscal year, the department will analyze the success of our current approach and evaluate whether additional formal training will increase our level of customer service. If the department so concludes, the new department head will seek funding to implement this long term goal as part of the department's FY 2014-15 budget.

Recommendation R-3 (Page 16): *The Board of Supervisors and the PRMD Director support and advertise the Ombudsman role in assisting clients.*

Recommendation R-3 has been implemented. As the department head, I have fully supported the creation and retention of this position and have for two years recommended that our annual budget support the position. The department under my direction has promoted this position to our customers and to the general public via press releases, high volume email campaigns, PRMD's website, and formal presentations to customer and stakeholder groups. The department has a plan in place to ensure we continue to promote this position so that our customers can continue to use the service of the Ombudsman.

### **Comments on the Report**

The Report points out that "government regulations make the planning process for land development complicated." This statement is correct, but it needs context. The regulatory system administered by PRMD is similar to most other coastal counties in California. This is because most development and construction regulations are adopted at the state level and implemented by local governments. Regulatory requirements have steadily increased in recent decades. For example, state (and federal) regulations pertaining to storm water management, wastewater treatment and disposal, endangered species, accessibility for disabled persons, energy conservation and green building and environmental review have all increased in

complexity and volume over the past 20 years. All of these regulations were adopted to protect life safety, human and/or environmental health or avoid discrimination (in the case of disabled access). They are well intended and contribute to an improved quality of life in our state, but there is a cost associated with implementation. The statement that *government regulations make the permitting process complicated* is a truism that would apply to any county or city in the state of California.

Local governments have limited authority to ease state and federal regulatory mandates. Nonetheless, in response to the economic recession, the Board of Supervisors adopted an “economic stimulus ordinance” that automatically extends the time for owners to act on approved planning entitlements and allows for reactivation of recently expired planning entitlements. This temporary economic stimulus measure, which was developed and recommended to the Board by PRMD, continues to save applicants time and money by eliminating the requirement to file new applications for expired planning entitlements or time extensions.

The Report found that “many clients have a negative perception of PRMD.” However, the reverse is equally true: *many clients have a positive perception of PRMD*. In fact, the overwhelming majority of the department’s customers report a positive perception of PRMD as evidenced by recent daily surveys completed by customers.

The Report also makes the sweeping statement that “staff interpretations are not consistent.” While this is *sometimes* true, context is important here too. Staff interpretations are affected by several factors:

- As noted above, the regulations themselves, most of which are mandated by state government, are increasingly complex.
- Nearly unlimited variation in project concept and design (as envisioned by customers) combines with site-specific property characteristics to create many unique or nearly unique regulatory circumstances.
- Customers often revise their project proposals after their initial submittal to the department, resulting in a change in how the regulations apply.
- Customers occasionally “shop” for a more desirable answer by posing similar (but often not identical) questions to different staff. Likewise, customers do not always provide complete information about their project to staff.
- The training, experience and skill of individual staff members vary.

Given these factors and the sheer volume of inquiries and transactions handled by PRMD staff on a daily basis, the level of consistency among staff is remarkable, though certainly not perfect.

I also take issue with the Report’s broad implication that PRMD and its staff do not provide high quality customer service. In fact, I believe this is an area where the department has made significant progress. No organization can claim that every staff

The Honorable René Auguste Chouteau, Presiding Judge

August 20, 2013

Page 4

member “always” follows appropriate customer service protocols (i.e., 100 percent of the time). The report does not define “appropriate customer service protocols” and the finding appears to be based on subjective perceptions from interviewees. Nonetheless, there are instances where individual PRMD staff do not deliver on the department’s goal of providing excellent customer service 100 percent of the time. When this occurs, PRMD management responds by coaching the staff on how to improve their customer service delivery and by following through with customers to provide solution-oriented approaches where possible given the regulatory circumstances. Our goal is one of constant improvement to bring staff to a more consistent level of excellent customer service including going as far as possible to deliver helpful and solution-oriented service to our customers while meeting our regulatory and adopted policy mandates.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Parkinson', with a long horizontal flourish extending to the right.

Pete Parkinson, AICP  
Director

cc: Board of Supervisors  
Court Executive Officer  
County Administrator  
County Clerk