

Permit Sonoma 2025

Management Review is a Beginning, not an End

SUMMARY

In August of 2024, the Sonoma County Civil Grand Jury set out to answer two simple questions: how many residential construction permits are issued in the unincorporated area of Sonoma County each year, and how long does it take to get a permit? Finding answers was harder than expected, and the inquiry became a more comprehensive investigation of Permit Sonoma.

Permits are required to construct (or modify construction of) any structure of public interest –meaning all residences and buildings that might be habitable or otherwise occupied by people. A permit is required to add or replace anything that might affect public or personal safety in a building: a water heater, solar panels, or even a new deck railing. Permits are a prerequisite to any work that must comply with legal requirements for environmental standards, zoning and property line encroachment, or any construction in a County “special area” with specific building style, placement or reflectivity constraints. A common perception of the permit process is that it will take forever to get a permit, cost way too much, and require more expertise and patience than the average person could possibly have. The Civil Grand Jury decided to assess this perception to see whether it is true for Permit Sonoma.

Delays in permit processing have the practical effect of hindering housing construction in many locales and can be an effective tactical tool to delay or prevent housing construction. Permitting delays lead to construction delays, which lead to housing shortages. Therefore, in 2022 the California State Legislature took action to reduce roadblocks by passing a law (Assembly Bill 2234) requiring *all* county and city permitting agencies to review and issue construction permits on a timely basis. Coincidentally, the Sonoma County Board of Supervisors concluded that the county would benefit from an independent review of construction permitting in Sonoma County and engaged Berry Dunn (a management and workflow consulting firm) to conduct a formal assessment of Permit Sonoma’s performance. The consultants’ final report was presented to the Board of Supervisors in January of 2023.

Equipped with this information, the Civil Grand Jury amended its inquiry and initiated a formal investigation of Permit Sonoma with the intent of answering these two questions:

1. Is Permit Sonoma meeting the requirements for permit review and issuance established by AB 2234?
2. Has Permit Sonoma made significant progress toward adopting and implementing the specific recommendations included in the Berry Dunn report?

The conclusion: Permit Sonoma is essentially meeting requirements for AB2234 and fulfilling the Berry Dunn Report recommendations. This report will tell you how Permit Sonoma’s performance compares with internal goals set in 2024 in response to the Berry Dunn report recommendations. The Civil Grand Jury also learned that Permit Sonoma’s workflow isn’t as efficient as it could be: there are loose ends to tie down and systemic impediments to overcome, and we will suggest how Permit Sonoma could make permit application better, faster, and cheaper in the future.

METHODOLOGY

The 2024-2025 Sonoma County Civil Grand Jury (Civil Grand Jury)

- Conducted more than 20 interviews with Permit Sonoma staff & leadership, third party contractors and service providers
- Reviewed and analyzed more than 500,000 data records related to construction permit applications
- Researched permit activity for other California counties and cities' timely performance, self-certification and over-the-counter permitting processes and workflow systems deployments
- Reviewed Sonoma County ordinances regarding Permit Sonoma (and its predecessor Permit and Resource Management Department) authority and Sonoma County building and safety codes

BACKGROUND

What is Permit Sonoma and What Does It Do?

Permit Sonoma (PS), formerly known and formally ordained as the Permit and Resource Management Department (PRMD), is a Sonoma County government agency established by Sonoma County Ordinance 4906 in 1995. It is responsible for regulating construction projects to ensure that new buildings, structures, or renovations meet local, state and federal standards for structural safety, health, environmental efficiency, and (in the case of 'area-specific plans') community expectations constraining land use, housing density, and construction appearance. Permit Sonoma is also charged with developing and organizing county-wide plans for new housing construction and critical review of proposed housing developments in the unincorporated areas of Sonoma County. In the words of Permit Sonoma senior leadership, "our mission is ... to support our entire community, through excellent customer service, to balance environmental protection with sustainable development."

Oversight of these processes means Permit Sonoma has enormous influence on construction efficiency in Sonoma County, from initial design to finished build—and if Permit Sonoma does its job well, County residents should see lower construction cost, faster project completion, and ultimately more and better housing at all price points. Conversely, inefficiencies in Permit Sonoma operations can slow down construction progress, delay project completion, and make housing more expensive at all price points.

Why Does Permit Sonoma Do What It Does, and Who Put Them in Charge?

Permit agencies play a crucial role in safeguarding public welfare and ensuring orderly development in communities. Their work addresses several key objectives:

- **Public safety:** Ensuring buildings are safe for occupants and the surrounding community, and preventing accidents or disasters, such as building collapses, fire hazards, or electrical failures.
- **Planning:** Assisting local governments with planning for sustainable development and helping balance growth with environmental considerations and infrastructure needs.
- **Reasonable use of and demand for public infrastructure:** Ensuring new developments do not overload existing infrastructure (e.g., roads, water systems, waste disposal) by adhering to guidelines that balance growth with available resources.
- **Compliance with local, state, and federal requirements:** Ensuring that construction projects comply with a broad range of legal requirements, from local zoning laws to state fire codes and federal accessibility standards.

In California, a permit agency's authority comes from both state and local governments. The State of California *grants overarching authority to local permit agencies* through state laws and regulations, particularly through the California Building Standards Code. California law allows local permit agencies to amend the state building code, in line with their own specific zoning laws and development guidelines. Specifically, localities may *add* specific requirements but *may not prescribe lesser standards* than are required by the state code. You can find an abridged version of Sonoma County's local building code on the PS website and a complete copy of County ordinances is also available online; chapters 7, 11 and 13 are particularly relevant.

The California Building Standards Code is updated every 3 years (most recently in 2022) and is largely based on the International Building Code (IBC). These updates are part of an ongoing effort to incorporate new knowledge, technology, and best practices for builders; improve building safety, sustainability, and energy efficiency; respond to emerging threats such as climate change; and incorporate advances in construction materials.

How Does a Permit Agency Ensure That Buildings Comply with the Building Code?

Permit agencies ensure that buildings comply with the building code through a two-fold process: **plan checks** and **inspections**.

Plan checks: Before construction begins, developers or homeowners submit their building plans to the permit agency. A trained plan checker reviews the plans to ensure they meet all relevant building codes, zoning laws, and safety standards. This step is crucial for preventing non-compliance before work even begins.

Inspections: Once construction starts, permit agencies conduct periodic inspections to ensure work is progressing according to the approved plans and building codes. Inspectors visit the site at various stages of construction, including foundation pouring, framing, electrical installation, and final completion, to ensure everything is up to standard.

If non-compliance is found during inspections, the construction project may be halted, and corrections will be required before the project can move forward.

Plan checkers and **building inspectors** typically have backgrounds in construction, architecture, or engineering. They are required to have specialized training and certifications to ensure they understand and can apply building codes effectively. The following qualifications are typical:

Education: A bachelor's degree or equivalent experience in civil engineering, architecture, or construction management.

A quick history of California Building Codes

California's first official statewide building code was established in 1927, with the adoption of the California Building Standards Code. The code has evolved since then, incorporating updates based on changes in technology, building materials, and safety knowledge.

What Major Laws lead to the California Building Code?

Over the years, several major laws have amended the California Building Code to address safety concerns, technological advancements, and changes in community needs. Here are some significant changes:

Title 24: Title 24, known as the California Code of Regulations, is a comprehensive set of regulations that includes the California Building Standards Code. This code governs all aspects of construction in California and was first established in the 1970s. Title 24 is regularly updated to reflect changes in building safety, energy efficiency, and accessibility standards.

The California Energy Code (Title 24, Part 6): One key amendment to Title 24 came in the form of more stringent energy efficiency standards. The state has continually updated these standards, aiming to reduce the environmental impact of construction and improve building sustainability.

The Americans with Disabilities Act (ADA): In response to the ADA, California made significant amendments to building codes to ensure accessibility for people with disabilities, mandating features such as ramps, wider doorways, and elevators in larger buildings.

Seismic Safety Laws: After devastating earthquakes in the 20th century, California's building codes were significantly amended to address seismic safety, especially in areas such as Los Angeles, San Francisco, and other earthquake-prone regions.

Certifications: Many plan checkers and inspectors hold certifications from organizations like the International Code Council or California Building Officials. These certifications indicate a professional's knowledge of building codes and construction practices.

Experience: Several years of practical experience in construction or a related field are often required before becoming a plan checker or building inspector.

How Many Permits Does Permit Sonoma Process?

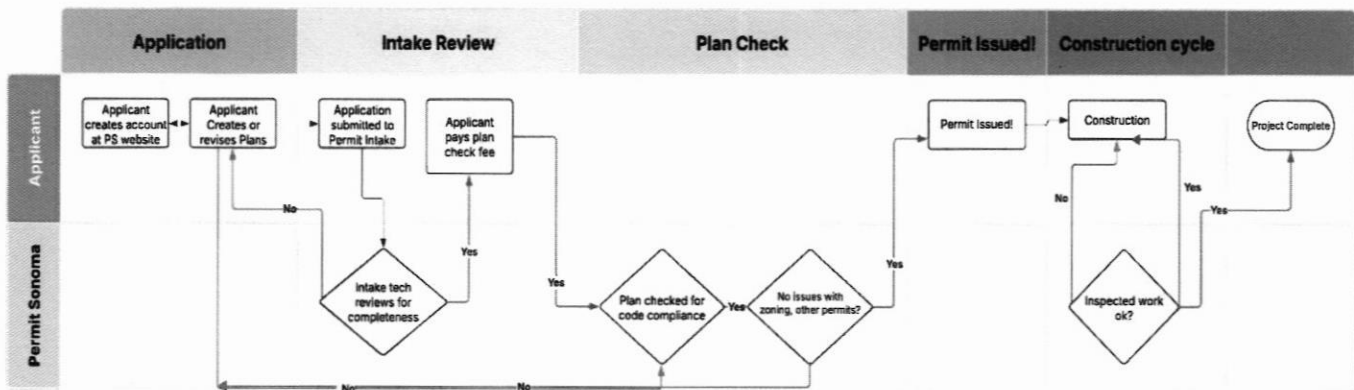
Below is a chart obtained from Permit Sonoma web site data:

Permit Sonoma Annual Activity Report				
Division	Permit Type	2022	2023	2024
BLD	Building	8,696	8,100	8,003
BLD	Building - Demolition	798	603	515
BLD	Building - Field Review	19	3	9
BLD	Safety Assessment	NA	67	115
	Subtotal, Building Division	9,513	8,773	8,642
ENG	Encroachment	532	518	389
ENG	Engineering Project	24	20	30
ENG	Grading	274	242	217
ENG	Surveys & Improvement Plan	368	13	28
ENG	Low Impact Development	16	3	11
ENG	Roiling	2	6	3
ENG	Sewer Construction & Fees	275	204	175
ENG	Storm Water	1	3	10
ENG	Transportation	858	682	685
	Subtotal, Engineering Division	2,350	1,691	1,548
W&S	Gray Water Systems	7	3	1
W&S	Septic Design	22	20	23
W&S	Septic	562	421	364
W&S	Well & Septic Field Review	890	597	391
W&S	Well & Well Study	558	431	464
	Subtotal, Well & Septic Div	2,039	1,472	1,243
PLAN	Admin Design Review	110	86	83
PLAN	Minor Subdivision	8	16	18
PLAN	Planning Project	34	27	28
PLAN	Use Permit	74	52	103
PLAN	Vacation Rental License	NA	266	1,334
PLAN	Water Resource Monitoring	223	14	46
PLAN	Zoning Permit	241	182	215
	Subtotal, Planning Division	690	643	1,827
	Total, Permit Sonoma	14,592	12,579	13,260
	<i>Total, Ex Vacation Rental Licenses</i>	14,592	12,313	11,926

This is an incomplete list, as there are at least a dozen more types of permits, including “design review”, environmental impact assessment and “building envelope modification”¹ applications. There is a noticeable decline in the number of permit applications since the peak (Covid) year of 2022. The data was developed from Permit Sonoma’s web site.

How does Permit Sonoma Do What It Does?

Applying for a permit is a fairly straightforward process, even though many (especially amateur/homeowner) applicants find the process daunting. Based on documents on the PS website describing permit application flow, here is a standard workflow diagram that encapsulates the process:



This diagram understates the complexity of the permitting process when the application is for more than simple permits (such as water heater replacement or electric panel upgrades): over and above construction code compliance, applications may need to be checked for conformance with local zoning, availability of septic capacity, and potentially dozens of related conditions. Regardless, Permit Sonoma’s basic workflow is the same: determine the list of applicable requirements; check the plans to see if they’re compliant; inform the applicant of any identified issues and request resubmission of conforming plans; or issue the permit when everything looks good. And, of course, collect permit application fees.

Prior to 2017, Permit Sonoma did everything on paper: record keeping was done manually, and permit applicants usually had no idea how far along the plan check path the permit had progressed, or even which engineer had been assigned to review plans. Permits, when issued, were on paper and paper copies of the permit were required to be attached to an official set of plans (maintained on site, along with a paper copy of inspection(s) records).

In 2017 (a few months before the Tubbs fire), Permit Sonoma contracted for a “Workflow Management” software package from a company, Accela, to keep track of “who’s done what, where, and when” with application paperwork. As the system was deployed across all PS departments, applicants began to benefit too: they could see online when an application had been accepted for plan check and get rudimentary information about the processing status of their permit application(s).

Then Covid hit in 2020 and shut down Permit Sonoma’s physical interaction with permit applicants. PS switched almost immediately to electronic submission of (formerly paper) plans. PS plan checkers

¹ “Building envelope” is the area of a zoned plot designated as the allowable building location. Plans to construct a building outside the recorded building envelope require an additional application and fee.

switched to electronic review of plan documents, which required running changes to the Accela workflow management system. It also exposed shortcomings in the workflow: communications previously handled by permit employees walking to an adjacent cubicle had to be done electronically. Accela modifications were the only practical solution, so during the next 2 years Permit Sonoma adapted by adopting and developing a series of changes to Accela-based workflow in conjunction with functional reorganization of “who does what”.

Today, every aspect of PS’s interaction with permit plans and applicants is (supposed to be) noticed and tracked in Accela so that staff, management *and applicants* can see their application status at any moment, including who has signed off, who still needs to sign off, and what changes (if any) are needed to get a permit issued. For the most part, the system works well enough. At any given time, PS has a thousand or more permits in some stage of completion, is working on 500-1,000 new applications every month, and the current state of each application can be seen on the PS web site.

Processing Permit Applications Faster: California Assembly Bill AB2234 (2022)

The Covid emergency elevated public awareness of California’s housing shortfall and multiple legislative efforts resulted: Project Homekey (AB 83, 2020) provided funding to convert hotels and motels into short term housing for homeless people; the California Home Act (Senate SB9, 2021) required localities to permit lot splits and accessory dwellings in many more places than had been previously allowed; and the Assembly passed AB 2011 in 2022, allowing residential housing on commercially zoned lots in locations that many cities and towns had forbidden.

In 2022, the state legislature concluded that one reason for the statewide housing shortage is that it simply takes too long to get permission to build. Many localities (generally *not* Sonoma County) use permit processing slowdowns as a first line of defense against housing development, and permitting delays were a significant contributor to the state’s housing construction issues. Assembly Bill AB2234 establishes a simple requirement: permit agencies are required to review a permit application for completeness within 15 (business days and completed applications must then be assessed for code and ordinance compliance within 30 business days. Failure to meet these deadlines carries a significant penalty: by law, *if a permitting agency doesn’t do its job consistent with the requirements of AB2234, the application will be considered accepted.*

Permit Sonoma is the Sonoma County agency that is required to meet these targets. Each “*Authority Having Jurisdiction (AHJ)*” in the County’s nine cities are also required to comply with AB2234. *NB: this report is limited to discussion and review of the County agency, not the city AHJ’s.* The statute includes definitions and legal caveats that add specific requirements and exceptions to this simple statement, but both the language and the requirements are straightforward and understandable. [A more comprehensive summary of the law is included in Appendix 1].

Improving Permit Sonoma Performance: The Berry Dunn Report

The Sonoma County Board of Supervisors (BoS) is ultimately responsible for the performance of all County agencies. In February of 2022, the BoS decided it would like an independent assessment of Permit Sonoma’s operations and engaged third party experts to conduct the analysis. In January of 2023, the list of calendar items on the County Board of Supervisors’ agenda included this notice:

“The Sonoma County Administrator’s Office (CAO) periodically conducts department reviews to evaluate County departmental programs, operational, and organizational effectiveness. Permit Sonoma was selected for review.”

... “The consultant, Berry Dunn McNeil & Parker LLC (BerryDunn) delivered the results from their management review of Permit Sonoma to the Board of Supervisors on January 31, 2023. Permit Sonoma is actively working to

implement changes identified in the review, make our permitting more efficient, and improve our customer service.”

The Berry Dunn Report (BD Report) includes many observations regarding PS workflow and behavior, and concludes with 15 specific recommendations in three general categories:

1. Change the way Permit Sonoma works, in ways that benefit the customer.
2. Establish explicit permit processing performance targets and make sure that hard data exists to measure throughput.
3. Ask your customers to tell you how PS can do a better job and then do what they tell you.

Permit Sonoma leadership reviewed these recommendations with the Board of Supervisors in February of 2023, and *accepted all of Berry Dunn’s recommendations*.

How well is PS doing towards these goals? According to a management update delivered to the Board of Supervisors in February 2024, Permit Sonoma has done a great job of achieving all of its objectives:

“In aggregate, the result is a 67% reduction in processing times across the department’s most common permit types without compromising critical compliance reviews that keep our community safe.”

	Average Days to Review		Reduction
Permit Type	June 2023	Dec 2024	
Building Permit	71	23	68%
Encroachment Permit	49	22	55%
Grading Permit	82	41	50%
Septic Permit	98	21	79%
Well Permit	123	18	85%
Average			67%

Permit Sonoma’s update to the Board of Supervisors concludes as follows:

“...the service that is being delivered to the residents of Sonoma County has been continually strengthened over the last 18 months. In addition to the average 67% reduction in permit response times the department has strong customer service scores from our permit center surveys with a positive response of 95.41% out of 1,592 survey respondents.... has also resulted in stronger working relationships between the department’s six divisions and has laid the groundwork for improving employee recruitment, onboarding, and retention.”

DISCUSSION

Is Permit Sonoma Compliant with AB2234 Requirements?

Assembly Bill 2234 has two distinct timely review requirements: first, that submitted applications be reviewed for documentary completeness within 15 business days and either accepted or returned to the applicant with specific notice of any insufficiency; and second, an accepted application must be reviewed for compliance with construction codes, zoning and planning ordinances within 30 business days of acceptance.

Requirement 1: 15 Days to Review an Application for Completeness

The Permit Intake department is the PS gateway for all new permit applications and is also the department tasked with explaining document review requirements to prospective permit applicants. We reviewed thousands of 2024 initial permit applications and are pleased to report that *Permit Intake only*

failed to review applications for completeness and acceptability within the 15-day limit a handful of times – out of more than 7,000 permit applications. That being said, the way that Permit Intake interacts with Accela makes it VERY difficult to prove the truth of this statement: AB2234 makes it clear that if an applicant is informed that documentation is incomplete or inadequate, the 15-day clock resets. However, Permit Sonoma's Accela system doesn't reflect the reset so PS Permit Intake's Accela data can't be used "as is" to report permit acceptance performance versus AB2234 requirements.

One of the senior managers within Permit Sonoma has developed a 'work around' for this Accela system shortcoming: Permit Intake records are extracted from Accela and inserted into a homebuilt Microsoft Access database, wherein a series of scripts and queries converts the inconsistent Accela data into a form that allows for Intake and Acceptance date calculations. The results of this data manipulation are used to inform PS management about its general performance (and identify problematic applications nearing the 15-day limit) but is not the permanent and auditable solution that would exist if Accela were modified to integrate this functionality.

Requirement 2: 30 days post-acceptance to Review and Comment on Plan Issuance

After a plan is accepted by Permit Intake technicians, applicants are required (in most cases) to pay for the time it will take Permit Sonoma to review the details of the proposed work for compliance with building codes, zoning requirements, stormwater and erosion control, and myriad other rules governing permit issuance. Payment of this plan check fee triggers a second clock under AB2234: review the plans and issue the permit within 30 business days or tell the applicant why it isn't acceptable. These "Plan Check Comments" are required to be specific and comprehensive, such that an applicant knows exactly what changes need to be made to application documents for successful plan resubmission.

AB2234 requirements presented new but (mostly) manageable processing timelines for Permit Sonoma. The most challenging problem still hasn't been solved: while each of the plan check department managers have their own way to keep track of plan check engineers' progress, PS's Accela system implementation doesn't include management reporting that reliably tracks the amount of time between the "Plan Check Fee Paid" date and the date when comprehensive Plan Check Comments are sent. When multiple departments are required to review the plans, Accela records the date when each department does its work, but there is no systemic recognition of the requirement for *all* departments to complete their work within 30 business days—and if any one department hasn't finished its work, they can all be deemed to have failed to meet the statutory requirement.

The Civil Grand Jury knows this is a problem because it tried (on multiple occasions over many, many hours) and failed to identify a programmatic method for confirming the actual amount of time PS was taking to get from plan check start to first comments sent. Interactive review with PS staff and management confirmed that the problem is real: the Accela database can be queried to retrieve sets of records that are representative of the work being done, but there is no way to *reliably and consistently* calculate how much time has elapsed since the clock started ticking—and it will take PS and Accela a significant amount of work to fix this problem. The Civil Grand Jury shared this experience, with multiple members of Permit Sonoma staff and management, and confirmed that this is a known problem within PS. The recognized "solution" is the ad hoc Microsoft Access system referenced above — with the same caveats: the integrity of PS's Access-based tool is neither audited nor auditable, and its maintenance depends on a single individual. If that person leaves the department, critical knowledge may be lost.

Caveats and concerns aside, the Civil Grand Jury can report that a time-consuming manual review of more than 5,000 permit review task status records for the months of February and October, 2024 found

that fewer than 20 of ~1,100 permit applications requiring plan check failed to meet the AB2234 requirements. All of the failures were permits that required review by multiple departments; *and we saw meaningful reductions in overall processing time between February and October of 2024.*

Has Permit Sonoma Fully Implemented the Berry Dunn Report Recommendations?

California Civil Grand Juries are chartered to conduct independent inquiries and investigations into local government operations, so in the words of the old Russian adage that Ronald Reagan repeated to Mikhail Gorbachev: “Trust but verify”. Here’s what we learned about Permit Sonoma’s progress toward implementing the Berry Dunn recommendations:

1. Berry Dunn categorical recommendation: change how PS works in ways that benefit the customer

In Permit Sonoma’s traditional workflow, plan check was a serial process and each person in the queue waited to be notified that the person before them had completed their task. Berry Dunn suggested an alternate approach: work in parallel and use the Accela system’s workflow management capabilities to keep track of “who’s done what” using systems-based tools to trigger additional review as needed. Implementing this approach required several significant changes to Permit Sonoma operational process:

- Establish Standard Operating Procedure: Everyone in the workflow chain needs to use a known and standardized set of operating procedures (SOP).
- Integrate the Procedural Steps into the Accela Workflow: These procedural steps need to be incorporated in the Accela system so when significant progress is made, everyone who needs to know (including the customer) is informed—and conversely, when issues arise, people who can fix the problem are invited to do so.
- Permit Sonoma had to find ways to deal with seasonal loads that increase the volume of plan checks in excess of PS capacity.
- Permit Sonoma should have the ability to outsource plan check and certification of field work to third parties whenever practical, especially in cases where this would produce customer cost savings. One major point of emphasis was review of permit types to see how many additional types of permits could be issued “over the counter” to reduce the number of simple applications flowing through a system designed to handle complex permits.

BD Recommendation: Establish Standard Operating Procedures

Similarly skilled personnel in different departments all work in similar ways, but the absence of globally standard operating procedures (SOPs) for Accela nomenclature, combined with inadequate staff training regarding Accela system changes and updates means that SOPs aren’t actually standardized across departments. For example, almost everyone in Permit Intake and the six plan check departments uses a personal checklist to review application documents, but there is no universal checklist that is used department-wide in any PS department—let alone standardized across all of Permit Sonoma.

PS has undertaken an agency-wide effort to develop SOPs for each PS department but only one department (Code Enforcement) has actually published a document that could reasonably be described as a formal SOP framework; most other departments have made an effort to initiate SOP development but have considerable work to do to complete this task. After the individual departments are done establishing their own SOP’s, the entire agency needs to finish the task by

establishing and implementing standardized cross-department procedures—a task that hasn't been started, let alone completed.

Failure to implement efficient and *standard* operating procedures is costing Permit Sonoma money and time and is an opportunity for future improvement.

BD Recommendation: Integrate Procedural Steps into the Accela Workflow

The good news is that PS customers have *much* more visibility into the status of their permit application than they had even one year ago. One HUGE improvement: customers can see the names and phone numbers/email addresses of the individuals assigned to process their permit applications so they know who to contact when questions arise or when the review process is stalled. Additionally, inconsistencies in task names and status have been reduced (although there are still instances where departments use different names for the same task).

The bad news? As currently implemented by Permit Sonoma, Accela only handles process tracking, not workflow management. There's more work to be done on the Accela implementation and no plan to do it. While the data for each individual permit application is reliable, highly likely to be accurate, and shared with the applicant, *two permits for exactly the same type of work, processed by different Permit Sonoma employees, may be described differently in the Accela system* and/or recorded more or less accurately. Consequently, the Accela system as implemented by PS doesn't produce reliable reports on individual and aggregate employee performance. Given the fact that reports generated externally via Microsoft Access are not integrated into Accela, their results are impossible to verify independently.

BD Recommendation: Develop Systemic Awareness of Interdepartmental Collaboration Requirements

Complex permits for major remodels and new construction usually require action by multiple PS departments with overlapping requirements. For example, a building permit might require a well and septic permit that calls for additional leach field capacity—which requires agreement by Engineering that the site can be graded—before issuing a permit involving additional bedrooms. Permits can't be issued until all conditions are met, and when they involve multiple PS departments, each department needs to be systematically aware of outstanding tasks that must be completed before other departments can finish their work.

The Accela system currently tracks task status within each department but has no facilities (other than engineers posting "Read Me" comments) for communicating interdepartmental dependencies. A true systematic workflow would recognize these dependencies and ensure that every permit's interdepartmental status and sequence is understood across all of PS. This shortcoming results in systemic delays and is also the reason that sometimes permits get "lost" while each department waits for another department to act.

Commercial entities often use "program management" systems and personnel to ensure that complex processes proceed in an orderly fashion. Currently, no individual or department within Permit Sonoma is tasked with ensuring that all necessary inter-department work proceeds on a timely basis. Complex permit processing—especially for projects that involve both Planning and Engineering review and require public notice—would benefit from PS adoption of standard program management methods.

The remaining Accela work recommended by Berry Dunn should be completed, even though it will require currently unbudgeted work and additional management attention, for 3 reasons:

- 1) Management, staff and applicants should know at every point along the permit issuance path how much time has been taken to get to issuance, and how much more time is left before the permit can legally be presumed to have been issued. This requirement is implicit in AB2234's statutory requirement.
- 2) Interdepartmental communications regarding "Who's doing what, and are they done yet?" is the single biggest challenge that PS has toward achieving significantly improved permit throughput for complex applications. Fixing systemic issues preventing the simple calculation and reporting of elapsed time will also reduce time wasted by one department not realizing that another department had finished its work. While this problem doesn't happen as often as it used to, it shouldn't happen at all.
- 3) Permit Sonoma senior management, the County Executive, and the Board of Supervisors cannot know how well the Permit Sonoma staff is doing its job until this problem is fixed.

As currently implemented, the workflow system is far from perfect. It could certainly be easier to use (for both applicants and staff), more comprehensive in its record-keeping capabilities, and provide much more "exception reporting" to facilitate management and customer insight and intervention. If Permit Sonoma workflow is improved, permit processing could be much faster for everyone—and cheaper, too. So, regarding this group of Berry Dunn recommendations, "there are still a few bugs in the system" and Permit Sonoma has more work to do. PS's Board of Supervisors update is generally accurate, *but tasks recommended by Berry Dunn are not as complete as has been reported.*

2. *BD Categorical Recommendation: Use Third Party Plan Check and Self-Certification to Cut Permitting Times*

The Berry Dunn report made five specific recommendations to help applicants get permits more quickly at lower cost. By adopting the BD recommendations, Permit Sonoma committed to the following:

- Over the Counter Permitting: Expanding the range and scope of permits that could be issued "over the counter".
- Express Permit Review: Implementing an Express Permit review process that would engage all reviewing departments concurrently (instead of each department waiting until precedent reviewers had completed their work).
- Third Party Plan Check: Employing (licensed and certified) 3rd party engineering firms to augment the Permit Sonoma plan check staff both for cost-saving and load management purposes.

The Civil Grand Jury reviewed permit application data to see whether the impact of each of these initiatives could be verified. Permit Sonoma staff and management were interviewed to gather their collective opinion on the success of (and enthusiasm for) changing workflow in these ways. Here is a brief summary of learnings:

BD Recommendation: Over the Counter Permitting (OTC):

One might think that a search for "over the counter" on Permit Sonoma's website would lead to a description of all the work that can be permitted this way... perhaps even a specific form or forms that would make a simple permit application fairly painless. One would be wrong.

The search returns just 10 documents, and here is *all* the text in those 10 documents that actually refers to "over the counter" building permits:

"Building permits for minor work, such as a re-roof, new water heater, electric upgrade or other work that does not involve any structural modification, can be issued over the counter." and (regarding installation of new electric service to residential or commercial construction) "Residential Service...400 amp or less: No plans required. Can be issued over the counter with no plan check."

That's all. No form and certainly not a complete list of work that can be permitted over the counter. Here is a more complete list of work that may be permitted "over the counter" without plan check required (obtained by reviewing actual permits issued over a 6-month period):

- Water heater replacement
- New electric service and meter replacement
- Replacement of heating and cooling systems
- Replacement of roofing shingles not requiring structural modifications
- Siding replacement
- Some (but not all) residential solar panel installations
- Sidewalk and driveway repair
- Minor interior remodels with no structural changes
- Minor demolitions such as septic tank destructs
- Covered parking waivers, legal nonconforming determinations
- Temp campaign signage
- Designating structures as Accessory Dwelling Units
- Residential setback reduction with neighbor approvals
- Telecom tower modification

Permit engineers were asked to suggest other items that could or should qualify. For example, if an electric service is upgraded, could the load panel design be self-certified by a licensed master electrician? How about installing a Level 2 EV charger in a garage? Or even replacing an air conditioner and forced air heating system with a heat pump? Virtually everyone we spoke to had ideas for work that could be permitted OTC, but *no one in authority has plans to actually add OTC permit types* to the list. Nor is there a formal process to submit additional types of OTC permit recommendations.

BD Recommendation: Express Permit Review

The idea for "express permitting" came from within Permit Sonoma staff, and it's simple and exciting: put someone from every department responsible for reviewing routine building permit applications in the same room, (virtually) pass the plans around the room to see whether any department has material concerns, and (finding none) approve the permit on the spot! The goal is to eliminate the typical delays that happen during serial application review and ensure that every department that needs to review an application does so on a timely and rapid basis. And... it works!

The process was tried for the first time in the fall of 2024, with excellent results: half a dozen permit applications were reviewed and issued in an afternoon, saving weeks of time for applicants with no additional work on Permit Sonoma's part. Since then, the Express Permit team (an ad hoc group with one engineer from each plan check department in Permit Sonoma) has been meeting (almost) every week and the Express Permit team self-reports that the process works well, is effective, and saves both applicants and Permit Sonoma time and money. Permit Sonoma staff says they plan to continue, and possibly even expand, collaborative application review in the future beyond the 8-10 typically processed during the current pilot.

Why not make Express Permit review the default SOP? Reportedly, expanding the scope and scale of the Express Permit program would require changes to organization structure and ‘additional resources’ (meaning more staff) so significant expansion of this innovation is unlikely.

The Civil Grand Jury disagrees with PS management on this point: knowledgeable members of staff believe a much higher percentage of permits could be processed using the Express approach without additional resources, and observations suggest that the staff is correct. The “express permit” process doesn’t work well for complex projects with significant engineering challenges, but these applications are a small fraction of Permit Sonoma’s residential construction volume.

BD Recommendation: Self-certification of construction plans and installation methods

This is a concept that every quality builder has wondered about since permits were first required in ancient times. The BD Report recommended that licensed (and insured and certificated) professionals including architects, structural and civil engineers, master electricians and plumbers and other specialty engineering trades should be allowed to check their plans for code compliance and certify that their work has been done conformant to both plan and code, rather than have to call a County inspector to come to the jobsite and check it for them.

This isn’t a new idea, nor is it original to Sonoma County: the city of Bellflower has had a plans self-certification program for some years; Riverside County allows self-certification of a variety of construction work and Los Angeles is considering a new ordinance allowing self-certification in the wake of the devastating Eaton and Palisades fires, in hopes of expediting fire rebuild construction. Sonoma County has also experimented with self-certification. Permit Sonoma allows over-the-counter permitting for roofing material replacement, with self-certification of the work after it’s done, and a majority of roofing replacement is already being done this way. Permit Sonoma is also considering (but has not yet committed to) allowing some earthwork and grading to be self-certified in the future.

Permit Sonoma staff are not optimistic about significant expansion of this program, however. A quick look at this February 2025 Permit Sonoma activity report will demonstrate that the majority of Permit Sonoma building permit applications (289 of 525) require no plan check – but still charge a plan check processing fee – and 25-50% of the remaining applications are for solar panel and battery installations which are largely routine designs.

Examples of allowable “Building Permit No Plan Check” applications include (in addition to roofing) hot water heater replacement, window replacement, electrical panel replacement, deck board and home siding replacement, plumbing fixture replacement, sidewalk repair, and driveway repair. All seem to be good candidates for self-certified inspection by master tradespeople.

It should also be noted that, in other locations where self-inspection of trade work is allowed, the Authority Having Jurisdiction (i.e. Permit Sonoma in our case) retains the *right* to inspect. In most other AHJ’s, inspections are conducted randomly *with loss of self-certification privileges resulting from failed inspections*.

BD Recommendation: Third Party Plan Check

The analysis done to produce the Berry Dunn report occurred at a time when Permit Sonoma had a big backlog of permit applications. Covid workflow hadn’t yet been fully implemented and many people decided to use their new-found at-home time to launch renovation and rebuilding projects. The result was a significant increase in the time it took to issue a permit. In response, Berry Dunn recommended 3 things:

1. Pay third party resources—i.e. commercial engineering firms with qualified and certificated plan reviewers on staff—to bring down the backlog.
2. Expand applicants' access to (and awareness of) the availability of third party plan check resources in lieu of Permit Sonoma application review; and
3. Implement checklist-based initial review and resubmittal procedures to ensure that plan checks would be conducted consistently, regardless of which Permit Sonoma or third-party person did the review.

Permit Sonoma did fulfill both of the first two recommendations. It contracted with three private engineering firms and, by year-end 2024, had reduced the backlog to levels that Permit Sonoma management can handle using on-staff reviewers. It also published a [list of nine third parties](#) that applicants can pay to review plans on an expedited basis. The cost of third party review is incremental to (somewhat reduced) plan check fees charged by Permit Sonoma.

Item 3, however—a task that is reportedly “complete” on Permit Sonoma’s Board of Supervisors update—is still a work in progress. While almost all Permit Sonoma plan checkers have a checklist they use to conduct their reviews, *they all use different checklists and none of those checklists are public*—which reduces both the presumed benefit and cost savings that were the basis of the Berry Dunn recommendation.

3. BD Categorical Recommendations: Establish Explicit Performance Targets and Systems Improvements to Improve Throughput and Reduce Cost

This group of recommendations are the most essential changes proposed by the BD management review. Berry Dunn observed that while Permit Sonoma staff works hard, it could work smarter. To that end, BD recommended five changes that collectively could increase Permit Sonoma management *and* applicant visibility into plan check productivity.

The first task was for Permit Sonoma to clearly identify how long it should take to review permit applications. Conveniently, AB2234 established statutory requirements for turnaround time so that task was complete.

The four remaining tasks—still works in progress—were to modify the Accela workflow system to keep track of how much time is being spent on each individual permit review, and then use experiential data to establish plan review timetable expectations.

A rudimentary implementation of this time tracking capability was added to Accela, and some (but not all) plan checkers include their estimate of the ‘time on task’ in their Accela data. However, there is no systematic management review of the data, nor is there any systemic requirement that this data be recorded for every permit so the task (while “complete” in PS task tracking reports”) hasn’t actually been done.

Has PS made progress toward establishing explicit performance targets and implementing systems improvements?

Metrics, metrics, metrics: Management consultants implore organizations and their leaders to define clear goals and then measure performance toward them. Berry Dunn made a good effort to advance the appreciation of metrics by PS management, but it appears to have fallen on deaf ears.

PS has very few Accela system-generated performance analysis reports and the principal reports telling senior management (and the public) how Permit Sonoma is performing are created by a single skillful but self-taught senior manager who creates data queries using Microsoft Access (an application that isn’t

supported by Sonoma County Information Systems and is definitely not intended by Microsoft to be enterprise software). There are no other Access developers on the staff at Permit Sonoma. Accordingly, if and when that singular senior manager retires or chooses another path, the entire corpus of Permit Sonoma management metrics will need to be refactored.

What metrics are missing? The place to start is "time on task", both individually and collectively. Permit Sonoma should know, specifically, how much time is being spent on primary tasks like plan review, site visits, staff education, and preparation and attendance at public meetings. Objective data would result in clear appreciation of both individual and collective performance. Less obviously, capturing time spent on secondary tasks, such as composing and responding to customer communication, interacting with applicants in an advisory context, or even addressing BoS constituent inquiries, would help management decide where to invest in training, tools, and resource allocation.

The other major benefit of improved performance metrics: quantifying the volume of work being done is essential to calculation of appropriate fees. Conversely, not knowing how much time it takes to do a type of work makes it impossible to know whether agency fees are charged correctly. Multiple staff members raised this concern, with consensus that both PS and its customers would benefit from understanding the true costs associated with permit application review and approval.

Government agency performance is mandated (and often limited) by a myriad of statutes, codes and ordinances; and budget constraints are a fact. But every enterprise, private or public, can benefit from setting clear performance goals and measuring progress towards them. Permit Sonoma has chosen not to prioritize the benefits that would result from rigorous metric assessment of its own performance and is unlikely to achieve optimal performance until it does.

Other Categorical Berry Dunn Report Recommendations

The Berry Dunn recommendations were grounded in the presumption that Permit Sonoma *should* want to deliver more, better, and faster customer response. While the foregoing topics were the principal mechanisms for achieving these goals, there were also 3 recommendations for expanding customer focus, improving customer interaction, and more and better communication.

The goal of Berry Dunn's customer relationship management recommendations was to reflect a



When it comes to service we dig deep!

Permit Sonoma Customer Service Values:

- S - Solution-Oriented: Provide customer-focused, realistic solutions.
- H - Helpful: Be attentive and friendly.
- O - Ownership: Be accountable, proactive, and follow through.
- V - Versatile: Adapt to diverse needs and backgrounds of customers.
- E - Efficient: Maximize resources and strive for timeliness and accuracy.
- L - Listens: Engage and empathize to resolve customer concerns.

"You can't manage what you don't measure" Peter Drucker

"Measure what is measurable and make measurable what is not so"
Galileo Galilei

"If you don't know where you're going, you'll end up someplace else" Yogi Berra

"The things that get measured are the things that get done." Tom Peters

"If you can't measure it, you can't improve it" Peter Drucker

"Measure twice, cut once"
Mike Brady

commitment to customer-centric behavior in PS workflows: some combination of more, better, faster, cheaper service for builders and their customers. Permit Sonoma's SHOVEL initiative summarizes the message that Permit Sonoma has chosen to encapsulate its customer service program, and this graphic is pretty much the entire program:

If Permit Sonoma succeeds at improving internal processes and making the workflow system better, then getting permits approved or rejected as quickly as possible will follow naturally.

Berry Dunn Report Review Conclusions

The authors of Permit Sonoma's Berry Dunn management review presented a clear prescription for Permit Sonoma's workflow systems issues, but PS still hasn't been able to do what Berry Dunn said it should do. There is inconsistent systematic recognition of simple permits and expedited plan check, no systematized task checklists for intake or plan check, no integral recognition of due dates, time on task, or even which permits are overdue, and very limited ability to generate reliable management and performance metrics. Permit Sonoma has made an excellent beginning toward implementing all of the other recommendations included in the Berry Dunn report.

Other Observations about Permit Sonoma

Any report that purports to be comprehensive will have limits and exclusions, and sometimes the exclusions are more significant than the included material. This report is like that: the list of what wasn't learned may be more important than what is covered.

What Questions About Permit Sonoma Weren't Answered?

- How long does it actually take to do a plan check? Anecdotal statements in interviews and data recorded by some plan checkers suggests that a typical residential construction plan check takes 4-8 hours of staff time, but the Accela system doesn't capture (or require staff to record) real processing times.

Why does this matter? According to both state law and Sonoma County ordinances, fees charged should only cover actual costs incurred and the cost of a plan check should clearly correlate with the amount of time it takes—but since PS doesn't record how much time is spent on each plan review, plan check fees are averaged based on an opaque estimate of amalgamated staff and overhead expense that literally no one thinks is representative of the actual work being done. Bad actors who require multiple reviews or excessive amounts of plan rework (or submit design changes in the middle of the review) are often charged the same amount as applicants who submit a fully compliant, properly annotated set of plans that can be reviewed in a few hours.
- This study did not review how Permit Sonoma conducts inspections or code enforcement. In hindsight, it was a significant omission. Inspections are a time-consuming and expensive element of construction permitting and Permit Sonoma's inspections department is reported to do an excellent job of being both responsive and comprehensive. As self-certification programs evolve, the inspections department must lead the way towards determining the correct balance between improving operational efficiency and ensuring public safety. Similarly, the code enforcement process (which happens when builders and property owners fail to secure permits or build structures that don't meet code, zoning and planning permit requirements) is an opaque intersection of authority meeting the reality of personal and public interest and safety. It isn't clear that Permit Sonoma code enforcement is worthy of the applause that most other PS divisions deserve.

- Why do permits cost as much as they do and how much should they cost? Permit Sonoma's current fee schedules are based on a "fee study" published by a contracted consultant in 2021 using methods that meet state requirements for fee analyses. The consultant applied a legal, but not particularly thoughtful, formula which basically divided total department costs by total hours worked. The resultant fees aren't based on actual time spent on permit processing. Permit Sonoma, like many other County agencies, does a great deal of work on the public's behalf that has little to do with the cost of processing permit applications. The fees collected from home builders and developers cover many costs that are loosely (or not at all) related to the direct cost of the services that PS provides to builders, and this fact was of concern to many of the Permit Sonoma staffers that were interviewed.
- How much, and why, is so much unpermitted work being done? We suspect that complex permit application processes and excessive permit fees are why there is so much unpermitted work.
- Why does it take as long as it does to process permit applications? If a permit plan check takes 4-8-12 hours, why does it take 4-8-12 weeks to work its way through the system? Could most permits be issued in days or weeks instead of months if PS were a bit more ambitious?

The Future of Permit Sonoma

During the course of this investigation, the Civil Grand Jury inquired about the behavior of other Authorities Having Jurisdiction in California. One learning from this research is that permitting agencies play an important role in the state of housing development in California and the statewide housing shortage can't be overcome without improvement in permitting agency performance.

It is highly likely that technology solutions are imminent and much of the work needed to review plans for code and ordinance conformity will be automated in the next 5 years. This should free the many knowledgeable and experienced people at Permit Sonoma to do work that can't be automated: coaching builders and their customers on construction best practices, compliance with legal mandates, fire-sensible construction alternatives, and alternate approaches to environmentally sensible construction. In other words, improving public safety in meaningful ways.

CONCLUSIONS

Permit Sonoma plays a significant role in Sonoma County public safety and, in answer to the two questions that the Civil Grand Jury set out to answer, Permit Sonoma is doing what it's supposed to do: processing thousands of permit applications on a reasonably efficient basis and complying with state mandates for timely review. Although the Civil Grand Jury can't be absolutely certain that Permit Sonoma is meeting its legal obligation to process permits as quickly as AB2234 requires, our research suggests that PS is compliant. We wish we could prove it.

The fact that the case can't be proven is a problem that must be corrected. PS's workflow systems need work and don't support PS management or (more importantly) permit applicants' need for better and more automated access to individual and overall performance metrics.

This absence of meaningful plan check performance data precluded inclusion of permit cost analysis in this Civil Grand Jury study. Permit Sonoma doesn't know whether the fees it charges fairly reflect the work it does because the workflow systems don't capture time-on-task data in ways that are necessary to complete the analysis. Capturing this data programmatically would be more efficient, and fair, than repeatedly hiring fee study consultants who imagine creative legal methods to justify fee schedules.

PS has done a fine job of accepting and interpreting the Berry Dunn report recommendations and made an excellent *plan* to achieve these recommendations. Victory was declared prematurely, however: there is still meaningful work to be done *and it would be a shame to stop short of full implementation*. Permit Sonoma has completed the initial phase of its management review. Now, staff must focus on continued process improvement with particular emphasis on improving customer service and empowering additional express permitting teamwork. Factors such as lower permit volumes and smarter fulfillment of regulations will require Permit Sonoma to operate with greater efficiency and embrace new technology to do better work, faster, at lower cost in the future. Permit Sonoma management's report to the Board of Supervisors, while generally accurate, glosses over work that still needs to be done *and funded*.

The Civil Grand Jury concludes that PS is doing a good job of accepting and reviewing permit applications on a timely basis and has both opportunity and organizational capability to be more ambitious. A moderate additional investment in the workflow platform – and staff with the skills to improve it as needed – will produce significant gains in Permit Sonoma efficiency and an excellent return on investment for Sonoma County builders and taxpayers.

CIVIL GRAND JURY FINDINGS

- F1. Permit Sonoma meets California Assembly Bill 2234 (2022) requirements for initial acceptance of permit applications on a timely basis.
- F2. Permit Sonoma generally meets AB2234 (2022) requirements regarding review of permit applications within 30 business days.
- F3. The Civil Grand Jury was unable to conclusively verify AB2234 (2022) compliance because Permit Sonoma workflow systems do not *reliably and consistently* capture elapsed time for permit reviews.
- F4. Permit Sonoma is not able to factually report permit review and approval throughput because its workflow tracking systems are not capturing data on a consistent and reportable basis.
- F5. Permit Sonoma has made excellent *plans* to implement all of the Berry Dunn management review recommendations, but its reports overstate the actual progress observed by the Civil Grand Jury.
- F6. Full implementation of Berry Dunn management review recommendations will take additional application development resources that are not currently in place within Permit Sonoma.
- F7. Other than compliance with California Assembly Bill 2234 (2022), Permit Sonoma senior management has not established objective expectations for staff performance regarding plan review or timely permit issuance.
- F8. Permit Sonoma does not provide information to the public about over the counter and express permit review requirements and opportunities in a manner that is easily accessible and comprehensive.
- F9. Permit Sonoma permit intake and plan check staff need additional workflow systems training to ensure accurate data entry and consistent use of status reporting conventions.

CIVIL GRAND JURY RECOMMENDATIONS

- R1. By October 17, 2025, Permit Sonoma shall require that all employees record, within the workflow systems, time spent on task for permit intake and plan check, site visitation, field inspection and code enforcement review.
- R2. By December 19, 2025, Permit Sonoma shall develop a plan to implement all workflow system changes required to capture and report, in a reliable and sustainable manner, individual employee and collective permit throughput; and agency compliance with California Assembly Bill 2234 (2022) timely performance requirements.
- R3. By December 19, 2025, Permit Sonoma will establish and publish objective performance and throughput goals regarding permit review and approval.
- R4. By December 19, 2025, Permit Sonoma shall review and make available on its website and other publicly accessible documents all over the counter permit processes and requirements.
- R5. By December 19, 2025, Permit Sonoma shall review and publish its requirements and expectations for express permit review and approval, third party plan check, permit and inspection self-certification, and use of program management techniques to fulfill all Berry Dunn Report recommendations.
- R6. By December 19, 2025, Permit Sonoma shall review and publish an accurate update to its January 2025 Board of Supervisors report on progress toward fulfillment of the Berry Dunn report recommendations.
- R7. By March 27, 2026, Permit Sonoma shall determine whether additional resources are required to fully implement the workflow system upgrades needed to fulfill all Berry Dunn Report recommendations and communicate such incremental budget requirements to the County Executive Officer and the Board of Supervisors.
- R8. By March 27, 2026, Permit Sonoma will review, publish (and require consistent staff usage of) requirements checklists for issuance of all permit types.
- R9. By March 27, 2026, Permit Sonoma shall review and update its workflow system training materials and protocols for all Permit Intake, Plan Check, and Planning personnel.
- R10. By March 27, 2026, Permit Sonoma shall establish and publish, in a consistent format, standard operating procedures for all Planning, Building, Engineering, Well & Septic, and Code Enforcement permit issuance/compliance review processes.
- R11. By May 1st, 2026, the County Executive shall review Permit Sonoma's resource requirement noted in Recommendation 7 for inclusion in the Board of Supervisors' 2026-27 budget review.
- R12. By July 10, 2026, and annually thereafter, Permit Sonoma shall publicly post an accurate annual report of each department's permit processing performance and compliance with timeliness requirements of 2022 California Assembly Bill 2234.
- R13. By July 13, 2026, or as soon thereafter as allowed by budget authority, Permit Sonoma shall implement workflow system upgrades sufficient to ensure that individual and collective throughput performance is captured and reported in a reliable and consistent manner.

RESPONSES REQUIRED:

Findings F1-F9: Permit Sonoma

Recommendations R1-R10, R12-13: Permit Sonoma

Recommendation R11: County Executive and Board of Supervisors

Reports issued by the Civil Grand Jury do not identify individuals interviewed. Penal Code Section 929 requires that reports of the Civil Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Civil Grand Jury.

APPENDIX 1. SUMMARY OF CALIFORNIA ASSEMBLY BILL AB 2234 (2022)

Title: AB 2234 – Post entitlement Phase Permits

Authors: Assemblymembers Robert Rivas and Tim Grayson

Signed Into Law: September 28, 2022

Effective Date: January 1, 2023

AB2234 includes provisions that address what happens if local jurisdictions fail to meet the specified deadlines for processing housing permit applications. If a local agency does not adhere to the 30- or 60- business day limit for reviewing applications, the application is deemed approved under certain conditions. This serves as a form of penalty by automatically moving the project forward if the local agency does not act in time.

The focus is on ensuring that housing projects are not unduly delayed by bureaucratic processes. This system of deemed approval encourages local governments to prioritize and expedite their review processes, indirectly penalizing them by removing their ability to deny or request further changes to applications that they do not review within the mandated time frames.

Purpose and Background

AB 2234 was introduced to streamline and bring greater transparency and efficiency to the post entitlement permit approval process for housing developments in California. The bill is a response to significant delays and inconsistencies in the approval of post entitlement phase permits (such as grading, demolition, and building permits) at the local level, which have historically hindered housing production.

This legislation builds upon previous housing reform efforts, including SB 330 (2019), which aimed to expedite the housing approval process by limiting local governments' ability to delay projects.

Key Provisions of AB 2234**1. Standardized Timelines for Permit Approvals**

- Local agencies must review and decide on post entitlement housing permits within specific timeframes:
 - 30 days for projects with ≤ 25 housing units
 - 60 days for projects with > 25 housing units
- If the local agency finds that an application is incomplete, they must notify the applicant within 15 business days with a detailed list of missing information.

2. Online Permit Tracking and Transparency

- Local governments are required to maintain an online system where applicants can:

- Submit applications electronically
- Track the status of their permits in real-time
- Receive notifications of any required modifications
- This provision is aimed at improving government accountability and reducing bureaucratic inefficiencies.

3. Restrictions on Permit Denials

- Agencies cannot reject a post entitlement phase permit unless they provide:
 - A written explanation detailing the reasons for denial
 - References to specific laws, ordinances, or codes that justify the rejection
- If a permit is denied, the applicant has the right to appeal, ensuring due process.

3. Standardized Checklists:

- Cities must develop and publish objective checklists detailing permit application requirements, ensuring clarity for developers.

4. Scope and Applicability

- Applies to all local jurisdictions in California.
- Covers post entitlement permits for residential developments that have already been approved through zoning and land-use approvals.
- Does not override the California Environmental Quality Act (CEQA) or other state/local regulatory requirements but ensures that the final approval process is not unnecessarily prolonged.

Expected Impact

- Accelerates housing production by preventing unnecessary delays.
- Enhances transparency in the local permitting process.
- Supports affordable housing initiatives by reducing regulatory barriers.
- Reduces construction costs by providing a more predictable and efficient permitting process.

Conclusion

AB 2234 is part of California's broader housing reform efforts aimed at addressing the state's severe housing crisis. By ensuring that post entitlement permits are processed within reasonable timeframes, the bill helps remove bureaucratic roadblocks that often delay much-needed housing developments. It represents a significant step toward streamlining housing construction, making the process more efficient, transparent, and predictable for developers and home

APPENDIX 2. COUNTY MUNICIPAL CODE

Ordaining Permit Sonoma (formerly Permit & Resource Management Division) as the *Authority Having Jurisdiction* in unincorporated Sonoma County.

See Municipal Code, Section 7 for a more comprehensive list of Permit Sonoma authorities.

Sec. 7-5. - Building permit required.

- a) No person, firm or corporation shall erect, construct, enlarge, alter, repair, move, improve, convert or demolish any building or structure in the unincorporated area of this county, or cause the same to be done, without first obtaining a separate building permit for each such building or structure as required by this chapter. Permits shall be issued and fees shall be collected by the permit and resource management department. The building standards for the work authorized by the new permit shall be governed by the codes in force at the time of the new permit application as described in Chapter 1, Division I, of the California Building Code as to the erection and construction of dwellings and appurtenant structures for which construction was lawfully commenced, commenced to legalize a violation, or approved prior to the effective date of this ordinance.
- b) Permits shall not be issued by the permit and resource management department for work which includes any of the following, unless and until written approval has been received:
 1. The construction, alteration or modification of: (i) Any on-site disposal system (approval required from the well and septic section of permit and resource management department), (ii) Any water supply system which under state law or county ordinance is required to have a permit to operate (approval required from the health officer or the state health services department), (iii) Any establishment selling or preparing food or food products, any public or semi-public swimming pool as defined in the 2013 California Administrative Code (approval required from the health officer);
 2. The construction, alteration or modification of any structure which will result in the structure being connected to an on-site wastewater disposal system or water system; (approval required from the well and septic section of permit and resource management department),
 3. The alteration or modification of any existing structure which is connected to an on-site wastewater disposal system or water system requiring a permit, where the alteration or modification may impose additional burdens upon the existing system, such as, but not limited to, the addition of rooms or the modification of floor plans for potential additional occupancy. This section shall not apply to repairs, such as replacement of roofing or siding. Where the permit is for modification or alteration of an existing structure, no permit will be issued where, in the determination of the chief building official, such modification is likely to result in exceeding the capacity of the system;
 4. The construction, alteration or modification of any structure which may result in the property being improved in excess of its capacity to absorb sewage effluent. This section is intended to cover any change in the property which might adversely affect sewage disposal such as, but not limited to, grading or the construction of a barn or swimming pool which might infringe on the leach field (approval required from the well and septic section of permit and resource management department);
- c) For the purposes of this section, approval by the well and septic section of permit and resource management department shall mean either an office clearance, field clearance, or issued well and septic permit for on-site wastewater disposal system.
- d) Whenever approval of the on-site wastewater disposal system is required, it shall be based upon the requirements imposed by this chapter and any other state or local law or regulation which may be applicable, including basin plans and other standards promulgated by the North Coast Water Quality Control Board and the San Francisco Bay Regional Water Quality Control Board.
- e) Building permits must be cleared as to zoning considerations in Chapters 26 or 26C, grading and drainage requirements in Chapter 11, and stormwater requirements in Chapter 11A of this Code. Building permits for

projects regulated by the California Fire Code and Sonoma County fire safe standards may be subject to review and approval by appropriate fire service agencies. Where county road encroachment is necessary, a permit for same shall be first secured. A water and/or sewer clearance is first required in areas serviced by special districts and cities before building permits can be issued.

- f) Notwithstanding any other provision of this chapter or the codes adopted hereby, emergency maintenance work or repair of buildings and structures requiring a permit hereunder may be commenced before obtaining a permit without violating this chapter provided the permit and resource management department or the public health officer, in the appropriate case, is notified prior to noon of the next following business day and the permit required is obtained within twenty-four (24) hours thereafter, and provided further that no work shall be covered before it has been duly inspected and approved. Compliance with the State Subdivision Map Act, the Sonoma County subdivision regulations, and the Sonoma County zoning regulations, including compliance with conditional permits issued thereunder, and compliance with all laws, is a condition precedent to the issuance of any permit required by this chapter for work to be done on any particular parcel of real property in the unincorporated area of this county.
- g) As a condition precedent to the issuance of a building permit required by this section for which an application was made on or after November, 1989, the applicant shall pay to the county development fee as specified in Section 26-98-660 of this Code. The permit required for Section 105 of Appendix 1 of the California Building Code for structures subject to the requirements of this subsection shall not be issued unless and until the development fee has been paid.
- h) Within flood-prone urban areas as defined in Section 7-13(a)(10), a building permit authorizing excavation for foundations shall not be issued until a disposal location for excavated material has been designated. Acquisition of a building permit does not relieve the permittee of the responsibility for acquiring any other state and local permits required for the activity.
- i) In any unincorporated portion of Sonoma County where stormwater discharges are subject to the requirements of one or more NPDES permits, as referenced in Chapter 11, any construction site for which building permits are approved pursuant to Chapter 7 must be developed and used pursuant to any applicable requirements of said NPDES permit(s). Failure to adhere to applicable NPDES permit requirements at any time will be deemed to be a violation of this section and may subject the permittee to the penalties established by this chapter. Permittees may meet this requirement by filing with the Regional Water Quality Control Board the appropriate notice of intent to comply with the state general construction activity stormwater permit or by obtaining approval of an individual NPDES permit from the Regional Water Quality Control Board.