



**Doña Ana County**  
**Community Development Services Efficiency Review**

**July 2020**

**Management  
Partners**





# Management Partners



July 14, 2020

Mr. Fernando Macias  
County Manager  
Doña Ana County  
845 N Motel Blvd.  
Las Cruces, NM 88007

Dear Mr. Macias:

Management Partners is pleased to transmit this report, which contains our analysis of the functions and operations of the Community Development Department, including Doña Ana County's development review processes and workflow. This report contains analysis and recommendations about the following:

- Current operations of the Community Development Department;
- Development review business functions, workflow processes and the use of technology;
- Peer benchmarking and best practices;
- Survey and interview results from development review customers; and
- Recommendations for improvement.

A summary of the 49 recommendations is included in Attachment A.

During our review we have observed and interacted with County staff that are dedicated and knowledgeable about development review roles and processes. Staff from Community Development, Public Works, Fire Department and Flood Commission have been willing to provide information freely, as well as offer ideas for improvement.

Thank you for the opportunity to assist you and Doña Ana County.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Newfarmer". The signature is fluid and cursive, written over a light gray rectangular background.

Jerry Newfarmer  
President and CEO



---

## Table of Contents

---

<b>Executive Summary .....</b>	<b>1</b>
Research and Learning .....	1
Development Review Process .....	1
<i>Simple Challenges</i> .....	2
<i>Complex Challenges</i> .....	2
Summary .....	4
Organization of Report .....	4
<b>Purpose.....</b>	<b>5</b>
<b>Approach and Methodology .....</b>	<b>7</b>
<i>Staff and Stakeholder Interviews</i> .....	7
<i>Customer Survey</i> .....	8
<i>Best Practices in Peer Agencies</i> .....	12
<i>Process Workflow Mapping</i> .....	13
<b>Community Development Department Overview .....</b>	<b>14</b>
Staffing and Organization Structure.....	14
Workload Activity.....	19
<b>Assessment of Development Review Process .....</b>	<b>21</b>
Overview .....	21
Applicant Perspective.....	22
Availability of Information .....	22
Pre-Application .....	24
<i>Incomplete Submittals</i> .....	24
<i>Pre-Application Meeting Preparation and Attendance</i> .....	25
<i>Fees for Pre-Application Review</i> .....	26
<i>Pre-Application Meeting Follow Up</i> .....	26
Application Intake and Determining Completeness.....	27
<i>Online Submittal Alternative</i> .....	27
Review of Entitlements.....	28
Routing of Plans .....	29
Sequential and Concurrent Review of Plans .....	30

---

Building Plans.....	31
<i>Timeliness of Reviewing Building Plans</i> .....	32
<i>Process for Reviewing Building Plans</i> .....	33
<i>Staffing</i> .....	35
<i>Development Review Committee</i> .....	37
<i>Process for Compiling Comments on Plans</i> .....	39
Inspections.....	40
<i>Inspection Requests</i> .....	40
<i>Combination Inspections</i> .....	40
<i>Virtual Inspections</i> .....	41
<i>Self-Certification</i> .....	42
<b>Other Development Review Issues .....</b>	<b>44</b>
Fire Department Review .....	44
<i>Staffing and Workload</i> .....	44
<i>Challenges</i> .....	44
<i>Alternative Service Delivery Options</i> .....	45
Use of Checklists .....	46
Review of Minor Projects .....	46
Technology .....	48
<i>System Functionality</i> .....	48
<i>Inconsistent Use of Technology</i> .....	49
<i>Training</i> .....	49
<i>Future Technology Investments</i> .....	50
<i>Technology Upgrades in Other Public Agencies</i> .....	50
Expedited Plan Review.....	51
Project Managers .....	52
Development Processing Fees .....	53
<i>Cost Recovery</i> .....	53
<i>Support from Development Community</i> .....	54
<i>Stakeholder Feedback</i> .....	54
Performance Measurement.....	55
<b>Conclusion.....</b>	<b>57</b>
<b>Attachment A – List of Recommendations.....</b>	<b>58</b>
<b>Attachment B – Process Maps .....</b>	<b>61</b>
<b>Attachment C – List of Agency Websites .....</b>	<b>62</b>
<b>Attachment D – Technology Upgrades in Other Public Agencies .....</b>	<b>63</b>
<b>Attachment E – Sample Performance Measures.....</b>	<b>64</b>

---

---

Pre-Application and Intake Phase .....	64
Plan Review and Routing Phase .....	64
Permit Issuance and Inspection Phase .....	65

## Tables

---

Table 1. Which best describes your role in the development process? (Check all that apply) ..	9
Table 2. Components of the Doña Ana County development process that you/your company have used in the past three years. (Check all the apply) .....	10
Table 3. On a scale of 1 to 10 with one being worst and ten being best, how would you rate Doña Ana County’s development review process for the following? .....	11
Table 4. In your view, what components of the development review process most need improvement? (Check all that apply).....	11
Table 5. Community Development Department Staffing.....	14
Table 6. Peer Jurisdiction Development Review, Coordinating Department and Functions ..	18
Table 7. Building Services Workload in 2019 .....	19
Table 8. Survey Respondent’s Views on the Adequacy of Development Review Materials and Website Information.....	22
Table 9. Levels of Agreement with Plans Review, Comments and Timely Feedback.....	32
Table 10. Would you support a fee adjustment in Doña Ana County if the fees were used to provide supplemental staffing or other resources to improve development review service levels? .....	54
Table 11. Would you support an additional technology fee in Doña Ana County if the fee was used to upgrade existing technology resources to improve development review service levels? .....	55

## Figures

---

Figure 1. How long ago did you conclude your most recent involvement with Doña Ana County (from application submittal to completion)? .....	9
Figure 2. Community Development Organization Chart.....	16





## Executive Summary

Doña Ana County hired Management Partners to conduct a review of the development review process with the goal of improving efficiency and customer service. Improvements to these services are an organizational priority in significant part because Doña Ana County is a gateway for international trade, and it serves as a hub in the region for housing, transportation, retail and services. In fact, Doña Ana County is the second most populated county in New Mexico, and it continues to grow. The County experienced a double-digit population increase from 2000 to 2015.

Management Partners has helped numerous local governments address the challenges of improving the timeliness, efficiency and service levels for development review, permitting, and inspection processes. These processes are critical so local governments and their private-sector partners can facilitate the growth and investment that builds and sustains vital communities.

### ***Research and Learning***

Our work began with a careful research and learning phase. We reviewed numerous documents and analyzed a variety of data provided by the County. We also conducted extensive one-on-one interviews, first with a variety of County staff members and later with a representative sample of past applicants and developers.

Management Partners also convened collaborative meetings with County staff to map the workflows of current development review process. The resulting process map diagrams help to illustrate the County's systems and identify where inefficiencies and bottlenecks may occur. Lastly, we administered an anonymous online survey to a larger group of County applicants, businesses, developers and other stakeholders. This was an important supplement to the individual interviews and helped to ensure broad feedback.

### ***Development Review Process***

The development review process in Doña Ana County incorporates many of the best practices used in other counties and public agencies. This is an

important conclusion because it means that the County's process does not require wholesale change. However, the internal systems the County uses are not as well coordinated as they could be, and this can lead to substantial delays and confusion for customers and staff alike.

For instance, the County has a pre-application review step for applicants. This is a best practice because it provides customers with important information and input about their intended projects at the earliest possible point. Pre-application review can also help customers assess their projects and make informed business decisions about whether or how to proceed. We learned, however, that too much of the pre-application review in Doña Ana County is geared toward explaining the process instead of delving into the merits of the projects and the other key issues customers want to know about.

### **Simple Challenges**

One relatively straightforward problem in the County's processes relates to incomplete project submittals (plans, applications, reports). Incomplete submittals are a common problem in many jurisdictions, but they present a significant impact on the development review process by making it difficult to confirm whether a project complies with the various requirements. This often results in multiple cycles of review and delay.

The task of routing plans to and from the various County departments for review is also a problem. Routing of plans is an example of dead time during which no actual work on a project occurs. The time added during incremental routing steps can result in multiple days of unnecessary delay.

Sequential review of plans is another relatively simple problem that should be addressed. Doña Ana County reviews for zoning and flood compliance first, and then commences with the remainder of the project review. We understand the County's goal was to not begin the full plan review process for projects that did not comply with other fundamental requirements. While the goal is understandable it results in delays that can be avoided.

### **Complex Challenges**

Reviewing plans for compliance with building, fire/life safety, engineering, flood control and other technical codes and requirements is a complicated endeavor. For instance, a well-functioning development process requires effective technologies to analyze and monitor the numerous projects, each at each of the various review stages. However, this is a significant challenge in Doña Ana County.

Managing complicated development review processes without effective technology is nearly impossible because critical information is not available to managers, staff and customers. Clear and comprehensive information about how the overall review process is working, as well as how it is working for individual projects, is essential to making improvements.

The County uses iWorQ as its land management system, but this application is ineffective because not all departments use it. It is also not clear that the application provides the detailed development tracking and performance reporting that is necessary to proactively manage the overall process. As a result, there are gaps in the data. In fact, some departments have created separate, standalone applications such as Excel spreadsheets to track projects. We also learned that a lack of training on the use of iWorQ has been an impediment.

Accordingly, it is clear that investing in technology upgrades and aligning internal use of technology are necessary. This will be especially important in order to implement a performance measurement system for the development review process. Measuring performance is a best practice used in other jurisdictions to improve and manage outcomes.

Of course, an effective development process also requires key staff in the various departments who have the substantial technical training and experience to do their jobs. We repeatedly heard from staff and customers that there are not enough staff resources in certain functions, such as engineering. This had also been a problem in Building Services though we understand the department has been able to hire additional plans examiners. Providing adequate staffing where the workload requires it will be essential.

A similar staffing problem exists in the field during the inspection phase. Of course, contractors depend on prompt inspections to keep projects moving forward and ensuring their workforce remains engaged. But Doña Ana County has three inspectors for the entire County. Just covering the expansive geography makes this problematic.

The best practice is to conduct building inspections within one business day, though this is a difficult goal to achieve without efficient internal systems and sufficient staff. We understand inspections in Doña Ana County can take between two and three days on average. Therefore, expanding the inspection capacity should be a primary goal for improvement.

## **Summary**

This report assesses the development review process and identifies 49 recommendations for change and improvement. Several improvements can be made with relatively simple changes, which will result in greater efficiency and better service to customers. Other improvements will require a sustained effort and more resources in key areas. Management Partners will be providing a draft Implementation Action Plan as a separate deliverable, which will serve as a guide for how to prioritize and proceed with the improvements.

## **Organization of Report**

This remainder of this report is organized into six sections, as follow.

- Purpose,
- Approach and Methodology,
- Community Development Department Overview,
- Assessment of the Development Review Process,
- Discussion of Other Issues, and
- Conclusion.

Our research regarding peer agencies and their practices, together with outreach to customers (including the survey we conducted), is summarized in the *Approach and Methodology* section.

The analysis and core recommendations for the development process are presented in order of the development process workflow in Doña Ana County, in the section entitled *Assessment of Development Review Process*. Finally, we focus on other areas and issues, including important best practices, in the section entitled *Other Development Review Issues*.

## Purpose

Though the work of the development review process is coordinated through the Community Development Department (principally by staff in the Planning and Building Divisions), it requires substantial collaboration with and assistance from staff in other functional areas such as engineering, utilities, fire and the Flood Commission.

Moreover, these efforts are guided by the County mission statement and several of the County's seven guiding principles, specifically those involving area development, economic development and infrastructure.

### Mission Statement:

*Doña Ana county government enhances the health, safety, and quality of life for all residents as determined by law and community interests. Services are provided through innovative leadership and teamwork in a fair, respectful and professional manner.*

### Guiding Principles for Area Development, Economic Development and Infrastructure:

***Area Development:*** Throughout Doña Ana County – from the smallest colonia to the City of Las Cruces – development will be proactively managed so that land use, transportation, utilities, affordable housing, and public facilities are fully integrated, mutually supportive, and respectful of the unique qualities of each community.

***Economic Development:*** Economic development will be supported in all areas of the county and for all segments of the population so that communities throughout the county are viable, a diversified growth strategy is maintained, and every resident can find work that supports a good standard of living.

***Infrastructure:*** Roads, utilities, flood control structures, public facilities, and other infrastructure systems will be planned, built, and maintained to address critical needs, and maximize

*economic viability for government entities, taxpayers, and businesses.*

The development review process is a highly visible and complex function of the government. An efficient review process is essential to ensure the twin goals of reviewing and permitting projects in a timely manner, while also ensuring project plans comply with state and local requirements.

There is mutuality in these goals. Landowners and developers benefit from the orderly development of the County in ways that maintain quality of life, preserve property values, ensure adequate services and infrastructure, and protect public safety. The County organization and community benefit from the economic activity, including tax revenue, job creation, increased housing and expanded services that new development provides.

These goals led to this review, which has evaluated the organizational structure of the Community Development Department; assessed the operating procedures for the development review process, including inspections; identified reasons for delays in turnaround times; and made recommendations for improvement. Management Partners will also develop a plan to assist with implementation, which will be provided under separate cover.

## Approach and Methodology

Management Partners used a variety of analytical and management techniques to conduct this review. Our work began with a kickoff meeting chaired by the County Manager, followed by a review of documents and data provided by County staff to assist us in learning about the steps involved in the development and permitting process.

We used various methods to obtain input and ideas from individuals with experience in the County's development process, which helped to frame concerns and identify areas for improvement. We also identified best practices and conducted benchmarking research to determine areas where operations could be enhanced, and customer service improved. Each major component of our work is described below.

### **Staff and Stakeholder Interviews**

Management Partners conducted interviews with 16 staff members representing County Manager's Office, Community Development, Public Works, Fire, Utilities, and the Flood Commission. The purpose of the interviews was to learn about department operations, as well as understand what is working well and what could be improved. We sought ideas about parts of the review that are problematic and should be improved and processes that should be updated.

To understand the customer perspective, we conducted confidential one-on-one interviews with 12 stakeholders/customers representing a cross-section of building professionals (e.g., engineers, developers, contractors, architects, and planners). In addition to what is working well and what changes they would recommend, customers were asked to assess Doña Ana County's performance on a variety of factors specific to development review operations and functions. These performance ratings are discussed later in this report. All individuals interviewed were assured of confidentiality and only the themes from the interviews are included in this report.

The input from interviews with customers provided a clear sense of concerns and challenges, though it also identified areas in the County's development process that are successful.

## **Customer Survey**

Another activity in our scope of work included a quantitative survey of a broad group of customers. This helped to ensure we heard from a range of businesses, property owners, developers and others with experience in Doña Ana County's development process.

Between April 2 and May 1, 2020 Community Development Department customers were given the opportunity to complete an anonymous survey indicating their satisfaction with various aspects of the development review process. The survey design was developed by Management Partners and was refined following a discussion with Doña Ana County's project team. We used a SurveyMonkey™ platform to conduct the survey and compile the anonymous responses.

On April 2, 2020, the Community Development Director sent a link to the survey to local builder groups and other county contacts. The County Manager also sent a follow up email reminder on April 23, 2020. The survey was open from April 2 through May 1. A total of 42 stakeholders responded to the survey which represents a 56% response rate (75 individuals were invited to take the survey). Management Partners was pleased with the response rate, especially since the national focus during this period was on COVID-19.

The survey scope was broad, probing aspects of the County's process that work well and those that need improvement. It asked specific questions about the number of review cycles customers' experienced; questions about bottlenecks they encounter; questions about the fees charged; and whether upgrades in County technology are warranted.

Respondents were also asked to rank various elements of development review from 1 to 10, with 1 being worst and 10 being best, including the helpfulness of Doña Ana County staff, timeliness, and other specific attributes. Of course, the survey began by asking respondents to provide background on their experience with the development review process, the components of the development review process they have used recently, and how recent their latest communication with development review staff was.

Table 1 shows the breakdown of respondents' roles in the development review process. Nearly half (48%) were general contractors and another third (31%) business owners.



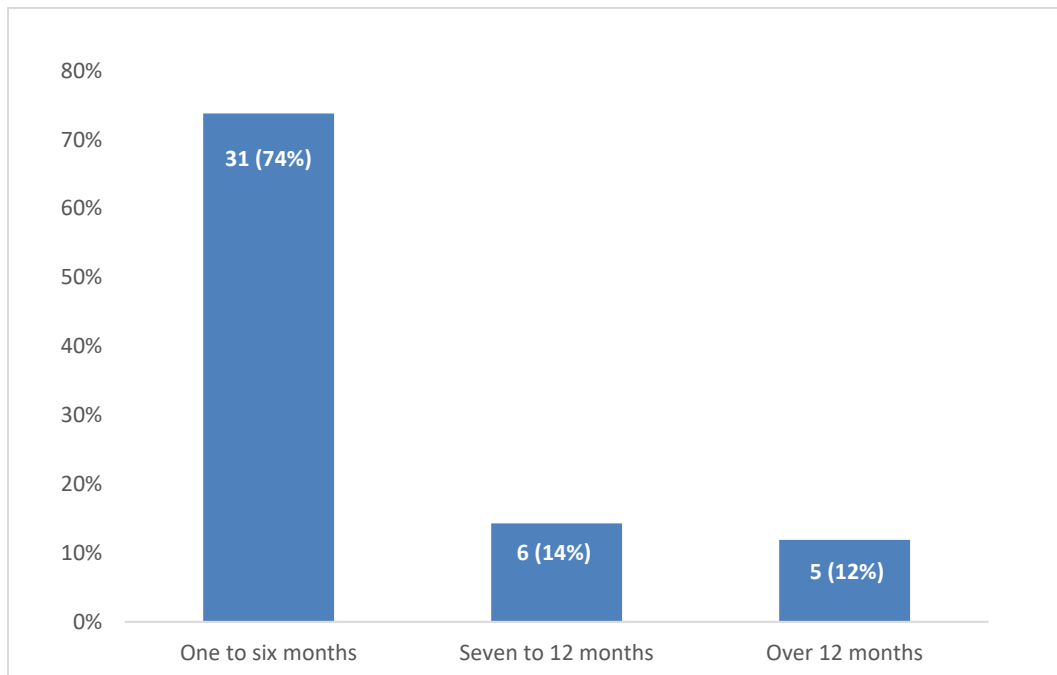
Table 1. Which best describes your role in the development process? (Check all that apply)

Answer Choices	Response
General Contractor	20 (48%)
Business Owner	13 (31%)
Skilled Trades Sub-Contractor	8 (19%)
Architect	5 (12%)
Landowner	4 (10%)
Developer	2 (5%)
Engineer	1 (2%)
Planner	1 (2%)
Other (please specify) <sup>1</sup>	5 (12%)

<sup>1</sup> Other includes two realtors, one lender, one property manager, and one former planning and zoning committee member

Survey respondents were also asked how long ago they concluded their most recent involvement with Doña Ana County for a development review-related purpose. Figure 1 indicates that nearly three-quarters (74%) of the survey respondents were involved with the County development process within six months of completing the survey.

Figure 1. How long ago did you conclude your most recent involvement with Doña Ana County (from application submittal to completion)?



Survey respondents indicated that over the past three years the top areas of the Doña Ana County development process most used were residential

plan review, permitting and inspections (60%) and commercial plan review, permitting and inspections (53%). Smaller but still substantial groups of respondents had worked with the County to process Stormwater Pollution Prevention Plans (SWPPP) and driveway permits, 35% and 28%, respectively.

A SWPPP is required for commercial or industrial construction activity that will disturb more than an acre of land, is part of a subdivision or development plan greater than one acre in size or has a building area greater than 5,000 square feet.

The survey asked customers about the purpose of their recent interactions with the County. Table 2 includes the list and reasons for customer interactions with the County’s development process.

*Table 2. Components of the Doña Ana County development process that you/your company have used in the past three years. (Check all the apply)*

Answer Choices	Response
<b>Residential plan review, permitting and inspections</b>	24 (60%)
<b>Commercial plan review, permitting and inspections</b>	21 (53%)
<b>Stormwater Pollution Prevention Plan</b>	14 (35%)
<b>Driveway permit</b>	11 (28%)
<b>Subdivision platting (preliminary and/or final)</b>	9 (23%)
<b>Zone change</b>	8 (20%)
<b>Industrial plan review, permitting and inspections</b>	7 (18%)
<b>Variance</b>	7 (18%)
<b>Contractor licensing</b>	5 (13%)
<b>Special Use</b>	4 (10%)

Respondents were also asked to rate the Doña Ana County development review process in several areas on a scale of one to ten with one being worst and ten being best. Their responses are shown in Table 3. During Management Partners’ interviews with customers we posed the same question and have incorporated the interview results with the survey results for this question. The results are shown in order of the best average rating to the worst.

Respondents rated the helpfulness of permit counter technicians (6.80), the helpfulness of planning staff (6.34), and the ease of scheduling an inspection (5.98) the highest. On the opposite side, they rated the time it takes to complete reviews (3.93), the building permit process (4.68), and the consistency of review comments (4.75) the lowest.

Table 3. On a scale of 1 to 10 with one being worst and ten being best, how would you rate Doña Ana County's development review process for the following?

Answer Choices	Average Rating
Helpfulness of permit counter technicians	6.80
Helpfulness of planning staff	6.34
Ease of scheduling an inspection	5.98
Helpfulness of plans examiners	5.85
Fees and charges for reviews and permits	5.70
Helpfulness of engineering staff	5.66
Timeliness of inspections	5.60
Building inspection process	5.50
Accessibility of staff	5.38
Codes and requirements are clear and understandable	5.36
Overall experience with Doña Ana County's building permitting process	5.22
Quality of information about process	4.95
Processes and procedures that are easy to understand	4.88
Overall experience with Doña Ana County's development review process (from pre-application to certificate of completion or occupancy)	4.85
Consistency of review comments	4.75
Building permit process	4.68
Time it takes to complete reviews	3.93

Similarly, respondents were also asked to indicate what they believe needs the most improvement in the development review process. As Table 4 shows, 70% of respondents indicated that plan review processing time takes too long. Slightly less than half of the respondents (48%) said coordination among departments needs improvement and 44% think faster inspections are necessary.

Table 4. In your view, what components of the development review process most need improvement? (Check all that apply)

Answer Choices	Number of Responses
Plan review processing time	19 (70%)
Coordination among departments	13 (48%)
Timely inspections after scheduling	12 (44%)
Information provided to applicants at the beginning of the process	11 (41%)

Answer Choices	Number of Responses
Information available on the County website	10 (37%)
Plan review comments received after revisions	9 (33%)
Staff communications	8 (30%)
Inspector consistency	7 (26%)
Staff accessibility	7 (26%)
Pre-application meeting	6 (22%)
Staff knowledge	6 (22%)

Management Partners has summarized other survey results by relevant topic, and they will be presented in later sections of this report. This will help to show the context and illustrate our observations and recommendations.

### Best Practices in Peer Agencies

Compiling relevant best practices was an important part of our analysis. This involved research about and interviews with selected jurisdictions. Management Partners began this research by asking Doña Ana County staff to identify peers based on knowledge of best practices, similar service delivery, and other relevant criteria.

The peer agencies where best practices were researched are shown below.

- Albuquerque, New Mexico
- El Paso, Texas
- King County, Washington
- Phoenix, Arizona
- Scottsdale, Arizona
- Tucson, Arizona

Additionally, we conducted an in-depth interview with staff in the City of El Paso, since stakeholders and others frequently compare its development review functions to those in Doña Ana County.

It is important to acknowledge that every local government organization is unique and detailed comparisons are not always possible. For example, laws and requirements can vary substantially among jurisdictions, and this can complicate efforts to compare them. So, our focus was to examine operations in other jurisdictions (and especially the best practices in use) to identify how the development process in Doña Ana County could be improved. Moreover, this exercise allowed us to document the best practices already in use in Doña Ana County.

Like the results from the stakeholder survey, this report discusses best practices by relevant topic to show context and illustrate our observations and recommendations.

### **Process Workflow Mapping**

Management Partners staff met with department representatives from Community Development, Public Works, Fire and the Flood Commission to document the workflow process steps for preliminary and final subdivisions, and a commercial and a residential development project (from the pre-application to certificate of occupancy and file close out).

The process mapping sessions were interactive, cross-departmental meetings that allowed staff and Management Partners to discuss and develop an understanding of the workflow sequence and identify decision points and process bottlenecks. The process maps depict the current workflow (as-is process) for commercial and residential development applications and also subdivisions.

The process maps also show the role of various people and entities, including the applicant, County agencies and departments and the Board of County Commissioners, as an application moves from pre-application or initial inquiry to intake and review, permitting, inspections and final approvals. The detailed process maps are included in Attachment B.

## Community Development Department Overview

While multiple departments are involved in the development review process, the Community Development Department plays a lead role in coordinating land use and development review processes. The department's mission expresses this role:

*To guide and regulate community growth and development in a manner that protects Doña Ana County's unique character while introducing quality, new development promoting enhanced quality of life, economic development, and distinct communities.*

General responsibilities of the department include community and regional land planning and management, building services, code administration, geographic data maintenance and addressing, economic development and grants coordination.

### **Staffing and Organization Structure**

Staffing in the department consists of a director who oversees operations and staff in four divisions: Advanced Planning, Current Planning, Building Services, and GIS. Additionally, the office of the director includes an administrative assistant.

Table 5 shows a listing of staff and full-time equivalent (FTE) positions. Our understanding is that all positions are filled.

Table 5. Community Development Department Staffing

Division/Title	FTE
<b>Advanced Planning</b>	
Chief Planner	1
Planner-Designer	2

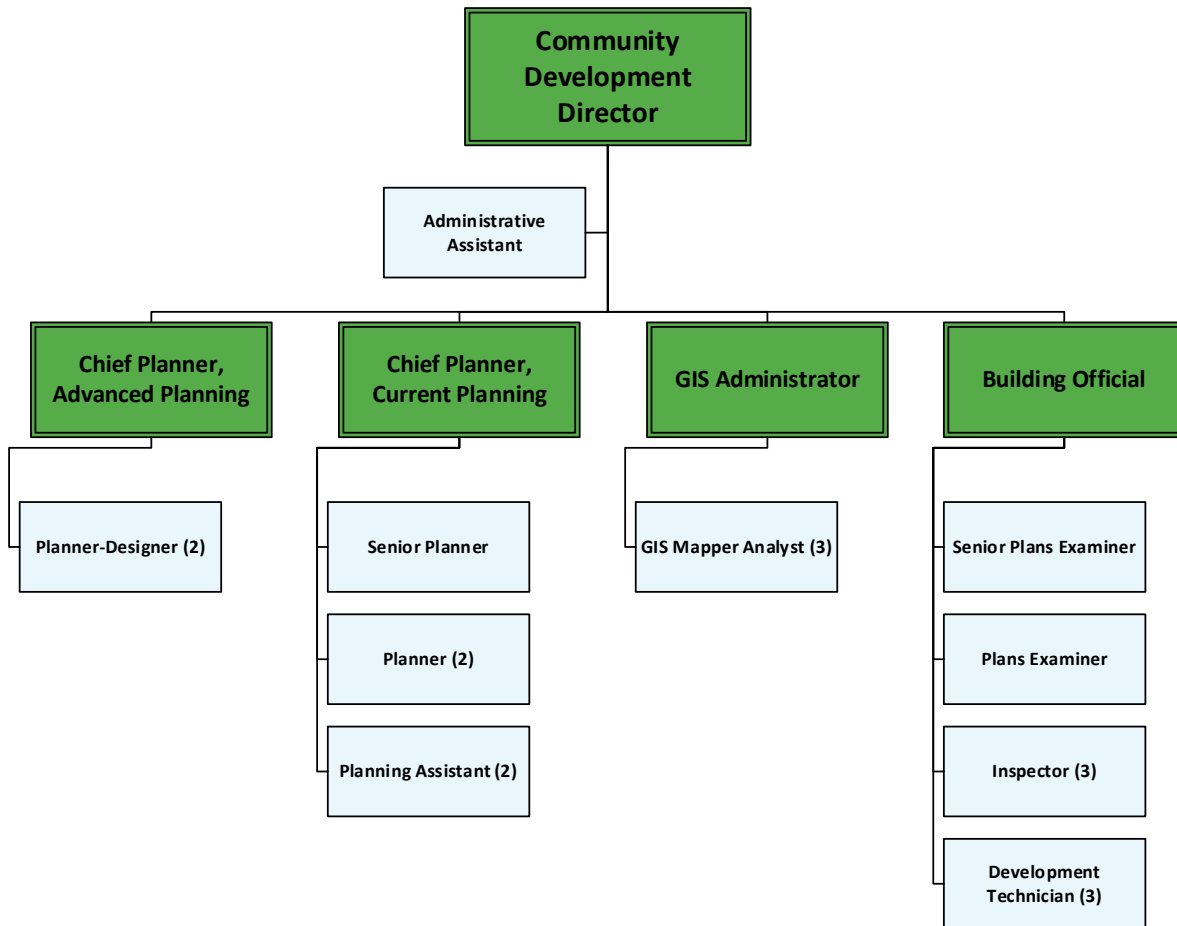
Division/Title	FTE
<b>Current Planning</b>	
Chief Planner	1
Senior Planner	1
Planner	2
Planning Assistant	2
<b>Building Services</b>	
Building Official	1
Senior Plans Examiner	1
Plans Examiner	1
Inspector	3
Development Technician	3
<b>GIS</b>	
GIS Administrator	1
GIS Mapper Analyst	3
<b>Administration</b>	
Director	1
Administrative Assistant	1
<b>TOTAL STAFF</b>	<b>24</b>

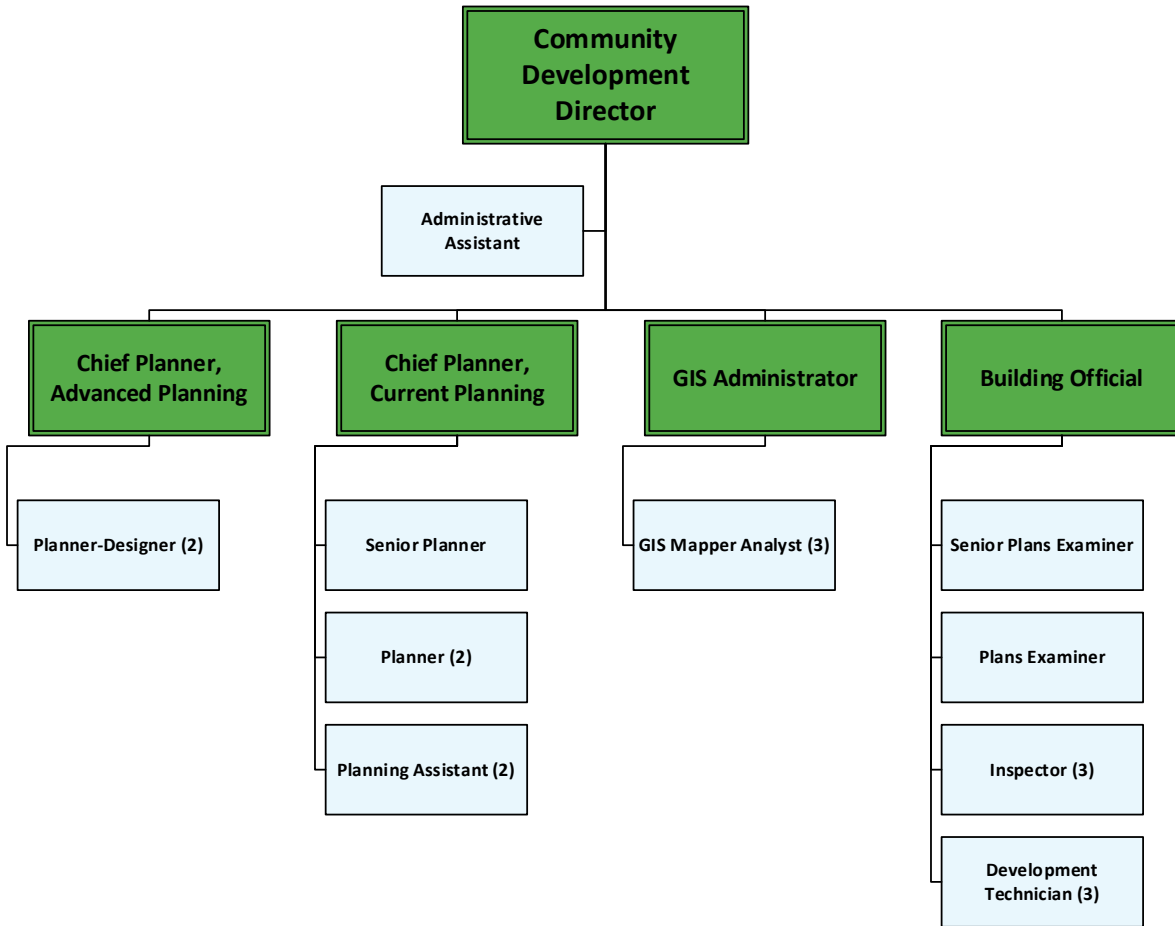
Figure 2 below shows the four divisions and reporting relationships for the Community Development Department.

*Figure 2. Community Development Organization Chart*

---







We were interested to study how the peer jurisdictions align the development services functions and how these compare with Doña Ana County. As shown in Table 6, each of the peer jurisdictions has placed the permitting, plan review, planning and inspections functions in one department. This is also how the functions are placed in Doña Ana County. It is our experience that this arrangement is common because it combines the most directly interrelated functions. We therefore believe this structure should be retained in Doña Ana County.

Table 6. Peer Jurisdiction Development Review, Coordinating Department and Functions

Peer Jurisdiction	Coordinating Department	Divisions/Functions In Coordinating Department
Albuquerque, NM	Planning Department	GIS, Building Safety and Permits, Business Registration, Code Enforcement, Development Review Services, Inspections, Metropolitan Redevelopment, Urban Design and Development
El Paso, TX	Planning and Inspections	Planning and Land Development, Building Permitting, Inspection and Safety, Business Licensing, Special Event Permitting, and Pre-Development Consultation

Peer Jurisdiction	Coordinating Department	Divisions/Functions In Coordinating Department
King County, WA	Department of Local Services, Permitting Division	Permitting, Plan Review, Planning, Inspections, Code Enforcement, Business Licenses
Phoenix, AZ	Planning and Development	Permitting, Plan Review, Planning, Inspections, Zoning
Scottsdale, AZ	Planning and Development Services	Permitting, Plan Review, Planning, Inspections, Code Enforcement
Tucson, AZ	Planning and Development Services	Permitting, Plan Review, Planning, Inspections

### Workload Activity

The workload for building permit and plan review activity during calendar year 2019 is presented in Table 7. These data do not reflect the workload resulting from plan revisions and re-inspections, which can represent a significant portion of the overall workload. Further, the data do not represent the entirety of the County’s development process workload. Of course, having more complete data would give the County better information for making resource and workload decisions.

In addition to the importance of tracking this type of information for workload purposes, the County would benefit from studying these data and working to minimize the number of times plans and projects must be re-reviewed and re-inspected. These and other performance measurement issues will be discussed later in this report.

Table 7. Building Services Workload in 2019

Permit Type	Applications Processed (2019)	Percentage	Monthly Average
Electrical	1,293	40.9%	108
Mechanical	885	28.0%	74
Mobile Home	188	5.9%	16
New SF Residential	170	5.4%	14
Re-Roofs	151	4.8%	13
Residential Additions/Alterations	129	4.1%	11
Rock Walls/Fences	124	3.9%	10
Churches/Accessory/Other	76	2.4%	6
Agricultural/Metal Buildings/Barns	57	1.8%	5

Permit Type	Applications Processed (2019)	Percentage	Monthly Average
<b>Commercial Additions/Alterations</b>	53	1.7%	4
<b>New Commercial</b>	14	0.4%	1
<b>Demolition</b>	13	0.4%	1
<b>Foundations/Grading</b>	8	0.3%	1
<b>TOTALS</b>	<b>3,161</b>	<b>100.0%</b>	
<b>TOTAL PERMIT REVENUE</b>	<b>\$523,969</b>		<b>\$43,664</b>

## Assessment of Development Review Process

### **Overview**

The previous sections presented background information and data about the organization and County's development review process. The following sections provide an assessment of the development process, including Management Partners' observations and recommendations.

The Doña Ana County development review process, as in many other jurisdictions, involves a series of interrelated steps by multiple departments to reach its goals and the goals of its applicants. These review steps are sometimes undertaken sequentially<sup>1</sup> (one step after another) and sometimes concurrently. Of course, concurrent processing, where the various departments review projects at the same time, is more efficient and minimizes delays. This issue will be discussed in more detail later in this report.

A proposed land development in Doña Ana County could involve one or more application reviews, such as:

- Subdivision,
- Zone Change,
- Variance or Conditional Use,
- Site Plan,
- Building Permit,
- Construction Permits (for access, floodplain development or grading/drainage),
- Elevation Certificate,
- Water and Wastewater,
- Thoroughfares,

---

<sup>1</sup> By sequential, we refer to the practice where a set of plans is reviewed by multiple agencies in sequence. For example, a set of plans might first be reviewed by Utilities. After they are finished, the plans would be transferred to Building Services for review.

- Fire Protection, and/or
- Other state or locally required permit.

### ***Applicant Perspective***

Development applicants and customers, whether they have worked in the County for years, have only processed a few applications, or are submitting their first development application generally have the same questions:

- What do I need to prepare and submit for approval?
- How long will the process take (from initial application submittal to completion)?
- How much will it cost and what are the specific fees required during the development review process?

During the customer survey, Doña Ana County stakeholders said that coordination of the overall development review process needs improvement. In fact, only 40% of respondents agree/strongly agree that the overall review process is well coordinated between departments.

### ***Availability of Information***

Providing clear and current information about the County’s regulations, requirements, procedures and fees is fundamental to maintaining an effective development review process. Doña Ana County provides extensive information online about various aspects of the development review process; however, it is spread across several departments’ web pages, making the information difficult to access. We asked stakeholders whether this information is adequate and, with the exception of information about fees, heard it is lacking.

As shown in Table 8, more than half of survey respondents disagreed or strongly disagreed with statements about the usefulness of Doña Ana County’s information. The yellow-highlighted cells in the table indicate responses above 50%.

*Table 8. Survey Respondent’s Views on the Adequacy of Development Review Materials and Website Information*

Statements	Strongly Agree	Agree	Disagree	Strongly Disagree
	Strongly Agree/ Agree		Disagree/ Strongly Disagree	
	1 (3%)	13 (45%)	9 (31%)	6 (21%)

Statements	Strongly Agree	Agree	Disagree	Strongly Disagree
	Strongly Agree/ Agree		Disagree/ Strongly Disagree	
The county’s materials allow me to be informed about the requirements for preparing and submitting building and infrastructure plans for review by the County.	14 (48%)		15 (52%)	
The county’s materials allow me to be informed about application and document requirements.	1 (3%)	14 (44%)	11 (34%)	6 (19%)
	15 (47%)		17 (53%)	
The county’s materials allow me to be informed about application and permitting fees.	2 (6%)	19 (59%)	7 (22%)	4 (13%)
	21 (66%)		11 (34%)	
Information provided on the website about the development review process meets my needs.	1 (4%)	10 (37%)	9 (33%)	7 (26%)
	11 (41%)		16 (59%)	

In addition to information they receive during the pre-application meeting, members of the development community, homeowners and others often refer to the County website about submittal and document requirements, application and permitting fees, and the various phases of the development process, from pre-application to completion.

Of course, the traditional way jurisdictions have provided this information is by creating a comprehensive system of handouts. This remains one of most important ways to document and communicate information about a jurisdiction’s development process. Maintaining this information online has become a necessity. In fact, the handouts should generally be prepared with intent of posting them on the County’s webpages.

Management Partners reviewed the County’s website and found it includes significant information. But, as we noted previously, the information is spread across various departments’ websites and this makes it less user-friendly. Customers should not be forced to piece together information, forms and requirements. These silos of information make it hard for customers to feel confident that they have all the correct information. It is a best practice to consolidate land use and development information on a dedicated web portal that can be reached from department and agency websites. Management Partners has compiled a list of websites in Attachment C that exemplify these best practices.

**Recommendation 1. Create a land-use and development portal that includes general information, regulations, fees, forms, frequently asked questions, process diagrams, and related information.**

## ***Pre-Application***

Pre-application is one of the first official steps of the development review process. It involves holding a pre-application meeting whose goal is to provide guidance to a prospective applicant about development- or project-specific requirements needed to obtain approval for a land use activity. The pre-application step is designed to give applicants an opportunity to make business decisions about whether to proceed with a project and, if so, provide a roadmap for doing so.

Our research for this engagement (and our general experience) showed that pre-application review is a best practice used in each of the peer agencies. Therefore, we were pleased to see that Doña Ana County has already implemented pre-application reviews. However, there are a few areas where adjustments and refinements could improve the pre-application process to be more useful, as discussed below.

### **Incomplete Submittals**

We heard consistently from staff that the quality and completeness of submittals are sometimes inadequate. By “submittals” we refer to all the applications, plans, reports and related information an applicant provides to the County. These submittals can occur at various times in the development process, e.g., during pre-submittal, entitlement application, and plan review phases of review. It is vital that the information provided to the County is complete and accurate, and that best efforts have been made by applicants to ensure the proposed projects comply with the County’s requirements.

Management Partners has found that incomplete submittals are a common problem in many jurisdictions’ development review processes. We have seen what happens when applicants provide incomplete or ambiguous details about their projects. This makes it much harder (and sometimes impossible) for staff to provide meaningful comments and input. Worse, when this happens, applicants are often beset by confusion and projects are delayed.

The lack of complete submittals can also stymie efforts to improve efficiency of the review systems. The result is multiple review cycles that would have been unnecessary if the submittal had been complete.

For these reasons, Doña Ana County should undertake efforts, in a partnership with landowners/developers, to ensure that submittals at each step in the process are complete and comply with the regulations.



**Recommendation 2. Develop comprehensive submittal guidelines for all types of applications and projects to ensure completeness and compliance with County regulations.**

**Recommendation 3. Ensure the submittal guidelines are shared with stakeholders, published on the County's website, and detailed in handouts.**

In addition to the pre-application meeting, some project applications would benefit from an additional meeting with County staff to ensure the required plans and documents are complete. This may be especially useful for larger, more complex projects and will help to avoid delays as the initial plan review is started.

**Recommendation 4. Determine when an application review meeting should occur to ensure application completeness.**

### **Pre-Application Meeting Preparation and Attendance**

In Doña Ana County, pre-application meetings are scheduled by Community Development staff, usually a planner, who will determine and notify other staff who should attend. The determination of who should attend depends on the type of project (residential, commercial or industrial) and which department representatives would have a role in reviewing the project. Typically, the meeting notice will include project or proposal details and other information such as zoning for the site and other background. As noted above, ensuring the quality and accuracy of this submittal information is essential.

During interviews, we heard that staff attendance at these meetings can be inconsistent due to scheduling or other commitments. We also heard that staff members sometimes do not review an applicant's proposal prior to the meeting. In other words, they come to the meeting unprepared. This can defeat the purpose of the pre-application step, which is to provide meaningful comments during the meeting. Further, customers told us that pre-application meetings in Doña Ana County sometimes focus too much on discussing the process and not enough on project details and the issues the project could encounter.

**Recommendation 5. Ensure that a representative from departments involved in the review process attend pre-application meetings.**

**Recommendation 6. Send copies of the complete submittal packets to department representatives at least 5 days in advance of the meeting to facilitate a discussion with the applicant during the pre-application meeting.**

The meeting chair should ensure the meeting discussion focuses on the project's merits and potential issues it may encounter.

**Recommendation 7. Provide a contact list of pre-application meeting representatives (County staff) to the applicant during the meeting.**

### **Fees for Pre-Application Review**

Pre-application meetings in Doña Ana County are required for most projects and are offered at no cost to prospective applicants. Our experience is that some cities and counties charge a fee for pre-application review. As an example, pre-application meetings in the City of El Paso are mandatory for projects that require Planning Commission review, and the city charges a fee for pre-application meetings to recover the City's costs.

Other agencies, including Doña Ana County, provide this review step at no cost as a way of encouraging applicants to participate early in the process. Since this initial review helps to improve submittals and address issues early in the process, it can make the County's review more efficient. Moreover, this approach is popular with customers because they see it as a way to get an early start on the review process.

Pre-application review is a clear best practice and we believe the County's current system (where a no-cost pre-application review is required for most projects) is appropriate and should not be changed.

### **Pre-Application Meeting Follow Up**

While businesses, contractors, design professionals or other individuals can receive a wealth of information at the pre-application meeting, County staff has not always prepared a record of the meeting. Such a record is a useful reference to guide applicants. Similarly, without a clear record of the meeting, key staff comments and/or project requirements may be missed or forgotten. Maintaining a meeting record improves continuity in the County's review process.

During our research with peer jurisdictions, we were impressed with El Paso's follow up practice, in which notes taken during pre-application

meetings are input into the city's land management system (Accela). The comments are then accessible to staff and applicant through its web portal.

**Recommendation 8. Develop a written record of pre-application meeting comments that is distributed to prospective applicants and property owners and made part of the project file.**

### ***Application Intake and Determining Completeness***

After pre-application, intake of the formal application occurs at the customer service counter in the Community Development Department. The counter is staffed with three development technicians. These positions have a wide range of responsibilities, including taking in applications, accepting fees, answering phone calls, and logging applications and plans into the department's land management system (iWorQ) for tracking.

The development technician is responsible for determining if a project also requires a driveway access permit, Stormwater Pollution Prevention Plan or another specialized permit at application intake. These staff members also take care of routing plans to staff in all the various County departments or agencies.

Development technicians are often tasked with determining if an application is complete. We understand they sometimes accept incomplete submittals based on an applicant's promise to forward the outstanding information. Though we understand the staff's motivation, Management Partners is not convinced that accepting an incomplete submittal is a good practice.

Development technicians use a completeness checklist to assist them in determining if an application is complete or incomplete, and this is a best practice. But the checklist they use is a generic form that applies to many types of applications and lacks details specific to individual applications.

**Recommendation 9. Create separate checklists for different types of applications to ensure a more detailed and consistent review of projects.**

### **Online Submittal Alternative**

The Doña Ana County Government Center may not be easily accessible to all customers given the County's expanse, where dropping off plans or submittals can require a long drive. In fact, several development

customers complained about the need to physically visit Doña Ana County offices to transact business.

Giving applicants an alternative way of accessing information and submitting applications could save them time and improve the efficiency of the County's review process. As previously mentioned, the recent COVID-19 pandemic has also forced changes to the way services are provided.

Providing greater opportunities for customers to transact business online could improve both convenience and efficiency. This should be relatively straightforward for many types of submittals (especially for minor projects and applications). Accepting applications and plans for larger projects will require the County to develop protocols for electronic plan review, and this will take longer to implement due to the complexity of such systems.

**Recommendation 10. Modify high volume services (e.g., payments, forms, and applications) so they can be accessed, completed and submitted using online platforms and remote access.**

**Recommendation 11. Analyze alternatives and develop protocols for accepting complex projects and plans electronically.**

## ***Review of Entitlements***

Some projects require an initial subdivision or planning approval (entitlement) before building plans can be submitted and reviewed and permits can be issued. Further, a number of these approvals may also require a public hearing(s).

The entitlement process can vary substantially because the required approvals are based on the scope of the proposed project. For example, a tract of new homes would involve subdividing the property. Similarly, changing a property's zoning from industrial to a commercial use requires a rezoning approval. Of course, projects that do not propose such actions can often proceed directly to building plan review and this helps to shorten the overall development review timeframe.

County staff estimates that a preliminary subdivision review could take 30 to 45 days, followed by a final subdivision plat which is typically completed in another 30 days. A review of a special use permit, zone change, or variance request could take up to 45 days (without a public

hearing). If a public hearing is required, the timeframe would increase by an additional 21 days.

Based on our experience, these entitlement timeframes are not excessive. In fact, the entitlement phase in many jurisdictions can stretch out for several months or even years in places that have highly regulated land use controls. However, it is essential that public agencies inform prospective applicants of the estimated time the entitlement review process is likely to take (from initial application to final approvals and project completion). This helps applicants understand the process and better equips them in making the important business decisions they may encounter.

Of course, it is difficult for public agencies to provide reliable time estimates unless they have effective performance measurement capabilities, including the related data on which to base the estimates. Compiling this level of detailed information is not practicable without a land management system, except in the smallest of organizations (much smaller than Doña Ana County).

Such a system provides the detailed data and reporting capabilities to assist staff in determining the average cycle time for various review processes (i.e., how long certain types of projects take to complete). Doña Ana County uses iWorQ for its land management system. This system provides basic functionality but has limitations, as will be discussed later in this report.

**Recommendation 12. Provide cycle time estimates, by review process type, on the County website and in applicable handouts.**

**Recommendation 13. Use performance indicators and data tracking to set estimates and monitor performance.**

### ***Routing of Plans***

The County has a manual process for routing plan submittals to the departments for review, including revisions to plans. For instance, as the applications and paper plans are submitted, they are logged into iWorQ system and then physically placed in department-specific boxes in the Community Development file room for pick-up by the departments.

Although the 30-day review clock begins when an application is submitted at the counter, it may be one or more days before a department representative picks up the plans. It can take a similar amount of time when the plans are returned to the Community Development intake area

for the applicant to pick up. As this illustrates, the cumulative time for routing can be considerable. This is a common bottleneck we see when assessing development review processes in jurisdictions.

Unfortunately, these routing delays can be compounded in situations where a set of plans must also be manually routed from one reviewer to the next in a sequential review. Routing delays need to be minimized or eliminated wherever possible. In fact, routing timing is one of many performance measures that should be monitored regularly.

Ideally, the County will upgrade its technology to allow for electronic plan submittal and review (e-plan review). An additional advantage of allowing electronic submittals is that routing to the various departments and returning plans with comments is instantaneous. This would eliminate routing delays and provide greater efficiency for the County and its customers.

We expect e-plan review to be commonplace in public agencies in the coming years. In other words, it is not a question of *if* but *when* Doña Ana County will move in this direction.

In the interim, the development review process would benefit from establishing a protocol for how plans are to be routed and returned. For example, plans should be routed to departments within one business day after submittal. To be clear, this means the plans would be sent to and received by the departments within one day. A protocol such as this will help to reduce overall delays.

**Recommendation 14. Establish a protocol for routing of plans to and from departments to minimize delays in the review process.**

### ***Sequential and Concurrent Review of Plans***

The process for routing plans is further complicated due to the sequential review of some commercial plans. For instance, four sets of plans are submitted with commercial applications and they are routed as follows:

- Fire, Engineering and Landscaping each receive a plan set, which allows a concurrent review.
- Flood Commission, Planning, Addressing, Utilities and Building share a plan set and add comments one after the other in a sequential fashion.

Sequential review processes are sometimes created to reduce the number of plans applicants must submit, given that extra sets of plans are costly. But this can become a tradeoff (i.e. the added cost of plans versus the cost

of project delay). In Doña Ana County, the sequential review is to ensure projects comply with zoning and flood requirements before proceeding with the review of building plans. According to County staff, it is rare that zoning or flood requirements stop projects, in part because these issues are identified and addressing during the pre-application review process. So, sequential review in Doña Ana County has few benefits but can increase the review timeframes.

Concurrent review is a best practice used in jurisdictions to ensure efficiency. Indeed, every peer agency we researched for this engagement performs concurrent plan reviews for most development applications.

Improved processes and technology upgrades will be needed to move from sequential to concurrent plan review. This will require the cooperation of all reviewing departments and agencies, and especially the staff who review projects for zoning and flood compliance. Fortunately, moving to a concurrent review process will also eliminate the sequential routing of plans, which can add to the delay.

**Recommendation 15. Institute concurrent review of projects by all departments and agencies.**

### ***Building Plans***

Once an application is submitted and accepted as complete it is routed for review based on whether it is a residential or commercial application. For residential applications, staff in four functional areas review the plans, as follow.

- Flood Commission,
- Planning,
- Utilities, and
- Building.

For commercial applications, staff in eight functional areas review the plans:

- Flood Commission,
- Planning,
- Addressing,
- Landscaping,
- Engineering
- Utilities,
- Fire, and
- Building.

### Timeliness of Reviewing Building Plans

We learned during interviews that the timeliness of reviewing plans was a major source of frustration for customers. So, as we designed the survey to gauge the feedback from a broader group of customers, we focused on timeliness of review. We asked if the County, or specific departments, do a good job at providing timely reviews.

As shown in Table 9, the top three areas where respondents were positive about the County’s process, and where staff do a good job and provide timely reviews, are as follow.

- Addressing (83% of respondents)
- Flood Commission (79% of respondents)
- Landscaping (77% of respondents)

However, a high percentage of survey respondents for these three areas said they “don’t know.” The “don’t know” response for Addressing, Flood Commission, and Landscaping was 44%, 41% and 59%, respectively. In other words, while the responses about these three areas were positive, a substantial number of customers did not answer the question.

The survey made clear that customers have significant concerns about review timeframes in key areas. For instance, 69% of respondents said the County does not provide timely reviews overall. When asked about specific areas where timeliness is a problem, respondents had the most concerns in two areas.

- Building Services (58% of respondents)
- Engineering Division (72% of respondents)

Additionally, a majority (75%) of survey respondents disagreed/strongly disagreed that plans are reviewed according to an established timeframe.

Table 9. Levels of Agreement with Plans Review, Comments and Timely Feedback

Statements	Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
	Strongly Agree/Agree		Disagree/Strongly Disagree		
County staff do a good job reviewing my building plans and providing timely feedback.	1 (4%)	7 (27%)	10 (38%)	8 (31%)	5 (16%)
	8 (31%)		18 (69%)		
Plans are reviewed according to an established timeframe.	1 (4%)	6 (21%)	12 (43%)	9 (32%)	4 (13%)
	7 (25%)		21 (75%)		
	1 (3%)	14 (45%)	11 (36%)	5 (16%)	1(3%)



Statements	Strongly Agree	Agree	Disagree	Strongly Disagree	Don't Know
	Strongly Agree/Agree		Disagree/Strongly Disagree		
Comments from County staff about building and infrastructure plans are clear.	15 (48%)		16 (52%)		
Flood Commission staff do a good job reviewing development plans and providing timely feedback.	4 (21%)	11 (58%)	1 (5%)	3 (16%)	13 (41%)
	15 (79%)		4 (21%)		
Planning Division staff do a good job reviewing development plans and providing timely feedback.	2 (9%)	11 (48%)	7 (30%)	3 (13%)	9 (28%)
	13 (57%)		10 (43%)		
Addressing staff do a good job reviewing development plans and providing timely feedback.	0 (0%)	15 (83%)	1 (6%)	2 (11%)	14 (44%)
	15 (83%)		3 (17%)		
Landscaping staff do a good job reviewing development plans and providing timely feedback.	0 (0%)	10 (77%)	1 (8%)	2 (15%)	19 (59%)
	10 (77%)		3 (23%)		
Utilities Division staff do a good job reviewing development plans and providing timely feedback.	1 (6%)	9 (57%)	5 (31%)	1 (6%)	16 (50%)
	10 (63%)		6 (38%)		
Building Services staff do a good job reviewing development plans and providing timely feedback.	3 (11%)	8 (31%)	8 (31%)	7 (27%)	6 (19%)
	11 (42%)		15 (58%)		
Engineering Division staff do a good job reviewing development plans and providing timely feedback.	1 (6%)	4 (22%)	8 (44%)	5 (28%)	11 (38%)
	5 (28%)		13 (72%)		

### Process for Reviewing Building Plans

Prior to our survey of customers, the County Building Official (CBO) was the only staff person conducting building plan review for residential and commercial permit applications. Based on data provided by the Community Development Department for 2019 (shown in Table 7) this would include at least 367 sets of plans. The recent hiring of two dedicated plans examiners will allow the CBO to devote additional time to management functions of the Building Services Division.

It is our understanding that Doña Ana County established a 30-day target for reviewing plans. We refer to this as the “cycle time.” The County uses this same cycle time for the initial and all subsequent submittals. In other words, if a set of plans undergoes two cycles of review before it is approved, approximately 60 days will have elapsed. Or, if it takes three

plan review cycles before approval, then the elapsed time would be 90 days. Of course, this assumes the department reviews are completed within the 30-day target timeframes for each review cycle. The number of review cycles is another essential performance measure that should be monitored regularly.

Our experience is that a 30-day review cycle is at the upper end of an acceptable turnaround timeframe for the initial review. In fact, there are numerous agencies whose targets range from 10 to 21 days for the first cycle of review.

Some customers asked during our interviews why the County uses the same 30-day target for each cycle of review. Customers said they are accustomed in other jurisdictions to having a shorter review timeframe after the first review cycle. Management Partners shares this view. The best practice is to accelerate the review of resubmitted plans, since staff conducted a thorough review during the initial review. Our experience is that a turnaround of five to ten days is usually workable.

We also find in many jurisdictions that achieving these levels of performance can require adding resources (staff, technology), instituting rigorous performance measurement and committing to long term improvements. We believe these should be among the goals in Doña Ana County.

Interestingly, our research showed that the City of El Paso has a five-day turnaround for residential plan reviews and a seven-day turnaround for commercial plan reviews. Performance measurement in El Paso shows the five-day turnaround target is met in 92% of the residential projects and in 88% of the commercial projects.

While El Paso's data are impressive, we hesitate to suggest their applicability for Doña Ana County, at least for now. Further improvements may become possible through the County's efforts for continuous improvement. Moreover, we note, that timeliness must always be balanced with the need for quality and completeness in the review process. We are confident that Doña Ana County can improve the timeliness of its review, as discussed above, while maintaining such a balance.

**Recommendation 16. Establish a 10- to 21-day target for the first cycle of plan review.**

**Recommendation 17. Establish a five- to ten-day target for the second and subsequent cycles of review.**

Additionally, El Paso's Chief Plans Examiner sends a weekly report to each department with a role in reviewing plans to show how long each project has been in review. This type of report is helpful in identifying delays with individual projects and those that might need special attention.

A weekly report would also provide managers in the various departments an ongoing measure of their performance. In fact, this would be one component of the management system to help the County track the overall performance of its development review process. A further discussion of performance measurement issues appears later in this report.

**Recommendation 18. Develop a weekly report of active cases that includes the number of days plans have been in the queue, sorted by reviewing department or agency.**

### **Staffing**

Improving internal systems and removing bottlenecks will result in important benefits to the development review process. However, there are three key areas (a fourth area in the Fire Department is addressed later in this report) where the bottlenecks or service deficiencies may be related to inadequate staffing:

- Building plan review,
- Engineering review, and
- Building inspection.

***Building plan review.*** As noted previously, the CBO was the only person reviewing building plans until recently, when two additional plans examiners were hired. This had been a concern for customers because the limited staffing resulted in longer timeframes to review plans. As noted above, however, the County has since hired one plans examiner and one senior plans examiner. We believe these two additional positions will reduce delays substantially, though measuring the turnaround times to confirm this will be essential.

If a review of data over the next several months continues to show a deficiency in meeting the turnaround time targets, the County may need to hire an additional plans examiner on a full- or part-time basis. Alternately an engineering consultant could be engaged to provide additional capacity when the workload peaks.

***Engineering plan review.*** A remaining bottleneck exists in engineering, where one engineer is responsible for a wide variety of duties. These duties include plan review, but we understand the position has other

collateral responsibilities unrelated to the development process. We understand this engineer is assisted by an intern (and a second intern was to be hired), but this may still be insufficient to handle the workload.

Since engineering staff do not use iWorQ, data regarding workload was not available. So, it is not possible to confirm the staffing needs. But, according to customer feedback, this is an area where significant bottlenecks occur. Hiring a second engineer may be necessary. Also, the goal for engineering review should be to collaborate with applicants and work to solve problems. This was a major concern during our interviews with customers.

***Building inspection.*** Building inspection is another well-known bottleneck, according to both staff and customers. This issue will be discussed in more detail later in this report. However, it is clear that the County needs to add inspection capacity. Of course, adding capacity can be done by hiring more specialty inspectors (i.e., electrical inspectors, plumbing inspectors, building inspectors). This is the County's current model. A better approach would be to expand training and certification of employees so they could perform multiple inspections during a site visit. This approach will be discussed further in a section discussing combination inspection later in this report.

The best method to assess inspection capacity is to measure the percent of inspections which are conducted within the target timeframes. We suggest using a goal of >85% because this is the point at which service levels will be highly predictable for customers. If inspectors are not able to reach this goal using normal practices and conducting thorough inspections, it would be an indication that more inspectors are necessary. Ensuring a high level of predictability for customers should be the goal for this (and every) step in the development process.

Of course, the geographic expanse of Doña Ana County contributes to the inspection capacity challenges. In a later section of this report, we discuss two potential innovations for conducting certain types of inspections. However, these innovations will require the County to work with state officials, who must sanction the practices.

In summary, adding staff resources in key areas is sometime necessary when process improvements and effective customer service levels are not achievable through streamlining alone. The best approach to address the funding for potential staffing increases is through a fee study and an analysis of the fully burdened costs of providing an appropriate level of development review services. These fee and cost recovery issues are also explored in more detail in a later section of this report.

**Recommendation 19. Conduct a staffing analysis related to the key bottleneck areas in the development review process to determine whether additional positions are warranted.**

### **Development Review Committee**

A common best practice used during the early stages of the development review process (after pre-application) involves convening an internal committee of representatives from the various reviewing departments to coordinate the review, collaborate about requirements and conditions, and resolve internal conflicts that could result in confusion for applicants.

Jurisdictions sometimes call this group collaboration the development review committee (DRC), or something similar. DRC review is most common for reviewing larger, complex projects that require entitlements or other complex approvals to move forward. Since it can be labor intensive, the DRC process is not typically warranted or necessary for smaller projects.

Like many other best practices, Doña Ana County has already implemented a DRC process. However, we believe there are ways it could be refined, as discussed below.

- ***Establishing a schedule and deadlines.*** One of the most effective ways of improving the DRC process is to create a regular schedule and deadlines for meetings. Doña Ana County has such a schedule and deadlines, but they are not always adhered to. The temptation to schedule DRC review on an ad hoc basis or to permit flexible deadlines should be avoided. Staff and customers both benefit from the structure and predictability of a schedule and setting deadlines helps to convey a sense of urgency and emphasize the need for accountability.
- ***Requiring full participation by departments.*** Inconsistent attendance at DRC meetings undermines the value of collaboration. While every staff member is faced with competing priorities and workload, their role in the DRC is essential to ensure the success of the development review process. This typically requires that a reviewer from each department attends the DRC meeting, and that each attendee has already completed a review of the project plans. This prior review of the project plans is essential, and not doing so can thwart an efficient and productive discussion in the DRC meeting.
- ***Documenting comments resulting from the DRC meeting.*** A chair should be designated for DRC meetings and this person should be

responsible for ensuring that comments discussed during the meeting are summarized in writing. This summary should be made part of the project file and a copy provided to the applicant.

Additionally, we have found that providing a duplicate copy of the meeting summary to the property owner helps to avoid circumstances where they do not receive this information from their architect, engineer or other representative. Doña Ana County already prepares a meeting summary. We understand this summary is provided to the representative attending the meeting, and it is also kept in the project file. Sending a copy to the property owner would improve this best practice.

- ***Inviting the applicant to attend DRC meetings.*** Staff are often more comfortable when the DRC is an internal, staff-only process. This allows staff to discuss ideas and express concerns openly. However, many of our clients have begun inviting applicants and property owners to attend the DRC meeting and the results can be impressive. We understand that applicants are already invited to DRC meetings in Doña Ana County. Including property owners in this meeting would complement this best practice.

The entire development review process is a problem-solving exercise to determine whether a project complies with regulations and, if not, how it can best be revised to comply. Engaging the applicant in this problem-solving exercise can be a powerful way to avoid confusion and focus on solutions. In many cases this helps speed the overall project review and reduce the need for extra cycles of review.

**Recommendation 20. Establish a schedule and firm deadlines for DRC meetings.**

**Recommendation 21. Enact an administrative policy requiring full participation by reviewing departments in the development review process.**

**Recommendation 22. Prepare a written summary of DRC comments for each project, place it in the project file and provide a copy to the applicant.**

**Recommendation 23. Invite each applicant and property owner to attend the portion of the DRC meeting when their project is to be discussed.**

### **Process for Compiling Comments on Plans**

As reviews are conducted by the various departments in Doña Ana County, the goal is to upload the departments' comments into the iWorQ system. However, some reviewers also email their individual comments to the applicant. Other departments email their comments to the development technicians in Building Services. Development technicians will then email the review comments to the applicant. These practices are inconsistent and should be normalized. Inconsistency in a review process should be avoided because it adds complexity, makes data gathering and measuring performance difficult and presents more opportunities for mistakes and mishaps.

After receiving comments on the plans from a reviewer some applicants begin to revise their plans and resubmit them with changes. Sometimes the revised plans are submitted to the County prior to receiving comments from each of the reviewing departments. Unfortunately, comments yet to be received from one reviewing agency may affect how the plans need to be revised. This can result in an applicant revising their plans over and over again.

Applicants often resort to this practice of piecemeal revisions when the overall development review process is disjointed, and they receive comments on their plans in an uncoordinated fashion. The County's data does not indicate how frequently this happens, but our sense from talking with stakeholders is that it is an ongoing issue.

The solution to these problems is to improve the County's process and practices so the review of plans is faster and better coordinated. Also, we were interested to find that the City of El Paso does not allow applicants to resubmit corrected plans until they receive comments from all the reviewing departments. Although this is also the policy in Doña Ana County, revised plans sometimes slip through and are routed to the departments prematurely.

A related best practice is to have one staff member compile the comments from the various reviewing departments and send them as a comprehensive package to the applicant. This would give applicants a complete picture of the various comments at one time and discourage the practice of piecemeal revisions. Further, many organizations designate certain staff members as "project managers," which is a role often used for this purpose. We discuss the concept of project managers and make further recommendations about this practice later in this report.

**Recommendation 24. Establish procedures to ensure revised plans are not accepted for processing before all**

**departments and agencies have completed their review of the prior plan sets.**

**Recommendation 25. Designate a staff member (or project manager) to compile comments from the various reviewing departments and send them to the applicant in one complete package.**

## ***Inspections***

Once a building permit is issued in Doña Ana County, requests for inspections may be submitted online. Also, during the first quarter of 2020, the County Building Official implemented a change to the inspections process that requires the builder/contractor to have a set of the approved plans on site. Previously, inspectors would take the office copy out to the site, and this would occasionally result in misplaced plans. This change implemented by the CBO is a best practice and is commonly used in other jurisdictions.

Another recent improvement for inspections is the use of updated computer tablets which allows inspectors to enter inspection results while in the field, as well as print and email the inspection comments while in the field.

### **Inspection Requests**

Prior to the COVID-19 pandemic, development technicians prepared a list of inspection requests that they then forwarded to inspectors. This allows the inspectors to review project files in the office before going into the field. Again, these are common best practices and should be continued.

However, recent changes in Doña Ana County now require inspection requests to be made online, instead of by telephone. This change was made to improve efficiency and not take staff away from serving customers at the counter, routing plans, and performing other permitting duties. Encouraging customers to use online systems is a best practice because it allows staff to focus on enhancing other services.

**Recommendation 26. Develop materials and protocols that facilitate contractor and applicant use of online systems to request inspections.**

### **Combination Inspections**

Doña Ana County's inspectors are specialized by the area of the building trades for which they have certifications. New Mexico law requires inspectors to have certifications in their area of inspection expertise.



The result of the current process is that a project under construction may require a visit by multiple inspectors e.g., an electrical inspector, a plumbing inspector and others. There could also be required inspections for complex mechanical equipment or a building's structural work. These separate inspections can be inefficient and delay the overall construction process as contractors have to schedule and wait for their scheduled inspections to occur.

It is more efficient and common to see agencies conducting combination inspections by staff who are certified to inspect multiple aspects of a project and can do so in one visit. In addition to being more efficient, this is more convenient for the customer because it allows them to schedule fewer inspections. However, these types of combination inspections in Doña Ana County have been constrained because inspectors do not have the multiple certifications that are required.

Our understanding is that the Community Development Department has been working to address this issue, which will involve additional training, certification and, potentially, recruitment for inspectors.

**Recommendation 27. Develop protocols for conducting combination inspections, including training and hiring new staff as necessary.**

### **Virtual Inspections**

As discussed previously, customers told us that scheduling field inspections can be a bottleneck. This is partially due to the lack of combination inspections and partially due to the limited number of inspectors the County has. While customers generally gave inspectors high marks for being helpful, they note that delays in the inspection process are an ongoing problem.

Management Partners understands some of the staffing problems relate to the need to fill vacancies and provide employee training and certification. Additionally, the travel time for inspectors as they drive through the County's expansive geography contribute to this problem. But it is clear that adding inspection capacity is key.

Though unrelated to adding inspection capacity, the efforts to suppress the spread of COVID-19 has led some public agencies to test other ways of conducting inspections so they can maintain service levels during the pandemic. One solution, virtual inspections, has been used to bridge this service level gap while ensuring physical distancing and protecting the health of public employees. We believe this innovation could help Doña Ana County with inspections for some minor projects.

In a relevant example, a former Management Partners' client implemented a virtual inspection process in response to the pandemic. The photo below shows a building inspector in Anaheim, California, conducting a virtual inspection of a construction project.



In this process, the contractor provides a real-time virtual tour of the construction project using the video camera from a mobile phone or tablet. The inspector is then able to ask questions, direct the contractor to show certain construction details using the camera, and discuss any corrections the contractor may need to make.

Management Partners previously discussed this option with the Community Development Department staff, and we understand that initial efforts for a similar pilot program in Doña Ana County have been considered. However, the County staff received an initial response from the New Mexico Construction Industries Division (CID) indicating they are not receptive to this approach except in limited circumstances. Further dialogue with state officials may help to identify innovations that can be used for limited types of projects to ensure continuity of services.

### **Self-Certification**

Another best practice that has emerged in recent years is to allow for certain limited projects to be self-certified by the contractor doing the work. The most common types of self-certification projects are related to minor residential improvements, such as water heater change-outs, patio cover construction, or certain types of heating and air conditioning projects.

The key in allowing self-certifications is for the agency to prepare written standards and diagrams to illustrate the requirements. Contractors obtain a permit by certifying they will comply with the requirements, and then they document compliance by providing the agency with photographs of the completed work. Realistically, only a small subset of projects will qualify for such a self-certification. But creating a simpler process for those projects that qualify would enhance services for those customers and free inspectors to assist other customers with more complex projects. This would also require conversations with state CID officials to seek their approval.

**Recommendation 28. Establish a dialogue with the New Mexico Construction Industries Division to determine if there are protocols under which virtual inspections or self-certifications for specified permit types could be acceptable.**

## Other Development Review Issues

### ***Fire Department Review***

Our review of the development review process focused on all the various departments and agencies involved in reviewing and commenting on plans and projects. However, we took particular interest in the way the Fire Department's review is involved in this system.

### **Staffing and Workload**

The Fire Prevention Division of the Doña Ana County Fire Department is currently staffed with 2.0 FTE captains who perform plan reviews, new construction inspections, life safety inspections on existing business occupancies, fire safety public education, and fire investigations (analysis of cause and origin of fires). The Fire Chief also assists with problem solving and community/developer relations. The Fire Department is in the process of transferring annual business occupancy life safety inspections to the fire engine crews to assist with and better balance the current workload.

Within the Fire Department's jurisdiction, there are an estimated 3,800 active businesses, although 1,350 of those are home occupations. This leaves approximately 2,450 inspectable commercial and industrial occupancies. In recent years, the number of yearly inspections performed by the department has averaged between 250 and 450, including re-inspections.

### **Challenges**

Based on our interviews with staff (including the Fire Chief), the department has unique challenges in the development review process from the fire prevention perspective. One of the challenges relates to the reuse of existing buildings which sometimes result in a change of occupancy classification. When this occurs, the various fire and building codes can require additional fire safety modifications to the building. This often creates frustration for applicants and puts them at odds with staff, who are simply following the adopted codes to protect public safety.

Greater participation in the pre-application process and the DRC will help the department to ensure these issues are surfaced early in the process. Further, improving handouts and other requirements will give applicants more upfront information and ensure they are not surprised later in the process.

**Recommendation 29. Revise the protocols for pre-application and DRC meetings to ensure the Fire Department is included.**

**Recommendation 30. Prepare updated handouts and informational materials regarding fire and life safety requirements and distribute these materials early in the development review process.**

A second challenge relates to the timeliness and coordination of reviews. The County's review process results in silos of review by departments instead of collaboration. As mentioned previously, applicants are often frustrated when this segmented project feedback is provided because it appears the County is repeatedly giving them negative comments or telling them to revise their plans.

A third challenge relates to the lack of cost recovery. For instance, there are no fees to offset the costs of the Fire Department's plan review or field inspection services. This is unusual, in our experience, because the costs for the Fire Department's review of development projects are being absorbed or subsidized elsewhere in the County's budget. As will be discussed later in this report, a comprehensive fee study that includes fire prevention is necessary. This would help to fund fire prevention services and improve customer service. More importantly, ensuring a quality review by the Fire Department would help to protect public safety in Doña Ana County.

### **Alternative Service Delivery Options**

Many law enforcement and fire organizations are reassessing the use of sworn personnel for duties that can be performed by civilian employees. This not only can result in cost savings but can help to return sworn personnel to areas that demand their expertise, skill and ability. This could be especially important in Doña Ana County given the Fire Department's limited staffing and the expansive service area it covers.

Management Partners has seen other successful models for providing these fire prevention services, which may warrant consideration in Doña Ana County. These models could include:

- Using a third-party contractor to perform fire code plan review and inspection services, which would be funded by new cost recovery-based fees;
- Transferring the fire code plan review responsibilities to an expanded Building Services Division; or
- Contracting for fire prevention services from another public agency, such as the City of Las Cruces.

**Recommendation 31. Assess the feasibility of alternative service delivery options for providing fire prevention services.**

### ***Use of Checklists***

The goals of the development review process are to confirm that projects comply with County requirements and ensure fairness and good service. Of course, fulfilling these goals requires a thorough and consistent review of development projects. The same requirements must be applied consistently to avoid circumstances where one applicant is required to do something that is not required of another applicant. Standardizing the review process through the use of checklists is, in our experience, one of the most straightforward but effective ways of accomplishing these goals. We understand some departments and agencies in Doña Ana County use a type of checklist, but this practice is not universal and, thus, it represents an area for improvement.

While checklists are primarily intended for staff to improve consistency in the review process, we urge the County to consider using checklists as a public handout as well. This can improve transparency in the review process and help to ensure accountability.

**Recommendation 32. Develop a list of topics for which checklists would be useful.**

**Recommendation 33. Delegate the creation of each checklist to an individual staff member having expertise in the functional area.**

**Recommendation 34. Edit and publish the completed checklists as handouts and post them on the County's website.**

### ***Review of Minor Projects***

Maximizing the review and permitting of small projects over the counter is a best practice found in jurisdictions having some of the most effective development review systems. Over-the-counter processing is an

important practice because it speeds up the review for small projects and ensures they are not competing with larger, more complex projects that require detailed review by plans examiners and other staff in the back office. Reviewing small projects at the counter is also more efficient because it minimizes the administrative duties associated with tracking, routing, recordkeeping and similar tasks.

As an example, the intake staff in the City of El Paso have been cross trained to perform over-the-counter reviews of small projects, such as rock walls and curb cuts, so an applicant can obtain the permit in one visit. The City's plan review staff are also available to assist the intake staff when necessary.

Additionally, residential projects less than 400 square feet are reviewed the same-day in El Paso's "one-stop shop." Again, these best practices divert minor projects from the plan review queue and provide applicants with quick turnaround on small projects and permits.

Expanding over-the-counter reviews in Doña Ana County would enhance customer service and improve efficiency in the County's review process. Doing so would entail identifying the qualifying projects, allocating staff, and providing ample training.

**Recommendation 35. Identify a range of projects that can be reasonably reviewed and processed at the counter.**

This typically involves projects of a minor nature than can be reviewed and permitted within about 15 minutes.

**Recommendation 36. Allocate sufficient staffing to the counter to expand over-the-counter reviews.** This probably means adding half of an FTE or one FTE.

**Recommendation 37. Provide cross training for all development technicians to expand over-the-counter reviews.** Cross training for development technicians can usually be provided by the Building Official or plans examiners, though providing external training could further expand their capabilities.

Another variation of over-the-counter review that can be successful is to hire a part-time plans examiner (or consultant) who keeps regular hours at the counter. This position would review small- to mid-size projects that are beyond the skill level of development technicians. Again, reviewing projects at the counter minimizes the number of projects that must be submitted into the County's formal plan review process. It thereby allows all projects to move forward more quickly.

**Recommendation 38. Evaluate alternatives for expanding services over the counter by hiring a part-time plans examiner or consultant.**

## ***Technology***

As mentioned previously, Doña Ana County presently uses iWorQ software as its land management system (LMS), which is one of many such software packages used by public agencies. Before discussing this further, it may be useful to describe what an LMS is and how it is used.

A land management system is a software tool used by public agencies to comprehensively track the development process, including the status of each project under review. By compiling this myriad of data, an LMS also provides the information necessary for effective performance measurement and for compiling clear facts about the development process. To summarize, the primary uses of LMS software include the following:

- Monitor the overall development process to evaluate efficiency and effectiveness, and to assess workload;
- Track the status of individual projects to avoid delays and to keep customers apprised during the review process;
- Provide detailed data and reports that enable the agency to make process improvements as well as measure performance; and
- Improve accountability by providing elected officials, department managers, customers and members of public with fact-based analysis about how well the development process works.

## **System Functionality**

While Doña Ana County uses an LMS, our review showed that the iWorQ system does not result in comprehensive project tracking or efficient performance management. For instance, we noted that the Community Development Department uses a separate, standalone Excel spreadsheet to track the performance of the permit review and issuance process. Further, other departments do not use iWorQ, or they use it inconsistently. In fact, other departments also use separate software solutions to track their part of the development review process.

So, while the County collects significant data about the development process, it is stored in multiple systems which are managed by multiple departments. This makes thorough project tracking and performance measurement impractical. Consequently, as it is configured and used, the County's land management system is less than ideal.



### **Inconsistent Use of Technology**

As noted above inconsistency is one of key challenges in the County's use of technology. The inconsistent use of iWorQ, or use of separate software systems, results in gaps or piecemeal collection of data available for tracking the development process. Consequently, the County does not have a single system that provides a comprehensive picture of the development process or the status of individual projects.

We learned that some departments, including Utilities, Fire and Engineering, do not use iWorQ because they either do not have access to the module or because they use a separate system to track their portion of the project review process. As a further example, we understand that subdivision applications are logged and tracked in iWorQ but comments are instead sent by email.

Our experience is that organizations often use parallel systems, as is happening in Doña Ana County, for a workaround because the land management system's functionality is inadequate, staff do not have access to the system, or there is a lack of training. This frequently results in silos of information which hampers efforts to improve the development process because data are not easily accessible. This also makes internal communication about projects more difficult and it stymies effective communication with the County's customers.

We have seen the effects of inconsistent technology in other jurisdictions. Unfortunately, it is usually associated with problems in the development review process and poor customer service outcomes. In fact, one common trait among organizations with highly effective development review systems is the way they use technology and the data it provides to improve their operations and the services to customers.

Improvements to the development process in Doña Ana County, therefore, will require changes to how technology is used and managed so that departments and County leaders have reliable, comprehensive data. The first step, of course, is to understand the County's technology needs. The County should strive toward having one system that provides full functionality and which will help unify the County's development review process.

### **Training**

Some of the technology problems relate to a need for training to create reports in the iWorQ system. Solving this problem would be a beneficial interim step until a more robust technology solution can be considered. However, we do not believe that training alone can overcome the

problems associated with data gaps related to parallel systems or the inconsistent use of iWorQ by the departments.

### **Future Technology Investments**

We learned during discussions with staff that the County is considering an iWorQ upgrade that would allow customers to track their project status online. This is a common feature in most modern land management systems. While providing customers with more information is always useful, we are concerned it would not provide them with complete project status because only some County departments upload data to iWorQ. In other words, this solution will not address the underlying issue that all County departments are not using the same technology system as they review plans and process projects.

### **Technology Upgrades in Other Public Agencies**

While a technology review of the County's iWorQ system was outside our scope of work, Management Partners conducted a brief survey of other jurisdictions that are also grappling with these technology upgrade issues, as shown in Attachment D. This helped to illustrate that these types of technology challenges are common, and that many jurisdictions are making technology investments to improve their development processes.

The cost of technology upgrades varies widely depending on the needs of the jurisdiction, the software vendor and other factors. To illustrate this variation, we looked at the costs of a new LMS (EnerGov by Tyler Technologies) in two cities in Southern California. The basic LMS component in Fullerton (population 139,000) cost about \$185,000 while it cost about \$1.3 million in Newport Beach (population 85,000). Both cities had incurred other costs as well, such as those related to data conversion and assistance with system implementation.

Many jurisdictions have been successful in assessing their LMS needs and controlling the cost of upgrades by hiring a specialized IT consultant with experience improving functionality and upgrading land management software. This is especially helpful in the procurement process as jurisdictions evaluate the numerous software choices that are available. Further, technology upgrades can be costly and have long-term implications for the organization. So, obtaining assistance from experts in the field is a prudent way to conduct a needs assessment and make technology decisions that achieve a jurisdiction's objectives and avoid unintended costs. Management Partners believes Doña Ana County would benefit from these best practices.

**Recommendation 39. Prepare a request for qualifications (RFQ) to engage a specialized IT consultant for a needs assessment of technology used in the County's development review process, make recommendations about solutions, and assist the County with implementation.**

**Recommendation 40. Establish protocols to ensure future technology is used consistently by all departments and agencies involved in the County's development review process.**

**Recommendation 41. Provide training for development technicians and other Community Development staff on the reporting capabilities of the iWorQ system.**

### ***Expedited Plan Review***

An additional best practice implemented by Albuquerque, El Paso, Phoenix and Scottsdale is to offer expedited plan reviews for an additional fee. Expedited plan review assists customers whose scheduling or other circumstances necessitate faster processing. Of course, when the plan review turnaround times are operating at an optimum speed, expedited reviews tend to be unnecessary. However, expedited plan reviews could be an important tool in helping customers with unique scheduling challenges and promoting economic development in the County.

Expedited plan review works by adding staff capacity. The most common ways of doing this are to offer overtime to staff to review plans in the evening or during weekends, or to hire part-time or contract (consultant) employees to conduct the plan reviews. It is typical that the additional fees charged for this service are calculated to fully recover an agency's costs.

The critical factor in implementing expedited reviews is to avoid simply moving a project to the front of the line. Letting projects "cut in line" would quickly reverberate throughout the rest of the plan review process. It would be unpopular with other customers, whose projects would be delayed in order to handle the customer who pays a premium fee. Expanding the workload capacity as described above easily avoids this problem.

**Recommendation 42. Implement an expedited plan review process, where additional fees are used to recover**

**the cost of paying overtime or using part-time or contract employees.**

### ***Project Managers***

The concept of designating project managers was introduced earlier in this report. It is a best practice used in Albuquerque, El Paso, Phoenix, and Scottsdale where the jurisdiction designates a project manager to serve as the central point of contact for the applicant. The primary benefit of the project manager approach is in redefining the role of staff in the development review process from being regulators to serving as facilitators.

The project manager role is intended to guide each project through the development review process from beginning to end. For example, the project manager can help answer questions and resolve issues that may affect the schedule for project review and inspections. This approach leads to improved application management and better communication with customers, which helps to expedite the review process. A key role for the project manager is to flag a project's problems early and to work with staff and applicants to keep things moving forward.

The City of El Paso has several staff members serving as project managers, and this is a common practice among agencies who use this system. Our experience is that agencies usually establish guidelines for when to assign project managers. For example, assigning a project manager for a small project may be unnecessary but it could be very helpful for large, complex projects that involve entitlement applications, plan review, and related services.

It is common that jurisdictions rely on planners to serve in the project manager role. However, a plans examiner might serve as the project manager for large projects that involve mostly plan review and inspections.

**Recommendation 43. Establish guidelines for when a project manager will be assigned to help coordinate the project review.**

**Recommendation 44. Identify the tasks a project manager is responsible for and provide commensurate training.**

**Recommendation 45. Identify one or more staff in Community Development that can serve in the project manager role.**

## ***Development Processing Fees***

An assessment of the County's development fees was outside our scope of work, however, our cursory review raised concerns that the fees may not be sufficient to recover the County's costs for providing development services. This is important because, in our experience, most agencies use development fee revenue to ensure staffing and resources are adequate to provide effective service levels.

As discussed earlier, we learned that the County charges no fees for Fire Department reviews performed during the development review process. This practice is inconsistent since fees are charged for reviews performed by most of the other County departments. In fact, this is a common and best practice in many (if not most) public agencies.

We also heard during the interviews with staff that development fees have not been updated comprehensively for some time. We understand it is common for the County to adopt fees based on benchmarking data (i.e., setting Doña Ana County fees based on data from other jurisdictions). We have concerns with using a benchmarking approach for setting development processing fees, as will be discussed below.

### **Cost Recovery**

Maintaining up-to-date development fees is a best practice because it ensures that the cost of providing development services is not subsidized by taxpayers, unless such a subsidy is explicitly authorized by the elected body. For example, some jurisdictions choose to subsidize the processing costs for projects they deem to be in the community's best interest, like childcare centers and senior housing. But they require other projects, such as shopping centers, industrial complexes, and housing tracts, be cost neutral. In other words, they do not shift the costs for processing development projects to other portions of a government's budget. Cost neutrality is the ideal when establishing user fees.

For these reasons, maintaining an understanding of the fully burdened costs of providing development review services is an important practice. This is the best and most justifiable basis for determining fees. It is also a way to ensure effective service levels because fees can be adjusted to cover the cost of providing the staff, technology and other resources necessary to serve customers.

While the County staff could conduct an analysis of its fully burdened costs, we typically recommend clients hire experts for this purpose because this type of analysis is complex. It is easy to overlook entire categories or instances of indirect costs and doing so could underestimate

the County’s full costs of providing development review services. There are numerous consultants with expertise in this subject area and we have found this approach is usually quite successful.

**Support from Development Community**

Cities and counties are sometimes reticent to reconsider their development fees because they are concerned about a lack of support from property owners, businesses, developers and others. We believe including these stakeholders in any process to reconsider the fees is important. Their ideas and input will, together with a comprehensive report prepared by fee experts, help to ensure the County’s approach is balanced and successful.

However, our experience is that stakeholders in most jurisdictions are quick to understand the relationship between fees and faster service levels. Generally, the cost of development fees pales in comparison to the added cost of delays, confusion and poor service. Though no one wants to pay higher fees, most stakeholders will consent if it results in demonstrably better and faster service levels because they understand that time is the ultimate cost.

**Stakeholder Feedback**

To reinforce the previous points, the stakeholder survey showed the vast majority (90%) of respondents see a connection between the quality of the review process (staffing, service levels, timeframes) and the amount of the development fees. As shown in Table 10, only 10% of respondents would not support a fee adjustment to provide supplemental staffing or other resources to improve development review service levels. Half of the respondents said their support would depend on the service improvements provided by the fee adjustment.

*Table 10. Would you support a fee adjustment in Doña Ana County if the fees were used to provide supplemental staffing or other resources to improve development review service levels?*

Answer Choices	Response
Yes	12 (40%)
Depends on the service improvements	15 (50%)
No	3 (10%)

Similarly, a significant number of respondents (87%) see a connection between service levels and upgraded technology, as shown in Table 11. In fact, only 13% of respondents would not support increased fees to cover technology enhancement. This feedback is vital given the need to invest

in technology to support improvements in the development process because it could provide a revenue stream to offset the costs for upgrades.

Table 11. Would you support an additional technology fee in Doña Ana County if the fee was used to upgrade existing technology resources to improve development review service levels?

Answer Choices	Response
Yes	17 (57%)
Depends on the service improvements	9 (30%)
No	4 (13%)

**Recommendation 46. Establish a cost recovery policy to determine which fee categories, if any, are to be subsidized and, if so, the percentage of subsidy.**

**Recommendation 47. Conduct a cost recovery analysis to determine the fully burdened costs for providing an acceptable level development review services and recommend revised fees.**

### **Performance Measurement**

A performance measurement system can help County policymakers, executives, department directors, managers and supervisors assess if programs or services are obtaining the desired and/or expected results.

Performance measures are designed to systematically collect data about a program’s efficiency and effectiveness. When used correctly they are a tool for managing and improving performance over time. The use of performance measures is also a best practice for assessing staffing levels, workload and promoting continuous improvement.

Doña Ana County’s development review process does use some measures to track performance. However, these measures could be improved by establishing a more comprehensive system of performance measurement. This would involve tracking additional data points, which would provide the County greater insights and details about the development process.

Performance measures are typically structured in three categories, each of which is important:

- **Outcome/Effectiveness Measures** show how well a program accomplishes its intended purpose. They include quality, cycle time and customer satisfaction indicators. Outcome measures are especially important in gauging customer services and understanding the results of various service areas.

- *Efficiency Measures* show how well resources are being used. They include cost-per-unit indicators as well as productivity measures.
- *Workload Measures* focus on outputs by providing a count of activities or work produced.

As discussed earlier, the primary concerns of most applicants focus on the cumulative time required to complete their project. A comprehensive performance management system would enable County staff to provide clear estimates for customers. This would be vital given that the adopted Doña Ana County FY 2019-20 budget includes a Community Development Department goal to “Streamline building and development review processes for better efficiency and reduced review times.”

Further, the Unified Development Code (UDC) and the UDC Operations Manual includes a table of review times for types of permits. It would be useful for the development review process to have a similar table since review times are a primary measure of the workflow. Another important area of performance would involve tracking the number of review cycles of each review by type. As discussed earlier, reducing the number of cycles of reviews is an important way of streamlining the overall process.

Effective performance measures can be used to inform decision-making and sustain efforts to improve operations, workflow and service delivery. Additionally, performance measures help communicate results to residents, the development community, elected officials, employees and others interested in the work of Doña Ana County. A list of sample performance measures is included as Attachment E.

**Recommendation 48. Identify a family of performance measures for key elements of the development review process (i.e., intake, plans review, inspections, and overall review times) and track them.**

**Recommendation 49. Prepare and issue a monthly report of key measures for internal review to identify delays in workflow, aggregate review times, and the overall change in workload and performance.**



## Conclusion

Doña Ana County's development review process has evolved over a number of years and we found it to incorporate a number of best practices. In fact, the basic structure of the review process should be maintained as is.

However, there are a number of key areas where the County's practices and performance are hampered by constraints in staffing, challenges with communication and internal coordination, a need for improved management systems (such as performance measurement), a need for more transparency and better communication with customers, and improvements in technology.

While these challenges have affected customer service outcomes by adding delays and confusion, stakeholders consistently told us the County's employees and their can-do attitude are among its greatest strengths. The 49 recommendations in this report will help to bolster services in critical areas and refocus the development process as a successful partnership with County stakeholders.

## Attachment A – List of Recommendations

- Recommendation 1.** Create a land-use and development portal that includes general information, regulations, fees, forms, frequently asked questions, process diagrams, and related information.
- Recommendation 2.** Develop comprehensive submittal guidelines for all types of applications and projects to ensure completeness and compliance with County regulations.
- Recommendation 3.** Ensure the submittal guidelines are shared with stakeholders, published on the County’s website, and detailed in handouts.
- Recommendation 4.** Determine when an application review meeting should occur to ensure application completeness.
- Recommendation 5.** Ensure that a representative from departments involved in the review process attend pre-application meetings.
- Recommendation 6.** Send copies of the complete submittal packets to department representatives at least 5 days in advance of the meeting to facilitate a discussion with the applicant during the pre-application meeting.
- Recommendation 7.** Provide a contact list of pre-application meeting representatives (County staff) to the applicant during the meeting.
- Recommendation 8.** Develop a written record of pre-application meeting comments that is distributed to prospective applicants and property owners and made part of the project file.
- Recommendation 9.** Create separate checklists for different types of applications to ensure a more detailed and consistent review of projects.
- Recommendation 10.** Modify high volume services (e.g., payments, forms, and applications) so they can be accessed, completed and submitted using online platforms and remote access.
- Recommendation 11.** Analyze alternatives and develop protocols for accepting complex projects and plans electronically.
- Recommendation 12.** Provide cycle time estimates, by review process type, on the County website and in applicable handouts.
- Recommendation 13.** Use performance indicators and data tracking to set estimates and monitor performance.
- Recommendation 14.** Establish a protocol for routing of plans to and from departments to minimize delays in the review process.
- Recommendation 15.** Institute concurrent review of projects by all departments and agencies.
- Recommendation 16.** Establish a 10- to 21-day target for the first cycle of plan review.
- Recommendation 17.** Establish a five- to ten-day target for the second and subsequent cycles of review.

- Recommendation 18.** Develop a weekly report of active cases that includes the number of days plans have been in the queue, sorted by reviewing department or agency.
- Recommendation 19.** Conduct a staffing analysis related to the key bottleneck areas in the development review process to determine whether additional positions are warranted.
- Recommendation 20.** Establish a schedule and firm deadlines for DRC meetings.
- Recommendation 21.** Enact an administrative policy requiring full participation by reviewing departments in the development review process.
- Recommendation 22.** Prepare a written summary of DRC comments for each project, place it in the project file and provide a copy to the applicant.
- Recommendation 23.** Invite each applicant and property owner to attend the portion of the DRC meeting when their project is to be discussed.
- Recommendation 24.** Establish procedures to ensure revised plans are not accepted for processing before all departments and agencies have completed their review of the prior plan sets.
- Recommendation 25.** Designate a staff member (or project manager) to compile comments from the various reviewing departments and send them to the applicant in one complete package.
- Recommendation 26.** Develop materials and protocols that facilitate contractor and applicant use of online systems to request inspections.
- Recommendation 27.** Develop protocols for conducting combination inspections, including training and hiring new staff as necessary.
- Recommendation 28.** Establish a dialogue with the New Mexico Construction Industries Division to determine if there are protocols under which virtual inspections or self-certifications for specified permit types could be acceptable.
- Recommendation 29.** Revise the protocols for pre-application and DRC meetings to ensure the Fire Department is included.
- Recommendation 30.** Prepare updated handouts and informational materials regarding fire and life safety requirements and distribute these materials early in the development review process.
- Recommendation 31.** Assess the feasibility of alternative service delivery options for providing fire prevention services.
- Recommendation 32.** Develop a list of topics for which checklists would be useful.
- Recommendation 33.** Delegate the creation of each checklist to an individual staff member having expertise in the functional area.
- Recommendation 34.** Edit and publish the completed checklists as handouts and post them on the County's website.
- Recommendation 35.** Identify a range of projects that can be reasonably reviewed and processed at the counter.

**Recommendation 36.** Allocate sufficient staffing to the counter to expand over-the-counter reviews.

**Recommendation 37.** Provide cross training for all development technicians to expand over-the-counter reviews.

**Recommendation 38.** Evaluate alternatives for expanding services over the counter by hiring a part-time plans examiner or consultant.

**Recommendation 39.** Prepare a request for qualifications (RFQ) to engage a specialized IT consultant for a needs assessment of technology used in the County's development review process, make recommendations about solutions, and assist the County with implementation.

**Recommendation 40.** Establish protocols to ensure future technology is used consistently by all departments and agencies involved in the County's development review process.

**Recommendation 41.** Provide training for development technicians and other Community Development staff on the reporting capabilities of the iWorQ system.

**Recommendation 42.** Implement an expedited plan review process, where additional fees are used to recover the cost of paying overtime or using part-time or contract employees.

**Recommendation 43.** Establish guidelines for when a project manager will be assigned to help coordinate the project review.

**Recommendation 44.** Identify the tasks a project manager is responsible for and provide commensurate training.

**Recommendation 45.** Identify one or more staff in Community Development that can serve in the project manager role.

**Recommendation 46.** Establish a cost recovery policy to determine which fee categories, if any, are to be subsidized and, if so, the percentage of subsidy.

**Recommendation 47.** Conduct a cost recovery analysis to determine the fully burdened costs for providing an acceptable level development review services and recommend revised fees.

**Recommendation 48.** Identify a family of performance measures for key elements of the development review process (i.e., intake, plans review, inspections, and overall review times) and track them.

**Recommendation 49.** Prepare and issue a monthly report of key measures for internal review to identify delays in workflow, aggregate review times, and the overall change in workload and performance.

# Attachment B – Process Maps

Residential Construction Permit Process (Map 1 – Page 1 of 4)

Intake

Applicant

Start process

Tell development tech what the project is

Development Tech

Check address to ensure development is in the county and provide informational forms to the applicant.

Inform applicant they need to check with the Flood Commission to see if an elevation certificate is needed

Flood Commission

Inform applicant they will need to complete three elevation certificate forms before obtaining certificate of occupancy

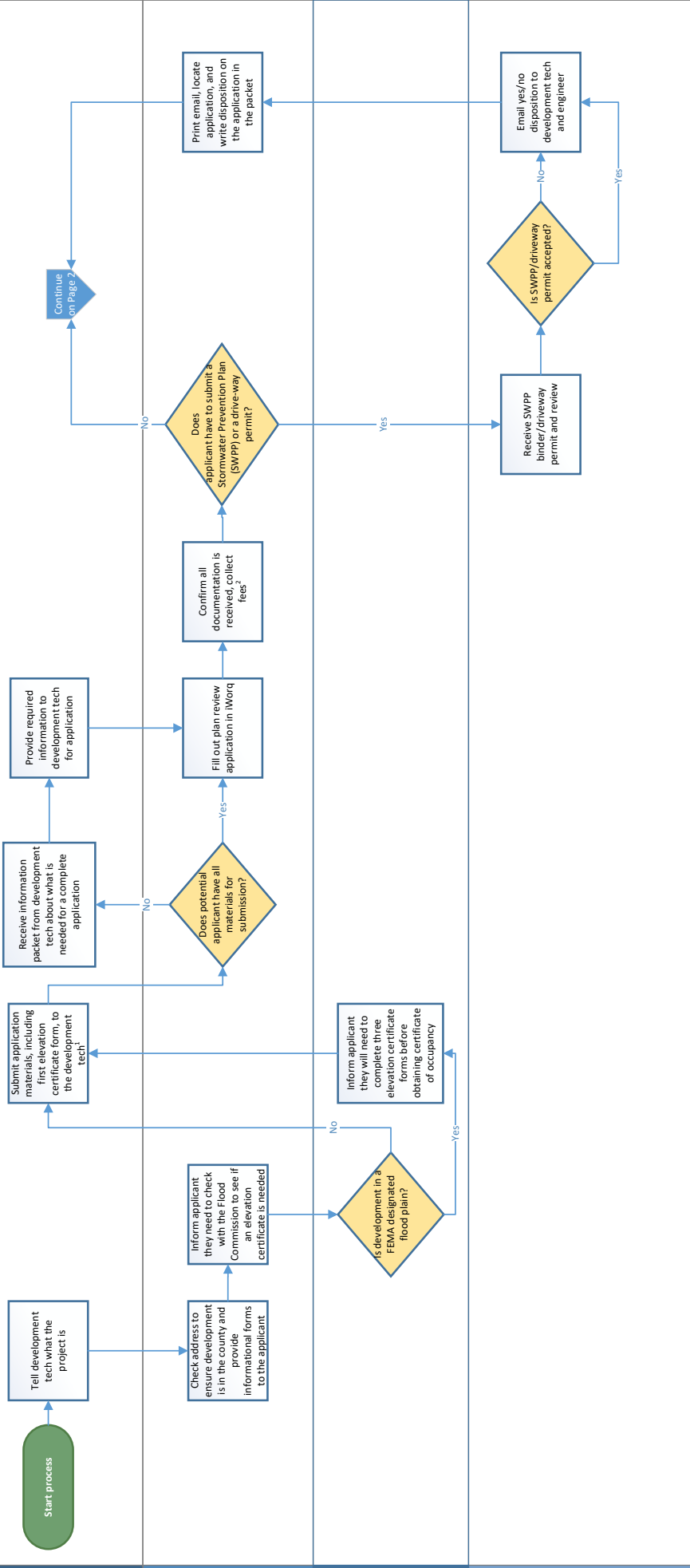
Engineering

Receive SWPP binder/driveway permit and review

Is SWPP/driveway permit accepted?

Print email, locate application, and write disposition on the application in the packet

Continue on Page 2

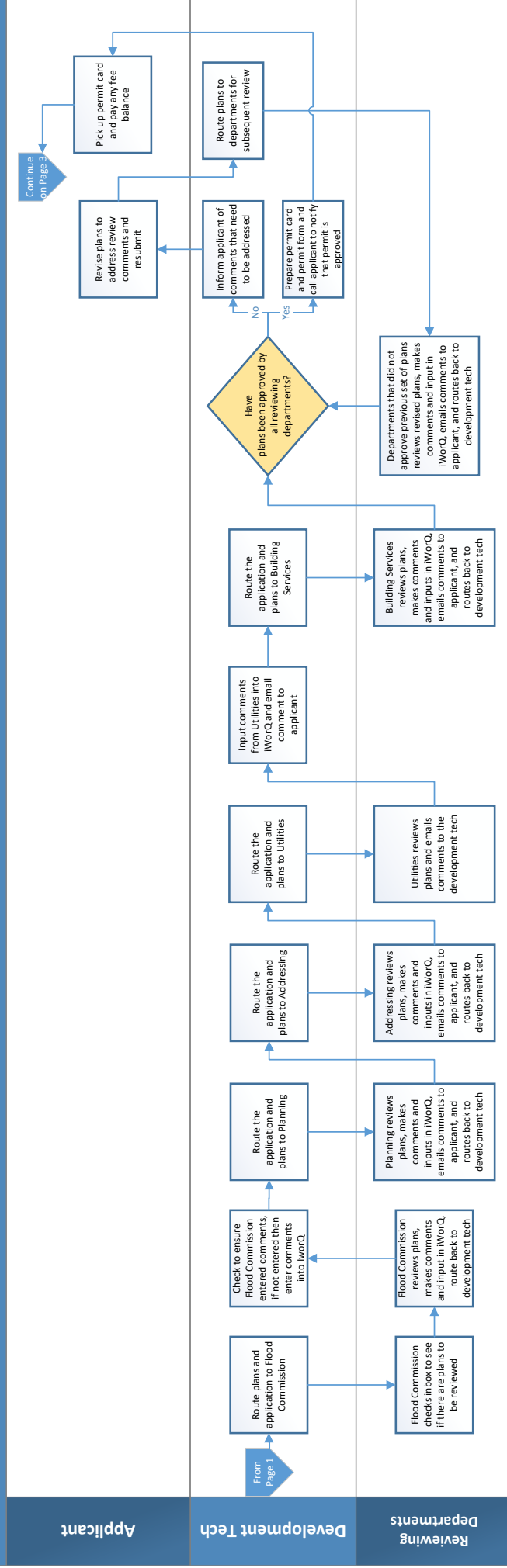


Notes

1. Applicant submits three sets of plans.
2. The applicant is given the choice to pay either 25% or the full amount up front.

Residential Permit Process (Map 1 – Page 2 of 4)

Plans Review and Routing



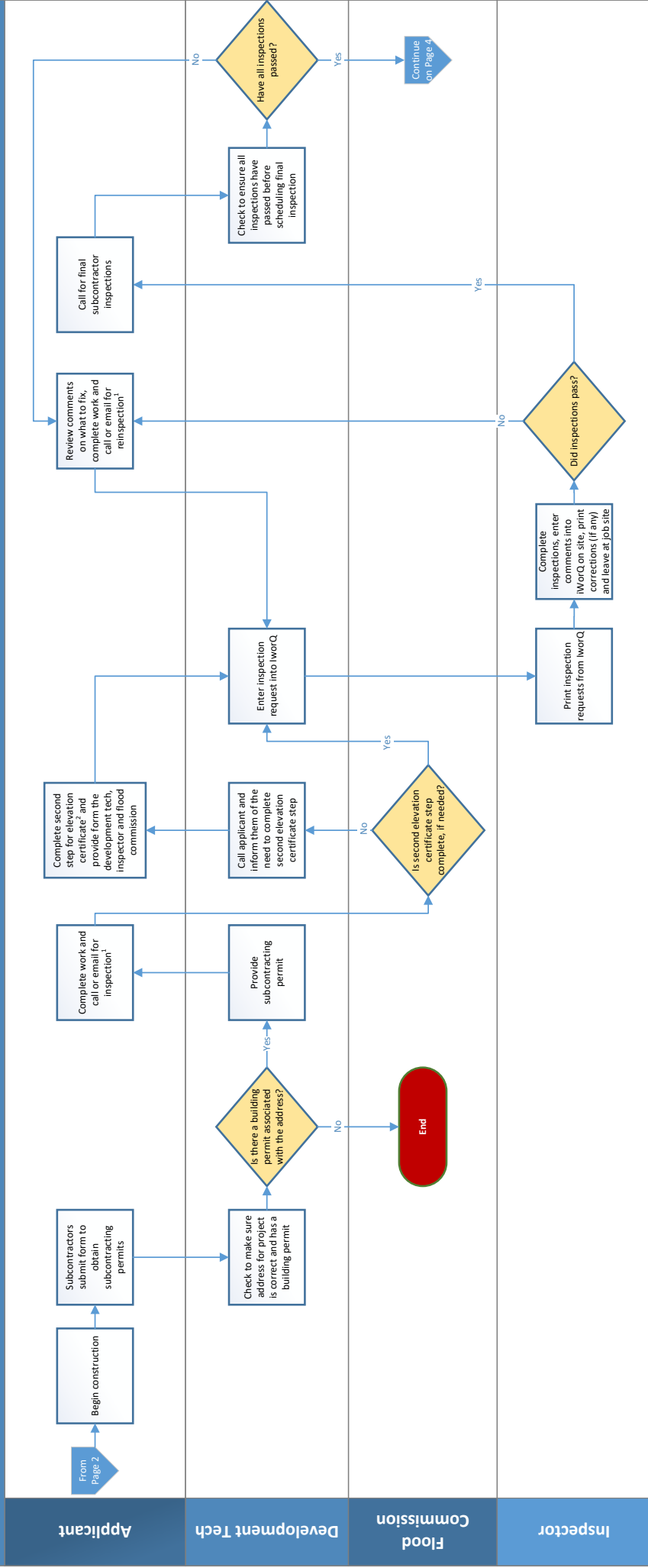
Applicant

Development Tech

Departments Reviewings

Residential Permit Process (Map 1 – Page 3 of 4)

Inspections



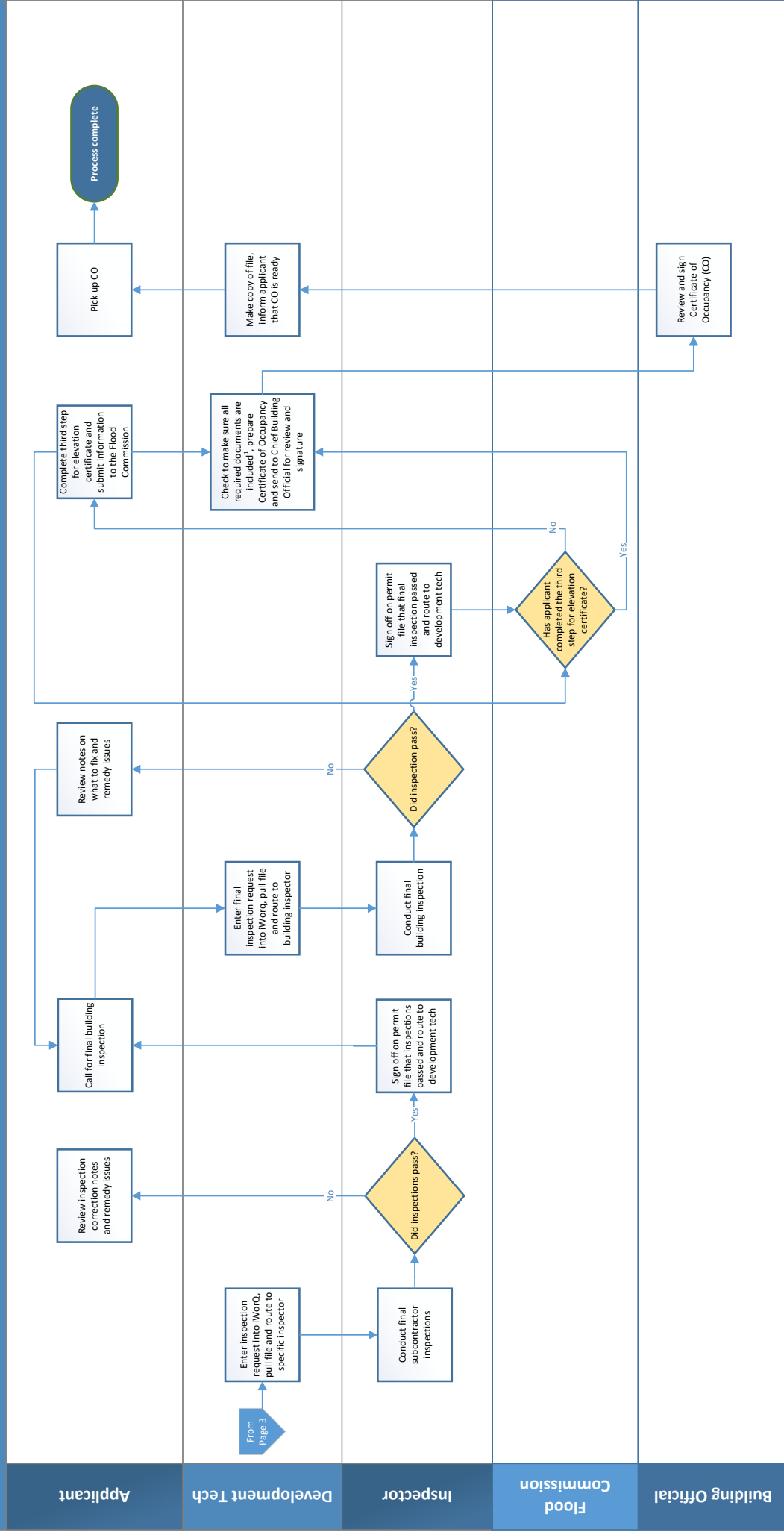
Notes  
 1. This is done for all trades separately.  
 2. Second elevation certificate step is to ensure proposed slab meets elevation requirements.



Doña Ana County Community Development Services Efficiency Review

Residential Permit Process (Map 1 – Page 4 of 4)

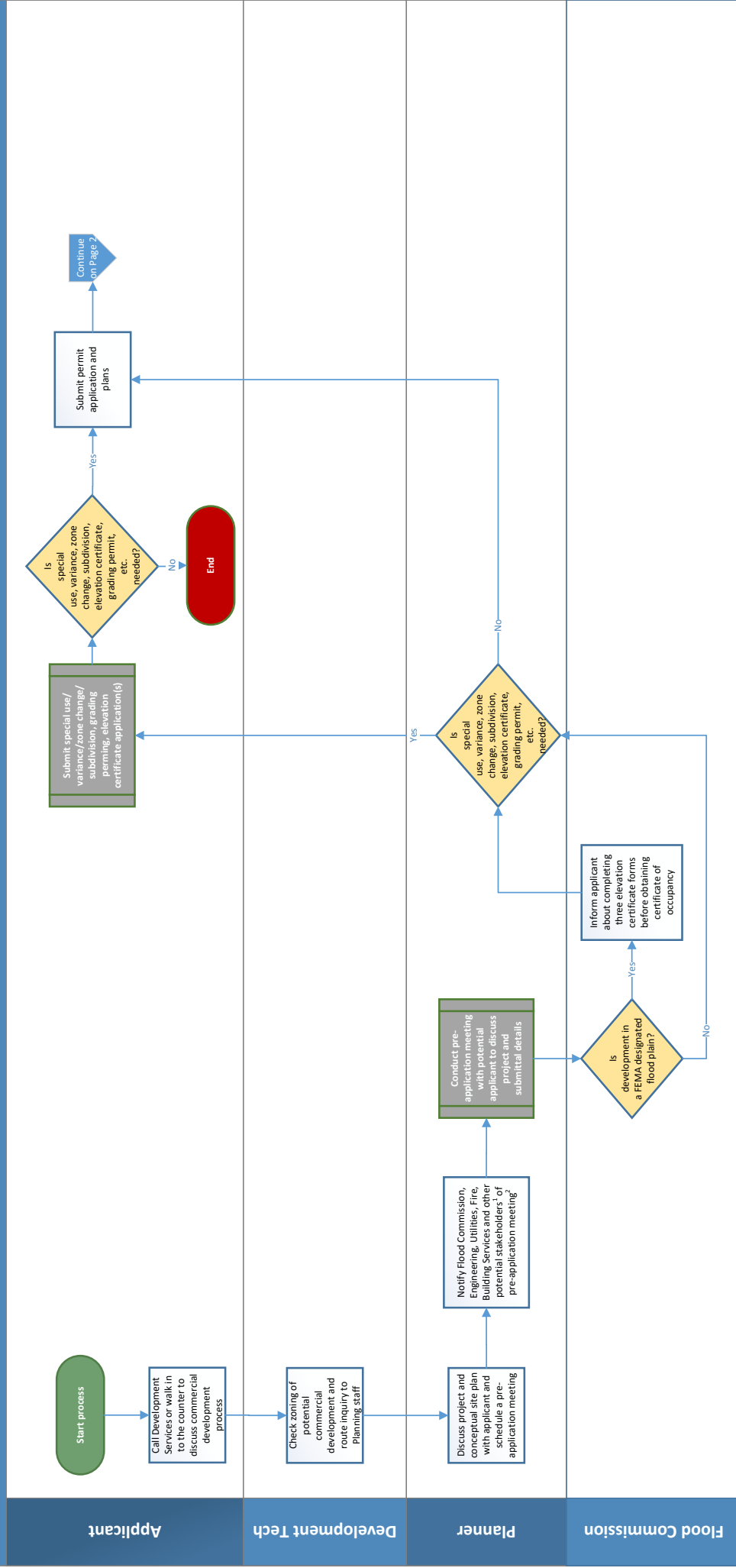
Inspections and Certificate of Occupancy



Notes: 1. Required documents include termite certificate, insulation certificate, septic operation permit, SWPP notice of termination, elevation certificate.

Commercial Construction Permit Process (Map 2 – Page 1 of 5)

Pre-Application



Notes  
 1. Other potential stakeholders include state agencies, private utilities, etc.  
 2. Pre-application meetings should be scheduled at least one week in advance.

Commercial Construction Permit Process (Map 2 – Page 2 of 5)

Intake

Applicant

Submit application materials, including first elevation certificate form, to the development tech<sup>1</sup>

Provide information to development tech for application

Development Tech

From Page 1

Does applicant have all materials for submission?

Yes

Complete plan review application in iMorq

Confirm all documentation is received, collect fees<sup>2</sup>

Does applicant have to submit a SWPP or a driveway permit?

Continue on Page 3

Print email, locate application, and write disposition on the application in the packet

Engineering

Receive SWPP binder/driveway permit and review

Is SWPP/driveway permit accepted?

Email yes/no disposition to development tech and engineer

**Notes**  
 1. Four sets of plans are submitted for commercial developments.  
 2. The applicant is given the choice to pay either 25% or the full amount up front.

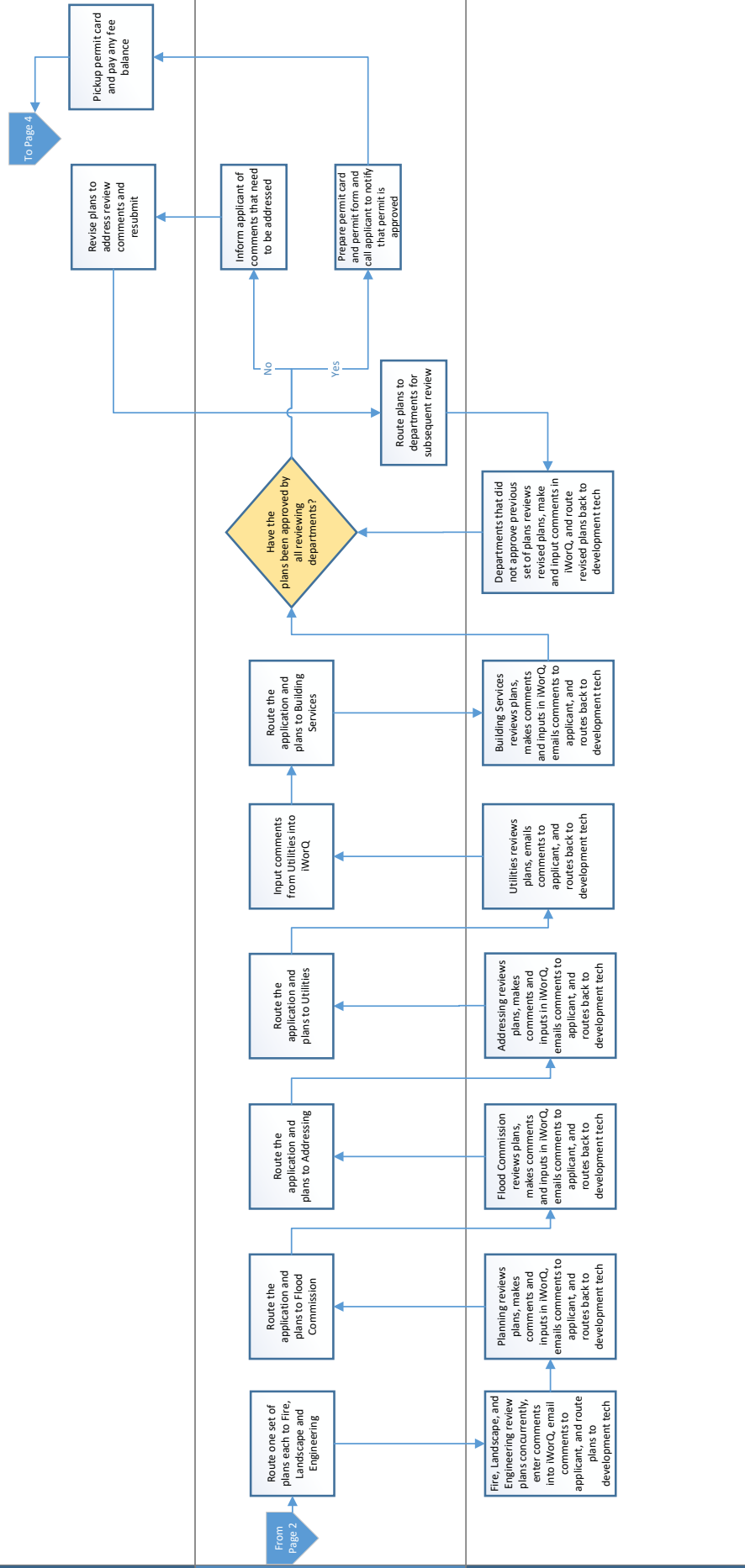
Commercial Permit Process (Map 2 – Page 3 of 5)

Plans Review and Routing

Applicant

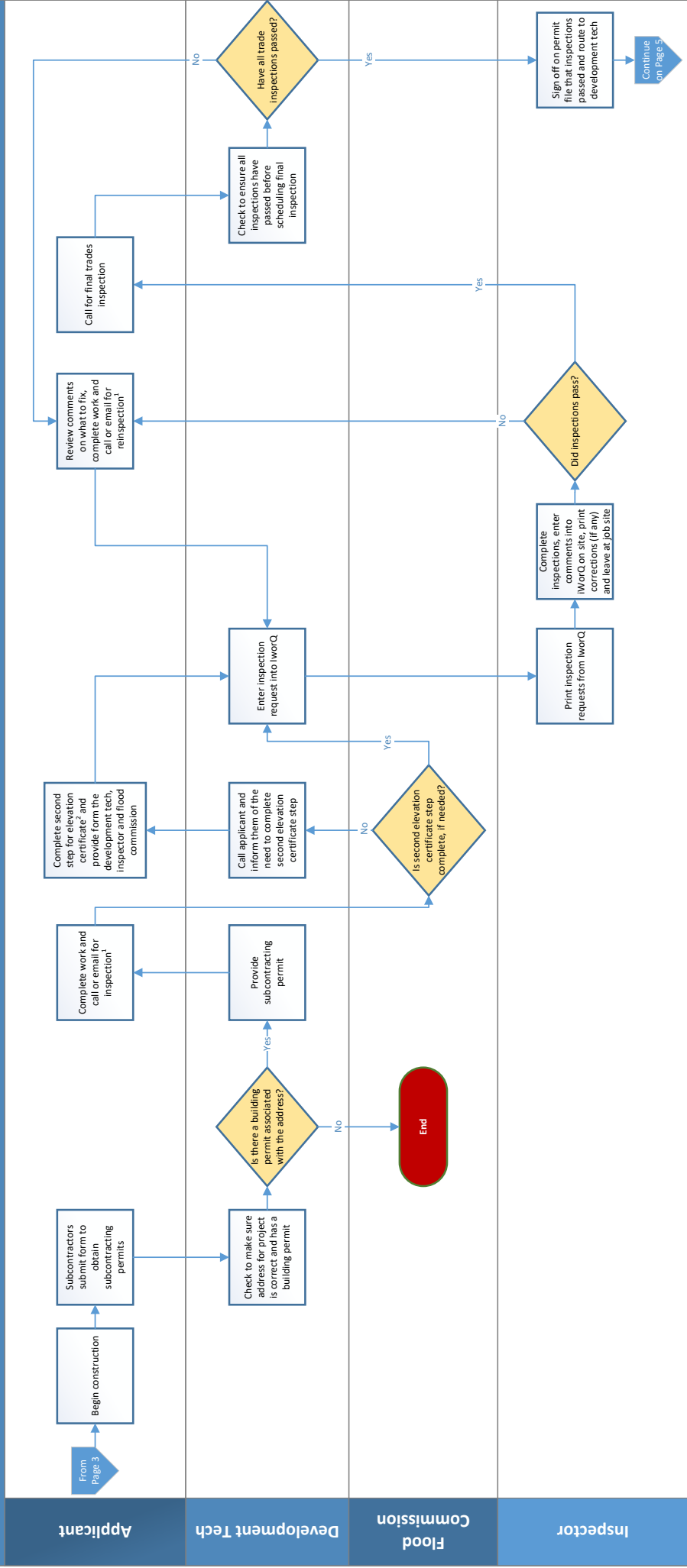
Development Tech

Reviewing Departments



Commercial Permit Process (Map 2 – Page 4 of 5)

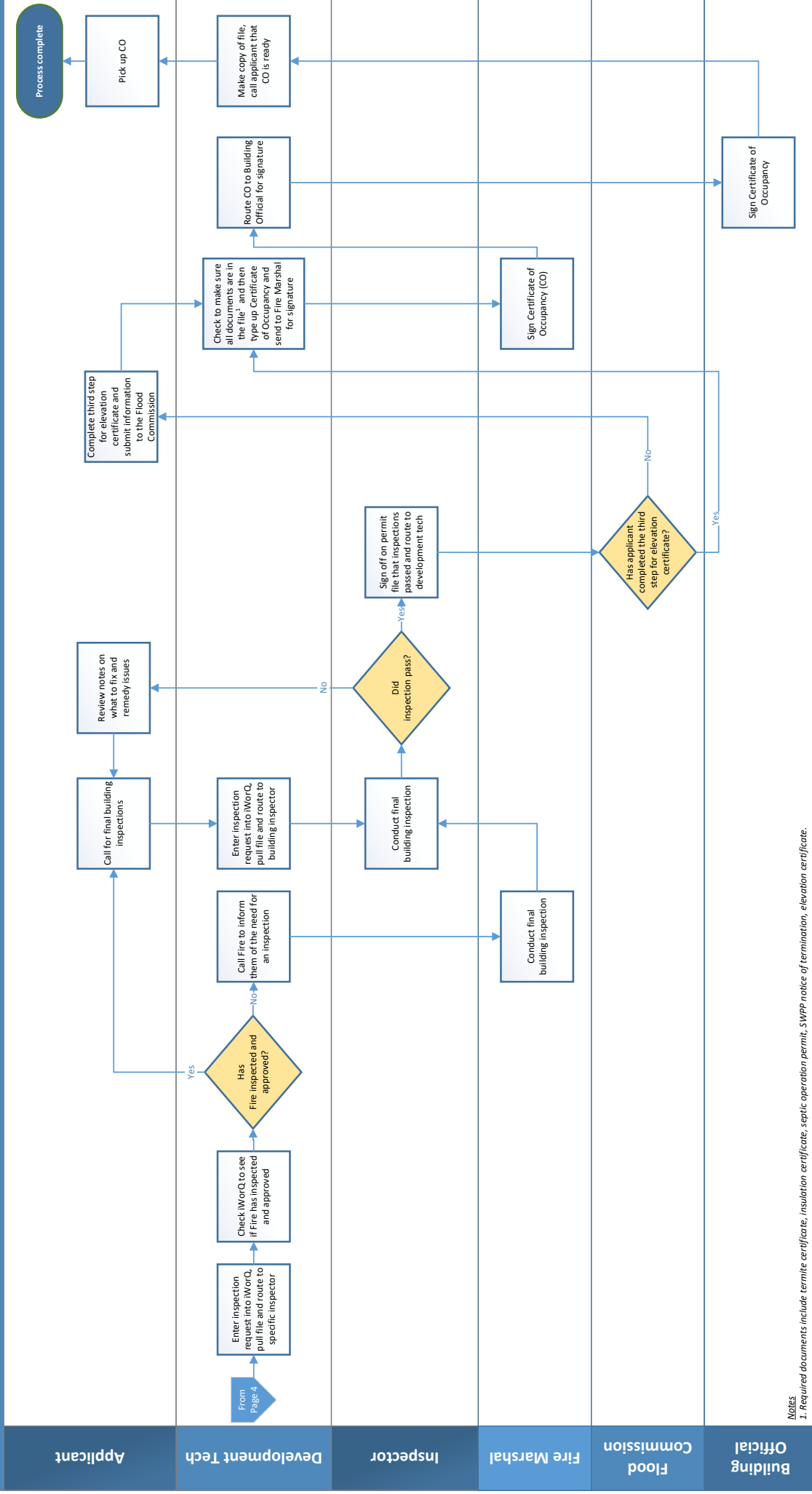
Inspections



Notes  
 1. This is done for all trades separately.  
 2. Second elevation certificate step is to ensure proposed slab meets elevation requirements.

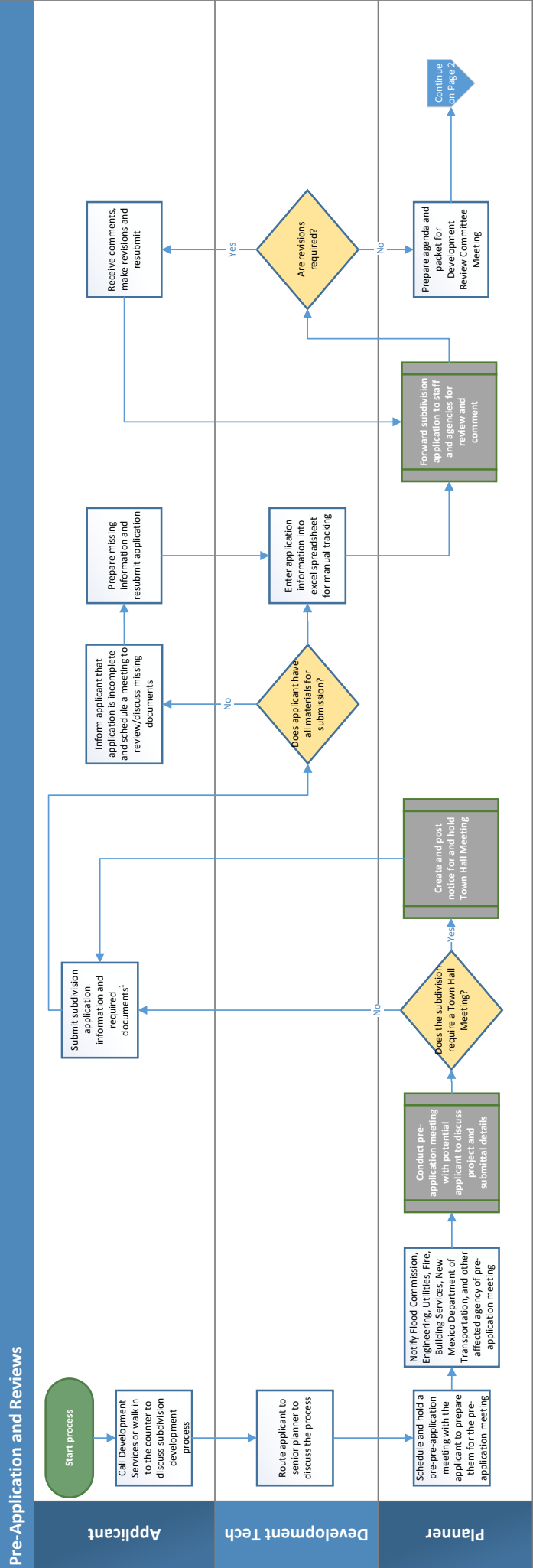
Commercial Permit Process (Map 2 – Page 5 of 5)

Inspections and Certificate of Occupancy



Notes  
1. Required documents include termite certificate, insulation certificate, septic operation permit, SWPP notice of termination, elevation certificate.

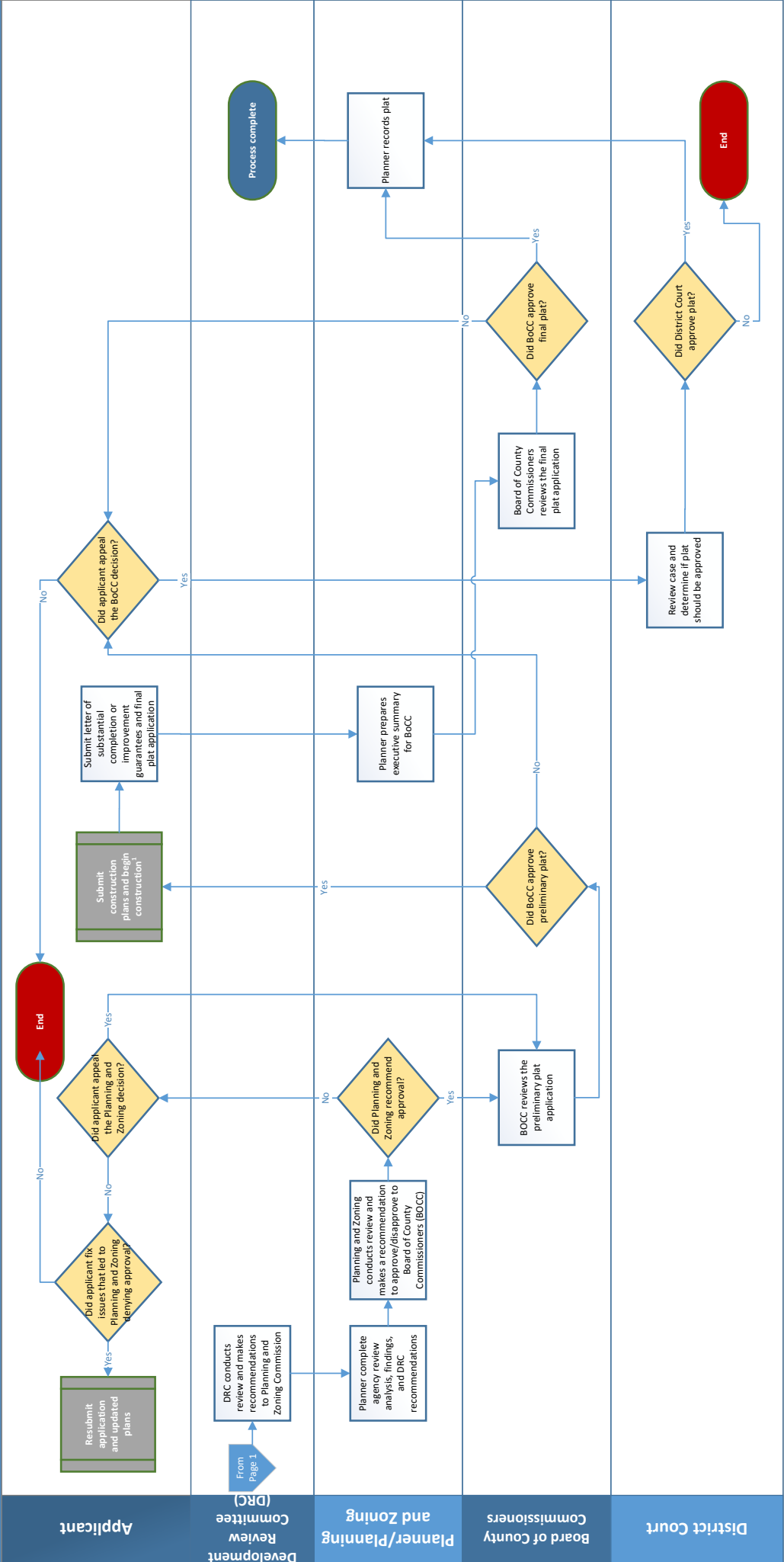
**Subdivision Application Process (Map 3 – Page 1 of 2)**



**Notes**  
 1. Applicant has the option to submit just preliminary plat application or preliminary plat and construction plans. If construction plans are also submitted they will get reviewed concurrently with the preliminary plat application.

Subdivision Application Process (Map 3 – Page 2 of 2)

Hearing Process



Notes  
1. Applicant has three years following BoCC approval of the preliminary plat to finish construction.



## Attachment C – List of Agency Websites

Albuquerque, NM: <https://www.cabq.gov/planning/online-forms>

Bernalillo County, NM: <https://www.bernco.gov/public-works/forms-applications.aspx>

El Paso, Texas: <http://www.elpasotexas.gov/planning-and-inspections/applications>

Phoenix, AZ: <https://www.phoenix.gov/pdd/planning-zoning/pzdocs>

Scottsdale, AZ: <https://www.scottsdaleaz.gov/planning-development/forms>

Tucson, AZ: <https://www.tucsonaz.gov/pdsd/all-application-forms-submittal-requirements>

## Attachment D – Technology Upgrades in Other Public Agencies

Management Partners compiled a list of jurisdictions who have recently upgraded, or who are in the process of upgrading, their land management system. The information was derived from prior clients and public information available online. While this information tends to emphasize a few vendors, there are many software systems that should be considered as a part of a needs assessment. Of course, Management Partners does not endorse any particular system.

Jurisdiction	Status of Land Management System Implementation	Software Vendor
Bernalillo County, NM	Implementation completed	Accela SaaS Civic Platform
El Dorado County, CA	Implementation completed	TRAKiT
Forsyth County, GA	Implementation completed	Tyler EnerGov
Pasco County, FL	Implementation completed	Accela Planning
Riverside County, CA	Implementation completed	Tyler EnerGov
San Diego County, CA	Implementation completed	Accela Planning
San Mateo County, CA	Implementation completed	Accela Planning
Alexandria, VA	Implementation completed	Tyler EnerGov
Carlsbad, CA	Implementation completed	Tyler EnerGov
Charlotte, NC	Implementation completed	Accela Planning
Costa Mesa, CA	Vendor selected	Tyler EnerGov
Detroit, MI	Implementation completed	Accela Planning
El Paso, TX	Implementation completed	Accela Planning
Fullerton, CA	Implementation underway	Tyler EnerGov
Hillsboro, OR	Implementation completed	Accela SaaS
Laguna Niguel, CA	Implementation completed	TRAKiT
Lake Forest, CA	Implementation completed	Tyler EnerGov
Largo, FL	Implementation completed	TRAKiT
Los Altos, CA	Implementation completed	TRAKiT
Los Angeles, CA	Implementation completed	Tyler EnerGov
McAllen, TX	Implementation completed	Accela SaaS
Moorpark, CA	Implementation underway	Tyler EnerGov
Morgan Hill, CA	Implementation completed	TRAKiT
Newport Beach, CA	Implementation completed	Tyler EnerGov
Palo Alto, CA	Implementation completed	Accela SaaS
Pasadena, CA	Implementation underway	Tyler EnerGov
Santa Ana, CA	Vendor selection underway	Tyler EnerGov, Accela Planning
St. Augustine, FL	Vendor selection underway	Cityworks PLL
Tampa, FL	Implementation completed	Accela SaaS
Temecula, CA	Implementation completed	Tyler EnerGov

## Attachment E – Sample Performance Measures

Sample performance measures are outlined below. They are presented by the key phases of the development review process in Doña Ana County to illustrate how measures could be used for various parts of the process. Further, we have grouped the measures by type.

### ***Pre-Application and Intake Phase***

#### Efficiency Measures

- Number of customers handled per intake full-time equivalent employee (FTE)
- Number of calls answered per FTE

#### Effectiveness Measures

- Percent of customers rating intake functions as good or excellent
- Percent of incomplete applications accepted (by type)
- Percent of applications rejected (by type)
- Average customer wait time at the intake counter
- Percent of projects participating in pre-application review

#### Workload Measures

- Number of customers assisted:
  - By application type
  - By type of visit (i.e., Building Division, Planning, Neighborhood Services)
  - By time of day
- Number of applications accepted
- Number of applications rejected
- Number of calls answered

### ***Plan Review and Routing Phase***

#### Efficiency Measures

- Number of plan reviews completed per FTE (by type)
- Cost per plan review completed (by type)

#### Effectiveness Measures

- Percent of plan reviews completed within X days
  - By Building Services
  - By each other department
- Percent of plans approved after the first cycle of review (by type)
- Percent of plans approved after two cycles of reviews (by type)
- Percent of plans requiring more than two cycles of review (by type)
- Percent of applications routed within one business day

Workload Measures

- Number of plans reviewed (by type)
- Number of plans approved
- Number of plan reviews completed by staff outside of the Building Division
  - Fire
  - Engineering
  - Other departments or agencies

***Permit Issuance and Inspection Phase***

Efficiency Measures

- Number of inspections completed per FTE per day (by type)
- Cost per inspection completed (by type)

Effectiveness Measures

- Percent of permits issued within X days of plan approval
- Percent of scheduled inspections completed within 72 hours
- Average number of days from plan approval to permit issuance
- Average number of days from application submittal to permit issuance
- Percent of projects reviewed and approved over the counter

Workload Measures

- Number of first inspections completed
- Number of re-inspections completed
- Number of permits issued