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Long Island Government Survey:

Permit Review Process and Downtown Development

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LONG ISLAND
INDEX



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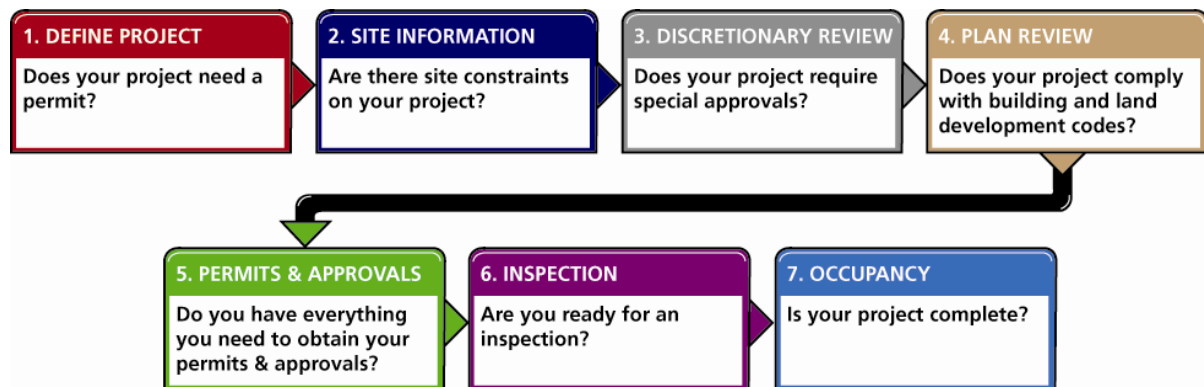
A. BACKGROUND AND EXECUTIVE SUMMARY

Background

This report is based on an Internet survey conducted by Zucker Systems¹ in conjunction with the *Long Island Index* in September and October 2010. Emails were sent by the *Long Island Index* to 44 cities, towns, and villages located on Long Island, along with a reference to access the survey through Survey Monkey. Thirty-six jurisdictions returned the surveys, with some completing only partial surveys (see Table 1 for a listing of participating jurisdictions).

Defining the Development Review Process

The development review process includes the steps used by a municipality to manage and review a new building project from initial concept through to occupancy of the building. The process includes reviewing plans, conducting inspections, and issuing permits, approvals, and certificates. Below is a flow chart created by San Diego, California's Planning Department to describe the stepping stones in the process.



Defining Best Practices and National Standards

In several places in this report, comparisons are made to best practices and national standards. Best practice is based on Zucker Systems' more than 40 years of experience in management and process consulting (see Appendix A for details) and the compilation of most effective processes we have defined based on our work. A list of these best practices is provided in Appendix A. It is recognized that local conditions may not always allow best practices to be implemented, or in some cases local conditions may vary from best practice. Those are the types of issues that practitioners face in any field. But starting with a list of the most effective practices allows an analysis of the development review process to start at an agreed upon point.

National standards are also referred to in this report. There is no agreed upon listing of national standards in the development review field. Again, based on years of experience and considerable consulting work across 160 cities and counties in 30 states, these standards are based on Zucker Systems' findings from our research, teaching and from regular contact with planners across the country.

¹ See Appendix A for information about the experience and credentials of Zucker Systems.

Executive Summary

While many of the development processes on Long Island need to be improved in order to encourage downtown development and renewal, there are no overriding issues that should prohibit such development if the political will is there.

A number of items are key to downtown efforts, including:

- **Comprehensive Plans and Zoning:** First and foremost for downtown development is the need for a clear community vision or perspective on what is desired. This effort generally starts with a Comprehensive Plan. All the cities and towns have such a plan but only about half of the villages do. Additionally, many of the plans are more than 10 years old and need updating, and some were never formally adopted. It is also essential that an up-to-date Zoning Ordinance is in place to carry out the vision of the Comprehensive Plan.
- **Staffing and Consultants:** Adequate staff is essential for creating the vision for downtown and also for processing development proposals on a timely basis. Jurisdictions' staffing levels range from one development review staff member for every 445 residents to one staff for over 30,000 residents. Some of the jurisdictions appear to be clearly understaffed. When this happens, jurisdictions can still progress with selected use of consultants. The Long Island villages tend to use consultants more than do the cities and towns.
- **Processing and Processing Timelines:** Applicants in virtually every community we work with nationwide have one major complaint: it takes too long to obtain project approvals. Slow approvals can increase the cost of downtown development as well as reduce the quality of development. In some cases, approval times may be so slow and arduous that they deter desired development. In order to encourage downtown development, we have suggested approval times for a variety of application types (see report and Appendix B). There is a need to shorten these times for many of the Long Island jurisdictions. Nationwide, many jurisdictions have addressed this issue through the use of expedited or fast-track approvals for downtown development. While almost all of the Long Island cities and towns have a fast-track process (though not necessarily for downtown development), most of the villages do not.

We did note one processing timeline where many of the Long Island jurisdictions are out of step not only with best practice but with a nationally accepted standard. The national standard is next-day inspections once a project is under construction. On Long Island, only one town offers day-of or next-day inspections and less than half of the villages do. The lack of next-day inspections can have a major impact on the cost and timing of downtown development.

Processing timelines can also be shortened by co-locating development review staff and establishing inter-departmental review committees. Many specialists are normally required to review development plans. These include planners, engineers, and infrastructure planners, among others. It is useful if these professionals are co-located. A high percentage of Long Island jurisdictions have co-located staff—more than we see nationally. However,

this can likely be attributed to Long Island's multitude of governmental entities and the relatively small size of population and small number of staff for Long Island jurisdictions. Another critical component to promoting good communication between the various reviewing functions is the use of inter-departmental review committees. On Long Island, only half of the cities and towns and a quarter of the villages use such a system.

- **Focused Organizations:** Successful downtowns often have one or more groups or agencies that provide support, organization and funding for downtown efforts. A number of Long Island jurisdictions have these organizations, including Business Improvement Districts, Community Development Agencies, Economic Development Boards, Design or Architectural Review Boards, and Historic Preservation Boards. Long Island jurisdictions that want to foster downtown development may wish to expand the use of these groups.
- **Technology:** Virtually all plans today are in electronic format. Most applicants are desirous of submitting plans electronically over the Internet. This can be particularly useful for downtown development, where the various design professionals may live in different cities or even different states. Although there are only a few jurisdictions nationwide that are fully electronic for plan submission and review, we predict that within five years, a high percentage will have achieved this goal.

This is a difficult issue for the Long Island jurisdictions because of the relatively small size of the populations. Only a handful of the jurisdictions are using electronic features in processing downtown development. The likely approach will be for jurisdictions to band together as is taking place with the 10 towns in Suffolk County for the County's Unified Permit Portal.

Once electronic features are in place, it will be essential for jurisdictions to accept credit cards over the Internet. Less than a fourth of the Long Island jurisdictions accept credit cards for development review fees and only one accepts them over the Internet.

Appendix B compares the Long Island jurisdictions to a variety of factors to what we consider to be best practices and the norm for fostering downtown development.

B. SURVEY PARTICIPANTS

The cities, towns, and villages that participated in the survey are shown in Table 1, with their population from the 2000 Census or a more recent population estimate if available. Nassau and Suffolk Counties were not directly included in the survey since they perform a review function for selected applications only as specified by State law.

Table 1.

Jurisdictions that Participated in Survey

Suffolk Jurisdictions	Population*	Nassau Jurisdictions	Population*
Towns		Towns**	
Babylon	220,343	Hempstead	770,849
Brookhaven	483,748	North Hempstead	223,878
East Hampton	22,202		
Huntington	206,952	Cities	
Islip	344,994	Glen Cove	25,154
Riverhead	32,251	Long Beach	31,654
Shelter Island	2,228		
Smithtown	122,957	Villages ****	
Southampton	52,950	Bayville	7,135
Southold	21,939	Cedarhurst	6,164
		Farmingdale	8,399
Villages ***		Freeport	43,783
Amityville	9,441	Garden City	21,672
Babylon	12,615	Great Neck Plaza	6,433
Bellport	2,363	Hempstead	56,554
East Hampton	1,334	Lake Success	2,797
Greenport	2,048	Lynbrook	19,911
Patchogue	11,919	Mineola	19,234
Port Jefferson	7,837	Roslyn	2,570
Southampton	3,965	Valley Stream	36,368
Westhampton Beach	1,902	Westbury	14,263

*The population for cities and towns (except Shelter Island) is the U.S. Census Bureau American Community Survey 3-Year Estimate (2006-2008). The population for the Town of Shelter Island and all villages is from the Census 2000.

** Oyster Bay is the only town that did not participate in the survey.

*** The following Suffolk villages did not respond: Northport, Quogue, and Sag Harbor.

**** The following Nassau villages did not respond: Great Neck Village, Malverne, Manorhaven, and Rockville Centre.

C. SURVEY RESPONSES AND ORGANIZATION OF REPORT

The response counts and response percentages for each survey question are shown on the *Long Island Index* website. Summary response counts and percentages are shown by three groupings: all 36 jurisdictions combined, the 14 cities and towns combined, and the 22 villages combined. The cities and towns were grouped together since they, for the most part, have a higher level of population. Likewise, the villages, with generally lower populations, were grouped together. The responses for each jurisdiction are also provided on the *Long Island Index* website.

The data in this report is grouped into eight topics:

- Development Review Organizations
- Plans and Policies
- Development Processing Environment
- Planning Development Review Processes
- Building Plan Review
- Engineering Review
- Outside Agency Review
- Development Review Process: Comments and Suggestions

D. DEVELOPMENT REVIEW ORGANIZATIONS

Planning Commissions

Table 2.

**Planning Commission or Board Separate from
Legislative Body**

Jurisdiction	Separate	Not Separate
Cities and Towns	79%	21%
Villages	86%	14%
All jurisdictions	83%	17%

As shown in Table 2, 83% of the jurisdictions that responded to the survey have a Planning Commission/Planning Board separate from their legislative body (i.e., separate from their Town Council/Board, City Council, or Village Board). Seventy-nine percent of responding cities and towns and 86% of responding villages have a separate Planning Commission. In the remaining jurisdictions,

the elected officials also perform the functions normally performed by a Planning Commission. For downtown development, a Planning Commission can help the elected officials establish the vision for downtown and can assist in the application review process. Jurisdictions with a separate Planning Commission are in alignment with best practices.

Other Organizations

Table 3.

Other Organizations, Separate from Planning Commission

Other Organizations	Cities and Towns	Villages	All
Board of Adjustment or Appeals	79%	73%	75%
Business Improvement District	29%	23%	25%
Community Development Agency	50%	18%	31%
Design or Architectural Review Board	57%	68%	64%
Economic Development Board or Authority	7%	0%	3%
Environmental Review Board	21%	5%	11%
Hearing Officer	0%	0%	0%
Historic Preservation Board	50%	23%	33%
Industrial Development Agency	43%	0%	17%
Zoning Commission	21%	27%	25%

Table 3 shows the percentage of responding jurisdictions with organizations separate from the Planning Commission that may affect the development review processes. In small jurisdictions, many of these organizations are often combined with a Planning Commission, while in larger jurisdictions, they are often separate. The national trend and best practice is to reduce the number of organizations that must address each development application in order to make processes more efficient. This can be critical for a well functioning approval process for downtown development.

Boards of Appeals: Seventy-five percent of the jurisdictions have a Board of Adjustment or Appeals. This is consistent with the national trend.

Business Improvement Districts: Many jurisdictions that favor downtown development have found it beneficial to have a Business Improvement District. We consider this to be best practice. Only 25% of the responding jurisdictions have such an organization. Jurisdictions with a Business Improvement District include Glen Cove, Greenport, Great Neck Plaza, Huntington, North Hempstead, Patchogue, Port Jefferson, Riverhead, and Westbury.

Community Development Agency: Half of the cities and towns have a Community Development Agency, but less than a quarter of the villages (18%). Community Development Agencies can be an important part of downtown development efforts and are often present in jurisdictions stressing downtown development. They can be particularly important for funding infrastructure improvements. We consider them to be a best practice. Jurisdictions with such an agency include Brookhaven, Freeport, Glen Cove, Greenport, Hempstead Village, Huntington, Islip, North Hempstead, Patchogue, Riverhead, and Southampton Town.

Design or Architectural Review Board: A large percentage of jurisdictions nationwide that are concerned about their downtown areas have adopted some form of design or architectural review, often including a special board. Citizens increasingly are not only concerned with zoning use issues, but how the resulting buildings actually look. We consider concern for downtown design to be a best practice. This concern has also led to the current trend towards the adoption of Form-Based Codes.² We often see that Design or Architectural Review Boards delay approvals of downtown development. Therefore, we often favor design review and approval at a staff level or the use of techniques like Form-Based Codes. As shown in Table 3, more than half of the Long Island cities and towns (57%) have such a board and an even higher percentage of the villages (68%).

Economic Development Board or Authority: Economic Development Boards are sometimes used to support downtown development where recruiting of new business is important or financial incentives are needed to stimulate desired development. If there is a problem in recruiting new businesses, or a lack of funds for infrastructure improvement, an Economic Development Board would be considered a best practice. North Hempstead is the only jurisdiction that has such a Board.

Environmental Review Board: Environmental Review Board functions are handled by the Planning Commission in many jurisdictions. Separate organizations seem to be more prevalent in the eastern U.S. than the rest of the country. Eleven percent of the responding jurisdictions have such an organization. Best practice does include an evaluation of environmental issues; however, the evaluation is typically combined with the functions of a Planning Commission.

Hearing Officer: Some jurisdictions use a hearing officer to hear many of the cases that would otherwise be heard by a Planning Commission or even elected officials. This method is more common on the nation's west coast than east coast. None of the jurisdictions that responded to the survey use a hearing officer. While this is not unusual, we do consider use of a hearing officer as a best practice that would have the potential to streamline the approval process for downtown development.

Historic Preservation Board: Historic preservation is increasingly an important part of many jurisdictions' economic development efforts and quality-of-life concerns. We consider strong historic preservation efforts as a best practice that is particularly important for downtowns. Half of the cities

² A form-based code is a method of regulating development to achieve a specific urban form or a predictable physical outcome. Form-based codes emphasize form over land use. They can wholly replace existing zoning regulations or supplement existing zoning regulations.

and towns in the survey have such a board, and roughly a quarter of the villages in the survey (23%). Although this seems low, some of the jurisdictions may combine historic preservation review activities with the Planning Board. Jurisdictions with both a Historic Preservation Board and a Planning Commission should be careful that they do not unnecessarily slow the development approval process for downtowns. Jurisdictions with Historic Preservation Boards include Bellport, Freeport, Glen Cove, Greenport, Great Neck Plaza, Huntington, North Hempstead, Riverhead, Roslyn, Smithtown, Southampton Town, and Southold.

Industrial Development Agency: Industrial Development Agencies are often aimed at creating jobs or increasing the tax base for a community. They can be an important organization to help fund and facilitate downtown development. These agencies may be similar to an Economic Development Board and generally only one group is used to avoid duplication. When needed, we consider them a best practice. Forty-three percent of the cities and towns and none of the Villages have such an organization.

Zoning Commission: Best practice is to delegate increasing numbers of zoning actions to staff or to a Planning Commission. Zoning Commissions are mostly concentrated on the U.S. east coast. Having both a Zoning Commission and Planning Commission can lead to duplication of reviews and confusion for applicants. As such, we do not consider them best practice, and they can negatively affect downtown development. One fourth of the responding jurisdictions have such an organization.

Approvals by Elected Officials

Table 4.

Approvals by Elected Officials

	Cities and Towns	Villages	All
Comprehensive Plan	93%	67%	77%
Architectural/Design Plans	21%	10%	14%
Planned Unit Developments	57%	33%	43%
Site Plans	36%	29%	31%
Special Use Permits	50%	62%	57%
Variances	14%	5%	9%
Zoning Map	86%	91%	89%
Zoning Ordinance	93%	91%	91%
Subdivisions	14%	24%	20%

Table 4 shows the percentage of responding jurisdictions in which elected officials approve various items, such as Comprehensive Plans, Zoning Ordinances and Zoning Maps, subdivisions, site plans, and variances. A high percentage of jurisdictions require elected officials to approve Comprehensive Plans, Zoning Ordinances and Zoning Maps, which is consistent with national trends and best

practices. It appears that many of the development plans/permit types are either not used in many jurisdictions or are delegated to a body other than the legislative body. However, even in those instances, an appeal to the elected officials (i.e., a variance request) may be possible.

Of likely importance for downtown development are Architectural/Design Plans, Site Plans, and Special Use Permits. Although it appears that elected officials in most jurisdictions delegate approval of Architectural/Design Plans and Site Plans (only 14 percent and 31 percent, respectively, are approved by elected officials), 57 percent of Special Use Permits are approved by the elected officials. Given the nature of Long Island jurisdictions, it is likely that major downtown development may require a combination of the approvals listed in Table 4, which likely brings a higher percentage before elected officials. This is consistent with national trends and is simply a political reality. **However, best practices would dictate that as many of these functions as possible be delegated to staff, a hearing officer, or various boards and commissions. Given the likelihood of major downtown development being approved by elected officials, it is even more important than ever that the community develop a clear Comprehensive Plan for the downtown area.**

Staffing

Table 5.

Population per Combined Planners, Building Officials and Engineers

Up to 1,000 People per Employee	1,001 to 5,000 People per Employee	5,001 to 10,000 People per Employee	Over 10,000 People per Employee
6 jurisdictions	14 jurisdictions	6 jurisdictions	8 jurisdictions

The need for staff varies substantially depending on the size of the community, the amount of development activity or planning needs. Best practices dictate that adequate staff or consultants be available to prepare needed plans and process development in a timely manner when development volumes increase. The number of staff per population can be very misleading given the variable nature of jurisdictions and their staffing needs. Nevertheless, some general information for Long Island jurisdictions can be insightful. Table 5 indicates the population for the combined number of planners, building officials and engineers in the responding jurisdictions. **Staffing varies substantially by jurisdiction.** Staffing levels range from one employee per 445 people to less than one employee per 30,000 people. The six jurisdictions that have the highest ratio of employees to population include East Hampton Village, Greenport, Roslyn, Shelter Island, Southampton Village, and Westhampton Beach. All of these jurisdictions have less than 4,000 population.

In addition to planners, building officials and engineers, other staff involved with the development process include the community attorney, Economic Development Director, Village Administrator, Director of Historic Services, Mayor and elected officials, environmental analysts, map drafters, and Director of Land Management, to name a few. This mix of specialists is a common feature of most jurisdictions as the planning, engineering and development process become more complex.

However, care must be taken to coordinate the various specialties effectively, so that they do not overly delay approval processes. This is particularly critical for downtown development.

Many of the jurisdictions use consultants to supplement their staff, as described below.

Consultants

Nationwide, many jurisdictions use consultants to meet review time targets and performance standards when the volume of activity exceeds the availability of staff, or in some cases simply to replace staff. Other instances include when specialization is needed that does not exist within the jurisdiction's staff. Use of stand-by consultants in both of these instances can be considered best practice. Very few of the responding cities and towns use consultants for fire prevention or building. Approximately one-third use consultants for planning and engineering. The numbers increase for villages, with approximately one-quarter using consultants for fire and building, and roughly half using consultants for engineering and planning. Overall, Long Island jurisdictions use consultants less frequently than jurisdictions nationwide.

Staff Functions Included in Planning Departments or Equivalent

Table 6.

Functions Combined with Planning

Jurisdiction	Cities and Towns	Villages	All
Building Plan Review	43%	78%	63%
Building Inspection	29%	50%	41%
Board of Adjustment or Appeals	57%	33%	44%
Capital Improvement Program	29%	11%	19%
Current Planning	86%	50%	66%
Design Review	79%	67%	72%
Economic Development	29%	11%	19%
Environmental Review	64%	67%	66%
Hearing Officer	0%	6%	3%
Historic Preservation	64%	17%	38%
Interpretations of Zoning Ordinance	50%	56%	53%
Long-Range Planning	79%	33%	53%
Redevelopment	64%	33%	47%
Subdivisions	86%	83%	84%
Transportation Planning	57%	22%	38%

The national trend for many jurisdictions and best practice is to merge the development-related functions in one department. This includes the building, planning and engineering functions, but normally not the fire function. Table 6 above summarizes the organizational data for the responding jurisdictions. The survey did not include the engineering category. A few items stand out, including:

- Building and planning are combined more often in the villages than in the cities and towns.
- The cities and towns tend to combine more functions with planning than do the villages. For example, 57% combine Board of Appeals with planning, 29% combine capital improvement program, 86% combine current planning, 79% combine design review, 64% combine historic preservation, 79% combine long-range planning, 64% combine redevelopment and 57% combine transportation planning.

Best practice suggests that that the cities, towns and villages would benefit by combining some or all of the functions listed in Table 6 in one department. Given the nature of downtown development, we feel it is particularly important to combine the building and planning function.

Building plan review (and in some cases building inspection) is combined with planning in Amityville, Bayville, Bellport, Cedarhurst, East Hampton Town, Farmingdale, Garden City, Glen Cove, Greenport, Great Neck Plaza, Hempstead Town, Hempstead Village, Islip, Long Beach, Lynbrook, Mineola, Roslyn, Smithtown, Valley Stream, and Westbury.

Efforts to Improve the Development Review Process

Less than a fourth (24%) of the responding jurisdictions have completed any type of development review process improvement, such as departmental or process audits. Another 12% of jurisdictions have undertaken partial improvements, such as solicitation of developer feedback on a case-by-case basis. Some of the improvements may have occurred more than 10 years ago. Overall, the cities and towns were more aggressive in this area, with 46% having completed improvements and 8% having undertaken partial improvements. This is generally consistent with national practice. As would be expected, only 10% of the smaller jurisdictions (villages) have completed improvements and another 15% partial improvements.

Best practices indicate that a comprehensive review of the development review process be completed every 5 to 10 years. Downtown development is creating the need for new approaches and processes. As such, a review of the development process is particularly critical. Jurisdictions that have completed some type of development review process improvement include East Hampton Town, East Hampton Village, Hempstead Town, Hempstead Village, Islip, Long Beach, Southampton Town, and Southold. Partial improvements have been undertaken by Greenport, Mineola, North Hempstead, and Roslyn.

E. PLANS AND POLICIES

Comprehensive Plans and Policies

Close to one third (29%) of the responding jurisdictions do not have a Comprehensive Plan. Many more jurisdictions have outdated plans or plans that were never formally adopted. Such plans are essential in order to provide the policy framework and vision for downtown development. Almost half (48%) of the villages do not have a Comprehensive Plan, while many more have outdated plans. The high percent of villages not having a Comprehensive Plan is unusual and is not consistent with best practices. Many states currently require local jurisdictions to adopt a Comprehensive Plan.

Of the jurisdictions that have updated their Comprehensive Plans, three were adopted in the last five years (2006 to 2010) and six were adopted between five and ten years ago (2001 to 2005). The other 14 are older and need updating. Several of the older plans are from the 1960s or 1980s. Many jurisdictions have changed over the last ten years, and expectations and desires of citizens and businesses may have changed. As such, normally a plan that is more than 10 years old needs to be updated. Best practice is to update the plan at least every 10 years; however, some jurisdictions set a five-year target. Several jurisdictions that responded to the survey are currently preparing plan updates.

Zoning

For most of the responding jurisdictions, zoning is either consistent with the Comprehensive Plan (67%) or partially consistent (29%). Only one jurisdiction has zoning that is not consistent. Long Island jurisdictions appear to be taking a uniform approach to this topic. Best practices would indicate that zoning should be consistent with the Comprehensive Plan.

F. DEVELOPMENT PROCESSING ENVIRONMENT

Co-location of Development Review Staff

The national trend and best practice is the co-location of all or most staff that is involved in the review of development projects. Co-location can provide good staff communication. The Long Island jurisdictions in the survey score high on this practice. Eighty-six percent of jurisdictions' development review staff (i.e., planning, engineering, building, etc. staff) are located in the same building or within close proximity, and another 6% of jurisdictions have partially co-located staff. This is higher than we see nationally, but can likely be attributed to the relatively small size of population and small number of staff for the Long Island jurisdictions.

Technology

Only seven of the jurisdictions use development review software. These include Babylon Town, Brookhaven, East Hampton Village, Glen Cove, Hempstead Town, Islip, and Roslyn. Best practices and the national trend favors the use of software, along with Internet access to an online permit tracking system and geographic information systems (GIS). Only one of the jurisdictions, Westhampton Beach, has an online permit tracking system.

The national trend is to accept plans over the Internet and conduct electronic plan check. Most plans are developed electronically by architects and engineers, so it is useful for applicants and related professionals to submit plans electronically. Electronic plan submittal reduces costs, shortens timelines, and reduces the need for paper. East Hampton Village, Great Neck Plaza, and Westhampton Beach accept some plans over the Internet.

Once plans are received electronically, they should ideally be reviewed electronically. Electronic plan check software is currently not the national norm, but is best practice. Islip, North Hempstead, and Smithtown have the ability to mark up plans electronically, allowing for immediate sharing of comments between development-related departments.

Given the size of the Long Island jurisdictions, heading towards the national trend of accepting plans online and conducting electronic plan check could be difficult. However, it may be possible for several jurisdictions to adopt the same system, which could result in substantial savings as well as simplification of the processes for applicants. The 10 towns in Suffolk County have agreed to participate in a unified permit portal, with the goal of having all development review-related materials online.

Survey respondents' comments shed additional light on the challenges of embracing technology in the development review process. A few respondents noted that based on New York State law, although interim review copies can be sent electronically, formal application materials must still be hard copies, which limits the ability of jurisdictions to process applications entirely electronically. One jurisdiction commented that their lack of large format printing capability also necessitates provision of hard copies of plans. Another jurisdiction noted that most staff from reviewing departments are opposed to going electronic. It appears that in order to fully proceed with electronic plan submittal and plan check, New York State law may need to be changed. Staff being opposed to electronic plan check is not unusual. However, we predict that over the next five years, developers will begin to insist on electronic filings. This means that attitudes toward electronic submittal will need to change and staff training will be required.

Hard-Copy Handouts and Websites

The amount of information about the development review process—application forms; review timelines; fee schedules; policies, rules, and regulations; and process flow charts—available in hard copy format and online varies substantially by jurisdiction. The national trend and best practice is to have virtually all relevant items related to the development process available in hard copy and shown on the municipal website.

- **Building Permits and Inspection:** Many of the Long Island jurisdictions in the survey have handouts for the building permit and inspection functions. This is consistent with best practices and national experience. Most but not all of these handouts are also on the jurisdictions' websites.
- **Engineering Permits, Reviews and Inspections:** Only roughly half of the jurisdictions have hard-copy handouts or website materials for engineering permits, reviews, and inspections. Less than a third of responding jurisdictions have hard-copy handouts with engineering policies, rules and regulations, which is particularly troubling. Only one jurisdiction has process flow charts for the engineering function. We often see that a lack of good engineering policies and process flow charts creates development processing issues in jurisdictions. This can be an important issue affecting downtown development, since each project would need to be reviewed without well thought-out and/or readily known engineering policies and standards.
- **Fire Permits and Inspections:** Only roughly half of the jurisdictions have hard-copy handouts or website material for the fire permits and inspection function.
- **Planning Process:** Roughly three quarters of the jurisdictions have hand-outs and website material for the planning process.

- **Development Review Timelines:** Only six of the jurisdictions indicated that they provide development review timelines in hard-copy handouts, and only five provide them online. Timelines are essential for a good and timely development review process. Provision of timelines is consistent with national best practices.

Fees

Most fees in the Long Island jurisdictions are accepted by cash or check. **Eighty-three percent of the responding jurisdictions do not accept credit cards for payment of development review fees** (only 21% of cities and towns and 14% of villages accept credit cards). None of the villages accept credit cards by mail, Internet or telephone and only one of the towns (Riverhead) accepts credit cards over the Internet. The national trend and best practice is to accept credit cards in person, by mail, phone and over the Internet. As electronic plan submission gradually becomes the norm, it will be necessary to accept credit cards over the Internet.

G. PLANNING DEVELOPMENT REVIEW PROCESSES

Pre-Application Meetings

Virtually all the responding jurisdictions provide for a pre-application meeting with key staff involved in the development review process. This is consistent with most planning functions in the U.S., is essential for downtown projects, and is the accepted best practice.

Complete Applications

Many jurisdictions require a complete application before beginning the review of an application. This is a best practice. For Long Island jurisdictions, roughly a fourth of the applications submitted are complete (24%) and another almost two thirds are somewhat complete (62%). The lack of a complete application generally slows down the approval process.

Inter-Departmental Review Committees

The national best practice is to have inter-departmental review committees to review development applications. Some jurisdictions, but not all, have the applicant attend the committees' meetings. **Roughly one third of the responding jurisdictions on Long Island (35%) have inter-departmental review committees, but two thirds (65%) do not.** Fifty percent of the responding cities and towns have committees, while only 25% of the responding villages do. **The lack of such meetings can slow down the process and result in inconsistent comments from various reviewing functions.**

Decision-Making Authority

Best practices have one person empowered with decision-making authority to troubleshoot issues and make critical development-related decisions quickly. While we believe this is best practice, few U.S. communities follow this model. However, of the Long Island jurisdictions surveyed, a surprising 44% indicate they have such a person. The percentage for cities and towns is 57% and 35% for villages. It appears that this person is often the building official. Despite the fact that many Long Island jurisdictions have such a decision-making person, a high percent of major projects, and likely

most downtown projects on Long Island, still must be approved by either a Planning Commission, elected officials or both, which can delay the approval process.

Fast-Track/Expedited Review

Many jurisdictions nationwide have a fast-track and/or expedited review process for selected types of projects. For example, if a community wants downtown development or projects with a positive economic impact, these could be a candidate for fast-track. Additionally, many jurisdictions will expedite review if the applicant pays an additional fee. Best practices provide for both fast-track and expedited reviews for any type of project. For the Long Island cities and towns that responded to the survey, 93% have a fast-track/expedited process, but only 25% of the responding villages do. It appears that most of the fast-track requirements are for specific types of projects, rather than giving the applicant the ability to ask to fast-track any type of project. Additionally, several of the Long Island jurisdictions fast-track a different type of project than downtown development (e.g., some jurisdictions fast-track solar permits but not downtown projects). **A fast-track and/or expedited review process could be used by more Long Island jurisdictions as an incentive for downtown development.**

Planning Review Timelines

Table 7.
Target Number of Days for Planning Reviews

	Number of Days					
	1-10	11-20	21-30	31-50	51-80	More than 80
Architectural/Design Plans	36%	21%	29%	14%	0%	0%
Planned Unit Developments	0%	15%	15%	23%	15%	31%
Rezoning	0%	13%	13%	7%	27%	40%
Site Plans	20%	13%	20%	33%	13%	0%
Special Use Permits	7%	21%	29%	14%	21%	7%
Subdivisions	8%	8%	23%	23%	15%	23%

Of the responding cities and towns, only 43% have set a target number of days for review of planning projects, and only 20% of the responding villages have set a target date. Nationally, we estimate that roughly half of jurisdictions set targets for plan review. However, best practices dictate that targets be set for all applications and met 90% of the time. Given the complexity of some downtown development, it is critical that target times be set for such development.

Table 7 shows the target number of days for review of planning projects by responding jurisdictions. It should be noted that only 16 of the 36 jurisdictions answered this question. Additionally, in our national studies of the development process, it is not unusual to find that jurisdictions do not actually accomplish the target dates they list. Of particular note for Long Island downtown development is the following:

- **Architectural /Design Plans:** 86% of these are targeted at 30 days or less, which meets or exceeds national standards and is consistent with best practice.
- **Site Plans:** 53% of these are targeted at 30 days or less, which meets or exceeds national standards and is consistent with best practice. However, 47% exceed 30 days, which is longer than desirable for site plan reviews.
- **Special Use Permits:** 71% of these are targeted at 50 days or less, which meets or exceeds national standards and is consistent with best practice. However, 29% exceed 50 days, which is longer than desirable for special use permits.

Review Time Tracking

Jurisdictions that want to shorten review times find that it is essential to both set targets for review times and then track performance related to the targeted review times. This is a best practice. Only 10% of the responding villages have established a system to track review time by staff, and 43% of the responding cities and towns do so. Jurisdictions that systematically track review time by staff include Babylon Town, East Hampton Town, Hempstead Town, Islip, Smithtown, Southold, Westbury, and Westhampton Beach.

Planning Commission/Planning Board Hearings

Since many applications must go before the Planning Commission/Planning Board, the amount of time between application submittal and the meeting date is important. In many jurisdictions, the commission meets only once a month, so a maximum of 50 days between an application submittal and the Planning Commission/Planning Board hearing is a useful measure. The Long Island cities and towns that responded to the survey meet the 50-day benchmark 70% of the time and the responding villages meet it 91% of the time. Overall, these are good timelines which should assist in downtown development. Best practice would have items going to the commission within 30 to 60 days of application time; nationwide, many jurisdictions exceed this best practice time.

H. BUILDING PLAN REVIEW

Building Plan Review Timelines

Table 8.

Review Times for Building Permits

	Number of Days					
	0-5	6-10	11-20	21-30	31-40	More than 40
New single family house	10%	41%	31%	10%	3%	3%
New multiple family building	4%	19%	41%	22%	7%	7%
New small commercial building	3%	17%	35%	21%	17%	7%
New large commercial building	0%	14%	17%	21%	28%	21%
Commercial tenant improvement	7%	32%	29%	18%	11%	4%
New mixed-use project	0%	11%	18%	18%	29%	25%

Table 8 shows the overall review time in calendar days for building permits in the Long Island jurisdictions surveyed. A comparison of these review times to best practices is provided below.

- **New multi-family building:** 63% are completed in 20 days or less and 85% are completed in 30 days or less. This is consistent with national experience. Best practices would complete 90% of these reviews in 10 to 15 working days or less.
- **New small commercial building:** 55% are completed in 20 days or less and 76% are completed in 30 days or less. This is consistent with national experience. Best practices would complete 90% of these reviews in 10 to 15 working days or less.
- **New large commercial building:** 52% are completed in 30 days or less and 79% are completed in 40 days or less. This is consistent with national experience. However, best practices would complete 90% of these reviews in 20 to 30 working days or less. These timelines could be of concern for downtown development.
- **Commercial tenant improvements:** 39% are completed in 10 days or less, 68% are completed in 20 days or less, and 86% in 30 days or less. While this is consistent with national experience, best practices would complete 90% of these reviews in 5 to 10 working days or less.
- **New mixed-use projects:** 29% are completed in 20 days or less, 47% are completed in 30 days or less, and 75% are completed in 40 days or less. This is consistent with national experience. Best practices would complete 90% of these reviews in 25 working days or less. These timelines could be of concern for downtown development.

Building Inspections

Table 9.

Timelines for Building Inspections

	Cities and Towns	Villages	All
Day-of or Next Day	9%	43%	29%
Within two days	36%	33%	36%
Within three days	55%	14%	29%
More than three days	0%	10%	7%

Table 9 shows the timelines for building inspections for Long Island jurisdictions that responded to the survey. All of the responding cities and towns require either two or three days, except for one town, Hempstead, which does day-of inspections. Forty-three percent of responding villages inspect next day (Bellport does next day or day-of) and 76% inspect within two days. More than three days are required for 10% of the villages. The national norm is for next day inspection and this is also best practice. Many jurisdictions use a 4 p.m. cut off time for next day inspections. Some feel that next

day inspections are not justified, since it may have already required several weeks to have plans approved. However, this fails to understand how building actually takes place. In some cases, a day's delay in inspection can actually shut down the job for a day or more. It is not always possible for the contractor to estimate when the job will be ready for inspection several days out. Additionally, if contractors are required to request inspections several days in advance, the job may or may not be ready for inspection when the inspector shows up. **We consider these slow inspection times a serious issue for downtown development on Long Island.** Additionally, Long Island has a peak building season and it is important to have efficient and timely inspections during that time. The responding jurisdictions that are doing next day inspections (or day-of inspections, as noted above) are Bayville, Bellport, East Hampton Village, Freeport, Garden City, Hempstead Town, Lake Success, Mineola, Roslyn, and Westbury.

I. ENGINEERING REVIEW

Table 10.

Timelines for Engineering Reviews

	Cities and Towns	Villages	All
2 weeks or less	17%	16%	16%
3 to 4 weeks	25%	42%	36%
	Cities and Towns	Villages	All
5 to 8 weeks	25%	32%	29%
9 to 12 weeks	33%	11%	19%
More than 12 weeks	0%	0%	0%

Table 10 shows the timelines for reviews of civil engineering plans. In the responding cities and towns, 67% are completed in eight weeks or less. However, 33% require nine weeks or more. In the responding villages, 58% are completed in four weeks or less and 89% in eight weeks or less. These numbers are similar to national experience. Engineering reviews vary substantially by type of project. Nonetheless, we believe best practice would have 90% of these reviews completed in 25 working days or less. Many Long Island jurisdictions are not aligned with best practices for engineering review timelines.

J. OUTSIDE AGENCY REVIEW

Table 11.

Outside Agencies Involved in the Development Review Process and Perceived Performance

Outside Agencies	Percent of Jurisdictions Indicating Outside Agencies Review Development Applications	Percent of Jurisdictions Indicating Outside Agencies Tend to Delay Review Process
Local Water District	43%	0%
County Water Authority	31%	8%
County Health Department/County Department of Health Services	89%	68%
County Fire Marshall	49%	32%
County Department of Public Works	71%	20%
County Planning Commission	91%	12%
State Department of Environmental Conservation	77%	44%
State Office of Parks, Recreation and Historic Preservation	29%	0%
State Department of Transportation	66%	44%

A variety of outside agencies are often asked or required to review development applications for Long Island jurisdictions. Table 11 lists the percentage of Long Island jurisdictions that have outside agencies review their projects. All of the agencies listed are not likely to be involved in each downtown project. It would be expeditious to have less need for outside agencies, but large numbers are not unusual throughout the country. **Outside agencies can be difficult to control and often can be the delay in approving development. The best practice is to attempt to reduce the number of agencies that must review a project and reduce the number of days they take for review. It is helpful if the cities, towns, and villages work closely with the outside agencies so that the agencies understand the local community needs.** We believe a reasonable target would be for all outside agencies to complete 90% of their reviews within 30 calendar days or 20 working days.

In addition to the outside agencies listed, respondents indicated that additional agencies review projects, including MTA-Long Island Rail Road, local fire departments, local park districts, and surrounding municipalities.

State Environmental Quality Review (SEQR)

Eighty-five percent of survey respondents characterize the SEQR process as either efficient or somewhat efficient, based on their jurisdiction's experience. Fifteen percent of responding jurisdictions characterized the process as somewhat inefficient or inefficient, and several respondents suggested improvements to the process in their detailed comments.

K. DEVELOPMENT REVIEW PROCESS: COMMENTS AND SUGGESTIONS

Ideas to Improve the Development Review Process

Respondents had the following suggestions for improving the development review process:

- **Technology:** Key suggestions included computerizing the process with software for processing, tracking, planning , GIS and the Web across all departments. This would increase IT staff needs.
- **Process Changes:** Suggestions included simplifying processes, using interdisciplinary teams, eliminating duplicate procedures, and reducing outside agency delays.
- **Staffing:** Many jurisdictions indicated the need for more staffing, including dedicated planning staff and plans examiners.
- **Zoning Codes:** Many jurisdictions see the need to revise their Zoning Code.
- **Boards:** Suggestions included having board members attend more continuing education classes related to planning and development, and adding planning boards in jurisdictions that do not have a planning board separate from their legislative body.

Processes That Work Exceptionally Well

Respondents indicated that a number of aspects of their review processes work exceptionally, such as work sessions to ensure smooth hearings, personal dialogue with prospective developers at informal pre-submission meetings, pre-application meetings with planning division staff, administrative site plan approval rather than Planning Board public hearings, interdisciplinary review teams, and planners and board members who are easily accessible to any applicant or member of the public with questions.

Appendix A

Background on Zucker Systems

Zucker Systems, created in 1982, is solely focused on projects related to streamlining the development review process and working with all related government departments. To date they have been responsible for conducting audits and studies in some 42 counties and 118 cities in 30 states plus the Cayman Islands, Washington, D.C., and Calgary, Canada. In 2008 they completed a review of planning processes in the 50 largest U.S. cities.

Based on their research plus experience managing these functions as governmental employees and contract staff, Zucker Systems has developed an in-depth knowledge about the functions they are analyzing and has created a “best practices” list of indicators.

Additionally, they have conducted national research on best practices, performance measures, and permitting and organizational methodology. They interact with Community Development departments throughout the U.S. and Canada via an interactive website. Paul Zucker is known nationally as the “Management Doctor.” His book, *The ABZs of Planning Management, Second Edition* is used by a number of universities as a text. His new book, *Mis-Management*, addresses management issues in cartoon fashion. He was also a contributor on the topic of management and leadership on ICMA’s recently released book, *Local Planning: Contemporary Principles and Practice*.

Zucker Systems believes that there is a difference between normal and maximum productivity in an organization. The need for major change in both public and private organizations is essential. Paul Zucker writes, “We are beyond the days of moving from one management fad to another. What is required today is a fundamental shift based on a changing environment and the new information and technology age. Our extensive studies and national contacts are a great assistance in relating to these shifts.”

It is recognized that each organization is unique and recommendations have been tailored for the particulars of Long Island’s situation. Decades of experience has provided Zucker Systems with a thorough understanding of best practices. However, all best practice features are not appropriate for each community and timing can be an important ingredient for implementation. This is particularly true as processes move toward the long-anticipated paperless office.

The structure of questions selected for this survey started with a general list of best practices compiled by Zucker Systems in 2009, which are listed below.

Best Practices for Development Review

1. Co-location of all development-related functions
2. Manager or coordinator of one-stop center
3. Attractive and functional waiting area and counter area
4. Good plans, policies, handouts and checklists—all up-to-date
5. Highly qualified front counter staff

6. Set and monitor counter wait times—10, 15 or 20 minutes depending on community
7. Electronic permitting system with good ties to GIS
8. Issue small permits over the Internet
9. Pre-application alternatives
10. Electronic applications and plan submittal via Internet
11. Early notice to stakeholders
12. Check plans for completeness at intake
13. Use of credit cards
14. Easy-to-understand fees based on actual costs
15. Full cost recover and enterprise type fund
16. Electronic permitting system
17. Through, fast and fair process
18. Electronic plan check and files
19. Inter-departmental review committee with decision power
20. Project managers who handle “cradle to grave” process with decision power—from pre-application to C of O
21. Performance standards for processing and plan check with weekly reports
22. Expedited review alternatives
23. Cut performance standards in half for each cycle of review
24. Meet performance standards 95% of the time
25. Track both government and applicant times
26. Comprehensive checks for the first review cycle
27. Consultants for overflow plans when performance standards cannot be met
28. Three strikes and you are out or increased fees after three cycles
29. Comprehensive email lists of all Stakeholders in the community
30. Good website, handouts, forms, staff listings, organization charts—all plans, policies and ordinances (see comprehensive check list)
31. On-line permit tracking
32. Electronic files at close-out (records management)
33. Interactive Voice Response and Internet inspection request systems
34. Next day inspections
35. Consultants when next day inspections cannot be met
36. Combination inspectors for residential and small TI's
37. Field computers and printers for inspectors
38. Developers advisory committee
39. Customer feedback and evaluation systems
40. Certified planners, engineers, plan checkers and inspectors
41. Stakeholder education sessions
42. Post-construction field review of projects re: quality issues

Appendix B

Best Practices Comparison for Downtown Development – Long Island Jurisdictions

Best Practice	Goal	Norm	Cities and Towns	Villages	Notes
COMBINED FUNCTIONS					
Best practice is to combine building and planning functions in one department. This allows for good integration of service and review of projects.	100%	This is the norm for smaller communities but less so for larger. The functions are combined for 38% of the 50 largest U.S. cities.	43%	78%	The percentages include jurisdictions that combine building plan review with planning, but not necessarily building inspection.
EFFORTS TO IMPROVE DEVELOPMENT REVIEW PROCESS					
Best practice is to complete a review of the development review process every 5 to 10 years. Downtown development projects have created the need for new approaches and processes, making development review process improvements particularly critical.	100%	National statistics do not exist for this item. Only a few communities meet the 5-year goal and we would estimate that only 25% meet the 10-year goal.	46%	10%	The percentages may include jurisdictions that completed a development review process improvement more than 10 years ago. The percentages do not include jurisdictions that completed only a partial improvement.
PLANS AND IMPLEMENTATION					
Best practice is to adopt and update a Comprehensive Plan at least once every 10 years. This is essential to set the vision for downtown development.	100%	Only a few communities meet the 5-year goal but many, we estimate half, meet the 10-year goal. We estimate that the norm is 15 years.	50%	19%	The percentages do not include jurisdictions with a Comprehensive Plan that was adopted before the year 2000 or was never adopted. Also, the percentages do not include jurisdictions that are currently updating their plans.
Once a Comprehensive Plan has been adopted, best practice is to update zoning regulations to be consistent with the Plan. This allows for Plan implementation.	100%	In some states, it is mandatory that zoning be consistent with the Plan. We estimate that nationally this is the case roughly 50% of the time. Of the 50 largest U.S. cities, 64% believe that zoning must be consistent with the Comprehensive Plan.	67%	67%	The percentages do not include jurisdictions with zoning ordinances that are partially consistent with their Comprehensive Plan.
DEVELOPMENT PROCESSING ENVIRONMENT					
Best practice is to have all development review staff located in the same building or within close proximity. Having staff co-located works well for the applicant, simplifies the review process, and provides easy access for citizens.	100%	Many cities and counties in the U.S. are creating so called "one-stop" centers for development approvals and permits. While this is a clear trend, we estimate that less than half have achieved this goal.	86%	86%	The percentages do not include jurisdictions with partially co-located development review staff.

Best Practice	Goal	Norm	Cities and Towns	Villages	Notes
Best practice is to have a single person or office that coordinates development review for all permits (building, engineering, fire, and planning).	100%	Planning applications are often assigned to a planner and building applications are often assigned to a building plan checker. Few communities have one person that coordinates building, engineering, fire, and planning applications.	43%	75%	
Best practice is for staff to use development review software. Electronic systems can improve efficiency, and they enable development review processes to be monitored.	100%	The need for plan review software increases in communities that have a high volume of permit activity and decreases for those with a low volume. Virtually all communities with a high volume have such software. Once communities move to electronic plan submittal, having such software will become essential.	36%	10%	
Best practice is to allow plans to be submitted electronically over the Internet. Virtually all plans today are created in electronic format. It is useful for applicants and their related professionals to submit plans electronically. Many of the professionals may live in different cities, so this becomes a major service. It is also more environmentally sustainable, reducing the amount of paper used.	100%	Only a few cities and counties have achieved electronic plan submittal but we believe it will become the norm over the next 5 to 10 years.	0%	14%	The percentages include jurisdictions that accept all plans electronically and jurisdictions that accept only some plans electronically.
Once plans are received electronically, they should be reviewed electronically. Best practice is for jurisdictions to mark up plans electronically and immediately share comments with other development-related departments.	100%	Although few communities have achieved this goal, within five years we predict it will become the norm.	23%	0%	Although a few Long Island jurisdictions indicate they review plans electronically, none of these jurisdictions accept electronic plans over the Internet.
Best practice is to accept payment for development review fees via credit card. The use of credit cards is a major convenience for customers. As electronic plan submission becomes the norm, it will be necessary for jurisdictions to accept credit cards over the Internet.	100%	Virtually all communities that accept applications or plans over the Internet also accept credit cards over the Internet.	21%	14%	The percentages include jurisdictions that accept credit cards in person but not necessarily via mail, over the phone, and/or over the Internet.

Best Practice	Goal	Norm	Cities and Towns	Villages	Notes
PLANNING DEVELOPMENT REVIEW PROCESSES					
Best practice is to provide development review applicants with an option to hold a pre-application meeting with key staff involved in the development review process. A good pre-application meeting can assist a community in securing the kind of development it wants and also reduce costs and timelines for the applicant.	100%	Most communities provide for a pre-application meeting at the applicant's request. Some communities require a pre-application meeting for certain (usually larger) types of projects.	100%	95%	
Development has become more complex and involves numerous specialists. Government can get these specialists to work as a team through inter-departmental review committees, which is a best practice.	100%	We estimate that over half of U.S. communities use inter-departmental review committees.	50%	25%	
If a community truly wants downtown development, it must be sensitive to applicants' need for timely approvals. A fast-track process can meet this need and most applicants are willing to pay any extra cost for the service.	100%	We estimate that nationally, only 50% of communities have a fast-track process.	93%	25%	The percentages include jurisdictions that have a fast-track/expedited review process for selected projects, not for all types of projects. The percentages also include jurisdictions that do not fast-track downtown development, but other project types instead.
Setting target dates for planning reviews is critical if a community wishes to shorten timelines and provide predictability for applicants. Setting target dates is a best practice. Long timelines increase the cost of development and may result in lower quality development.	100%	Timelines in many states are set by state law. However, these tend to be longer than best practice. We estimate that only 25% of communities set realistic timelines.	43%	20%	
Once target dates are set for application reviews, in order to achieve goals, the review times need to be tracked and reported in a transparent manner. Best practice is to systematically track review time by staff.	100%	We estimate that less than half the communities that set review times have a transparent process to report actual times.	43%	10%	The percentages include jurisdictions that systematically track review time by staff, but may not necessarily report review times in a transparent manner.
BUILDING PLAN REVIEW AND INSPECTION					
Building plan review should take place in a timely manner. Best practice is to complete building permit reviews for the following project types in the following number of calendar days:					
New multi-family buildings -- 20 days or less.	100%	2001 Municipal Benchmark ³ publication calculates that most cities meet a one-week target.	50%	71%	

³ *Municipal Benchmark: Assessing Local Performance and Establishing Community Standards*, 2001, by David N. Ammons, published by Sage Publications.

Best Practice	Goal	Norm	Cities and Towns	Villages	Notes
New small commercial buildings -- 20 days or less	100%	2001 Municipal Benchmark publication calculates that most cities meet three weeks or 21 days.	50%	58%	
New large commercial buildings -- 30 days or less	100%	2001 Municipal Benchmark publication calculates that most cities meet three weeks or 21 days.	50%	53%	
Commercial tenant improvements -- 10 days or less	100%	We estimate that a high percentage of communities meet this 10-day target.	22%	47%	
New mixed-use projects -- 30 days or less	100%	We estimate that a high percentage of communities meet this 30-day target.	30%	56%	
Once construction is underway, timely inspections are essential to keep projects on schedule and reduce construction costs. The best practice is next day inspection.	100%	This is one of only a few items that truly has a national accepted standard of next day inspection. We estimate that at least 75% of communities meet this standard. 2001 Municipal Benchmark publication calculates that most cities meet 1 or 2 working days after a request.	7%	43%	
ENGINEERING REVIEW					
Like planning and building reviews, it is also necessary to have timely engineering reviews. Best practice is to complete engineering plan reviews in 8 weeks or less.	100%	Once planning applications are approved, there is generally an engineering review of detailed plans. It is not unusual that these reviews require more than 8 weeks to complete. We estimate that only half of communities meet the 8-week target.	67%	89%	