Comments on Proposed Fees for Permits

#	Date	Comment
1.	3/8/2021	I recently read the proposed permit fees for GHI listed below. What is the breakdown as to how these fees will be utilized? What would be the need of the additional \$200, if that is refundable? What are these costs projected to cover? These are in addition to the fees paid to Prince George's County, as well? Thank you!
2.	3/8/2021	I would like to ask a question about the fee for the process of GHI permits. First of all, I agree with the idea of a fee for this kind of permit request. But it is not clear in the email the fee to be charged in a new addition permit request. What I understand from the text in the email is that, for example, I submit a permit for a new addition and the cost of this addition is \$100,000, I would need to pay a fee of \$1,500, from which I will get back \$200, so I would pay \$1,300. If this is correct, I think it is an excessive amount of money, since for the new addition I would need to pay also for the permits requested to the PGC and the City. I would like to suggest a cap for this kind of permit of \$1,000 that would be reduced to \$800 after the refund if I comply with the requirements from GHI regarding construction inspections. I'm asking this since in a paragraph below, it says that "except for a new addition and not exceed \$600 for a new addition" so I don't know if the previous bullet points have a typo or this last paragraph has the typo.
3.	3/8/2021	My husband and I agree with the proposed plan for permits. We think it is reasonable. On a personal note last year we started planning to get our porch screened in. We got a bid from a contractor who we knew had done work in GHI. He said he did not think we needed to get a permit. I clarified with GHI we did need a permit and told him. That was the last we heard from him. We are now looking around for another contractor for this project.
4.	3/8/2021	Just wanted to voice my support for the proposal. Seems reasonable that members who are getting work completed should pay for the staff time it takes to review permits, the refundable aspect seems like a worthwhile idea to get compliance, and the \$100 final cost also seems reasonable. My only concern is whether the refund model would create headaches for our accounting staff. I'd want to know that they think it wouldn't be overly burdensome. If it would be, then just charge \$100 and call it a day.

5.	3/9/2021	The proposed charges for processing permit requests look good to me.
6.	3/9/2021	I have the following comments with respect to the proposal to institute charges for processing GHI permits: * The proposed fees seem too high, even with a portion being refundable. We are already paying permit fees to the city and the county. * If the permit process is too costly, then perhaps the solution is to require fewer permits. Work performed must already be inspected by the county, which should remedy any safety concerns. * Newsletter Issue No. 518 states: "The Finance Committee considered that staff spends a considerable amount of time reviewing permits that only benefit the members who submit those permit requests." If it is indeed only the members who submit permit requests that benefit from the process, then is it the case that only members who submit permit requests are subject to any of the problems permits are intended to prevent? If all of the problems fall squarely on those submitting the permit requests, then do away with the permits. If the GHI as a whole faces negative consequences from removing permits, then logically it follows that permits are indeed a community benefit, and thus sharing costs is appropriate.
7.	3/9/2021	Four Comments: 1. Where does a bathroom going into a closet fit within the definition of addition? 2. I support the charging of a permit fee. 3. The cost of the fee is too much. For the following Reasons: a. For many members, it is a hassle to get one and so they sometimes skip it all together. This new policy will incentive that type of behavior. b. \$800 is too much for small/low cost additions. For example, I put in a 1/2 bath in my first floor closet, it was about \$14,000, so \$800 is too much for what was a very simple activity (if it was classified as an addition). c. The contract between the contractor and the member is a private matter. How will you know the costs? It would be easy enough to submit a fake contract for much less to reduce the 2% cost. 4. I suggest a fee schedule. Somewhat similar to the Fee for Service. Here are some suggestions, it does require more data, as to what are the most common permits requested and of course # of expected inspection visits by GHI staff.

a. Shed - \$50 b. Small addition - \$100 c. Large addition - \$300 d. Bathroom renovation - \$100 e. Kitchen renovation - \$100 3/11/2021 8. I have long been in opposition to the idea of charging members for using staff time for permits. I believe that the current proposal to do so is especially misguided and should not be adopted, for several reasons: 1. Won't fix the issue of unpermitted work. Although this scheme purports to address the problem of members and contractors engaging in work without obtaining GHI permits, it is more likely to cause the behavior—bypassing the Technical Service Department review—that it seeks to correct. Members might be tempted to do work, especially interior work that isn't readily visible, without obtaining GHI permits to avoid incurring the extra fee and hope that they don't get found out. I fully agree that the Technical Service Department's review and inspections are important safeguards and often save members money and heartache on their projects; the GHI review is also the best way to ensure that work doesn't negatively impact neighboring houses and structures. If this is truly the problem that the proposed fees are trying to correct, the fees are not the best mechanism to encourage members to comply with the requirements of review and inspection. 2. Is based on false assumptions about income and assets. One of the stated reasons during discussions of the policy to charge the proposed fees is that members doing work on their houses are the more affluent members and can afford additional fees. I have heard this assertion regularly made, but never accompanied by evidence to back up this claim. This policy actually unfairly burdens first-time homebuyers, people living in unimproved houses, or people on fixed incomes. A first-time homebuyer may have had to scrape together capital to get into a house, and has had to accumulate money over time to afford to make improvements or remodel. A resident on a fixed income might be building an addition to provide a

downstairs bathroom to age in place because they want to remain in their home and community rather than incur the costs of moving. A wealthier member might have been able to purchase a unit that has already been remodeled or has desirable features such as a downstairs bathroom or laundry room. Adding costs to a project will discourage people from buying in the community or remaining in the community.

3. Puts additional roadblocks in the way of members seeking to improve their homes and yards.

Members have expressed concerns at meetings and on social media that the GHI permitting process is burdensome and discourages contractors from working in GHI. Nothing in this proposal addresses member concerns about confusing rules, unwieldy bureaucracy, and significant time delays. The Technical Services Department works extremely hard to process permits and conduct inspections, but nothing in the proposed policy seeks to alleviate the burdens on this department by simplifying the process or hiring and training additional staff to make inspections and reviews.

Charging fees will lead members to expect fewer time delays and shortened time frames for permit reviews and inspections, but without related efforts

to address the burdens on staff, member discontent with the process will only increase.

4. Puts additional costs on members seeking to improve their homes and yards. Home improvements don't come cheap. Despite the socalled partial rebate, the additional fees will substantially increase the cost of small projects requiring permits such as fences, rain barrels, and sheds or indoor improvements, such as putting in a new floor in a kitchen or bathroom. The percentage-based fee for additions will push members to economize on the planning of and budgeting for an addition, perhaps by using lessexperienced contractors or lower-quality materials to keep costs down. This will discourage members from using green and environmentally friendly practices and materials, which may come at a higher cost. We should be encouraging members to use higher quality materials, more highly skilled

- contractors, and more environmentally friendly materials, as the work done on a GHI home becomes a part of that structure and increases the value of the structure, which ultimately benefits the cooperative as a whole.
- 5. Ultimately doesn't work as a revenue-generation **scheme.** If the hidden purpose of this fee scheme is to increase revenue for GHI, it will not work. The amount of money raised annually will be burdensome to individual members, but will not really help the cooperative's bottom line. The overall number of additions and improvements that can be made is a finite and limited resource in any given year. GHI has long discussed the idea of increasing revenue-generation opportunities by offering expanded fee-for-service or home improvement services after HIP is concluded, but this proposal will work against any such plans by damaging GHI's brand in the wider community. If the proposal discourages members from doing work on their homes, creates burdens on staff to administer, and creates ill will among the membership, it will not be worth the limited amount of revenue generated and could hurt the market for any expanded opportunities.
- 6. **Is based on a false premise**. Another argument that is made is that the membership should not pay for things that only benefit one member or a limited number of members. The cooperative routinely violates this principle in many ways, large and small—from maintaining parking lots when not all members receive a dedicated parking space to only reglazing a limited number of tubs every year to serving snacks at a board meeting. All members already pay to have a Technical Services Department, and so they shouldn't be penalized for using it, especially when the consequences of unlicensed or uninspected work is serious. The blind adherence to this principle of not benefitting one member at the expense of all could be seen by the membership as the opening salvo in an effort to reduce maintenance services or charge members for more and more services that now are covered by maintenance, especially if GHI does not reduce member fees accordingly.

I hope that the Board takes seriously members' concerns about delays in processing requests for permits and inspections, increased expenses for conducting home improvements, and about expanded bureaucratic hurdles that create member ill will; GHI should instead seek ways to simplify the process (with member input) and relieve the burdens on staff, especially the Technical Services Department.

9. 3/13/2021

I am writing to to strongly argue against the change the finance committee has suggested regarding the permitting process. This is exactly the wrong approach to address what is fundamentally a broken permitting process in the GHI. The number one reason people give for NOT entering the GHI, as well as for choosing to leave the GHI, is the nightmarish difficulty for getting a permit approved. It takes months and months of arduous phone calls, paperwork and wasted time to get most permits approved. I am about to submit a permit request to have a minor bathroom remodel done and have been advised that I should expect to wait 4-6 months for the permit to be approved. That is ludicrous. When I was looking to get quotes from contractors I had 3 different companies refuse to come out and give estimates once they realized I was in the GHI. The GHI permitting process is notorious and is a stain on the GHI reputation throughout the community.

The following statement from the GHI email is quite telling as to the basic mindset of GHi leadership towards its members: "The Finance Committee considered that staff spends a considerable amount of time reviewing permits that only benefit the members who submit those permit requests."

Every permit provided to a GHI member that goes towards improving and beautifying a GHI unit is a benefit to every member in the GHI. The GHI should make it a priority to revamp the permitting process so that it doesn't take months and months of back and forth between GHI members, their contractors and GHI staff to get a permit resolved. The fact that the solution the committee came up to this problem was to put yet another financial hurdle to the members is cynical beyond belief. The clear purpose of this fee is to discourage members from making any improvements by putting an onerous \$300 fee charge upfront. Yes the member gets \$200 back, but building an extra \$300 fee upfront, to members who are often on a

		tight income, will have a chilling impact on those trying to improve the state of their units.
		I am hopeful that there will be enough member responses to this proposed change that the GHI leadership will look to address the real problem here: the Bureaucratic nightmare that is our permitting process.
10.	3/13/2021	Greetings. Here are some thoughts about the permitting fees proposed by the Finance Committee.
		I can understand the rationale for instituting these fees. My first reaction is that they seem rather high, even with the refund of \$200, and likely to backfire by encouraging people to avoid the permitting process altogether by trying to make improvements "under the radar." I wonder if there aren't other ways of attacking the problem. I've been looking for more information but haven't found any are these permits required by GHI or are they required by the County or State? Are some of the GHI requirements really necessary and could they be dropped or simplified in ways that would free up staff time?
		I hope this is helpful.
11.	3/13/2021	I am writing in regards to the proposed permit fees I read about in the GHI E-News. I think the fee structure proposed is extremely high and will backfire, ending up incentivizing people to not get permits. In my own experience, I have needed permits for very minor things such as installing two rain barrels and a fence to enclose my garden side yard. I was not required by the county for any of these permits but under the proposed plan I would have had to spend an extra \$900 to only get back \$600 at some unknown time. The rain barrels cost between \$80 to \$360. The permits would have been more than the cost of the rain barrels which is just insane. To fence in the yard is pretty minor work and tacking on an expensive permit when I already have to go to a committee and board meeting for approval is beyond ridiculous. It would have had me honestly considering risking it and hiring someone willing to put in the fence without a permit. I wonder if there is going to be a proposed fine for not getting a permit and if it will be more or less than the actual cost of the permit. I am sure there are plenty more examples of minor home improvements in GHI that require a permit but it would be off putting to spend \$300 to obtain it. I also don't

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		understand how it was decided to charge \$300 for a permit and then give back 2/3rd of it.
		I can see if adding an addition or taking down a wall for an extensive remodel would require greater input from GHI. Therefore the extra man hours necessitate a fee for the permit but those are major projects. The fees should not deter people from maintaining or improving their homes. When I bought my house, I was specifically encouraged to remodel the bathroom because it was so dated and the plumbing and electrical needed to be replaced. Penalizing me with expensive permits to remodel the bathroom will just delay the work or force someone in position to hire people willing to do the work without a permit which ultimately doesn't benefit GHI.
		I strongly propose the board review what things absolutely require a permit and which do not, streamline the permit process, and charge fees for permits that do not discourage people from making improvements to their homes.
12.	3/14/2021	I do not have an objection to charging fees for permit requests. However, first, and most important, I believe that access and age-in-place improvements should be excluded from the fees. Second, I would expect the fees to go toward the total process and not just as an incentive for the member to follow through on inspection requests. One of the issues for members not following through is the response times for the entire permit and inspection process is frustrating and long. I would expect that our staff would have an adhered to, high level of expected turnaround-times so as not to discourage access, quality of life, and property value improvements to our homes
13.	3/15/2021	Dear Members of the Board: As a member of Greenbelt Homes Incorporated (GHI) and based on the Finance Committee recommendations for GHI permits I am submitting comments. I am entirely in favor of offsetting the current community cost of processing individual member permits by establishing fees. However, I believe the proposed fee for smaller projects is excessive.
		Here are my suggestions: 1. HOW fees are communicated matters! On facebook there is a long "conversation" regarding a \$300 permit fee

even though this is incorrect and misleading. It has caused a lot of unnecessary distress among some members. This should have been communicated as a "\$100 fee plus a \$200 fully refundable deposit upon completion/ final inspection approval of the project." This misunderstanding has now caused credibility issues with the proposal which will have to be corrected.

- 2. All members should receive a brief (15-20 minute?) courtesy, no- charge informational consultation/ review (on site if necessary?) to understand the process required for their proposed project. There should be a one- page dated form documenting the conversation. If the consultation reveals that the project is large rather than small scope, the \$600/2% fee rule could apply. If not, should the member decide to go forward, a more palatable processing fee should be charged. Why not \$75 with a \$75 or \$100 refundable deposit upon completion/ approval? Isn't \$75 the minimum hourly rate for fee for service?
- 3. And speaking of fee for service, why doesn't GHI offer to take on some of these projects (for example, installing footers or foundations for sheds)? This could serve as a source of additional revenue while ensuring adherence to code.
- 4. With regard to sheds and other detached structures, members who are inclined to avoid the permitting process need to better understand why permitting is necessary. There shouldn't and can't be DIY shortcuts to installation. I have seen at least one shed precariously balanced on cinder blocks waiting to collapse on a small animal or worse, a child and some so poorly maintained as to erase the visual benefits of the Homes Improvement Project (HIP). (Although appearance is important to our increasingly valuable properties, safety is paramount.)
- 5. If GHI is charging a fee there should be a time range commitment for processing submitted permits and explanations for any expected delays.
- 6. Members also need to understand that un-permitted/ DIY projects can and will affect their ability to sell as some of these improvements may be subject to (the cost of) correction prior to marketing.

14. 3/15/2021

I am opposed to the fees proposed for the permitting process. We already pay staff to process permits, so what

will this income be funding? Many members at some point have a need for a permit. Wealthier members of the coop will have no difficulty paying this, but for people of lesser income it will be just one more hurdle. We have to think about the entire membership and the major economic differences we have in the cooperative when we make these decisions. Otherwise, we are making improvements easier for members with more means and are increasing the likelihood that people will do work on their homes without securing a permit. Many people do it already, and this will ensure that more do.

15. 3/16/2021

Dear GHI Management Team,

I saw the email about the proposed changes in the permitting process. I am a new member of GHI, so I am not completely familiar with the current permitting process. However, I think a \$300 permitting fee is unreasonably high. Let's say that someone wants to make a minor improvement, such as adding or replacing an electrical outlet to the unit. The permit fee might even exceed the cost of actually hiring an electrician to do the work. This de-incentivizes residents from making needed improvements to their unit - including improvements (like replacing old outlets) that increase safety.

Another effect of this change would be that residents would circumvent the permitting system and make the renovations to their unit without any GHI oversight.

I also think that the fee structure is unfair to people who are on fixed incomes such as retirees or residents who may be unemployed at this time during the pandemic. For some individuals and families, \$300 is a lot of money, and most people don't have that sort of expendable cash. If a fee is initiated, I think it should be much lower and non-refundable - maybe in the \$25-50 range.

I'm wondering if there might be a way to streamline the process. One thought is that GHI could certify a list of contractors which have a good record of past work and GHI residents would be required to use these contractors. GHI only works with certain lenders on mortgages for GHI units, so why not have a similar system for contractors?

There might be other ways to streamline the permitting process to minimize the amount of time it takes to process the application.

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16.	03/16/202	Dear GHI, I understand the Finance Committee's rationale for instituting charges for some permits. However, I'm concerned about the proposal to charge \$300 for permits. Even if \$200 gets refunded at the completion of a project, some projects will not be completed for various reasons, and then the member will be out \$300 instead of \$100. Also, it's not clear to me whether charges are required for all GHI permits or only those classified as "II. X. Improvements, Alterations & Additions" in the member handbook. For example, would the charges be required for shed permits? We needed to get a permit for a deck box, since it was counted as a shed. But \$100 would be a gratuitously high fee to get a permit for a deck box which itself cost less than \$100. There are probably other minor additions/improvements that need a permit and shouldn't require a \$100 fee. These should be free or have fees on a sliding scale. Thank you for your consideration.
17.	3/16/2021	For context, I have gone through the permitting process twice. The first time, I wanted to get a plastic bike shed for my yard. The process took so long, that the shed sold out for the season, and I had to wait until next season. The second permit was for electrical work - mostly to resolve a safety issue of not having a dedicated AC circuit. I received that permit in a more reasonable timeframe, but it was difficult to coordinate between my electrician and GHI. Both parties refused to interact directly, and instead I was dealing with calls from both along the lines of, "well you tell him I said". I had three quotes for the electrical work. One was very cheap, and he obviously planned on cutting corners and even suggested avoiding the permitting process. The second was an electrician that is VERY familiar with GHI. His price was reasonable, but a few hundred dollars more than my third quote. The third offered about the same as the second, but for a bit less, so I went with him. Turns out, he wasn't as familiar with GHI and PG county as he had claimed and was a real pain to deal with despite doing good work. Point is, the electrician I would have liked to work with has to charge hundreds of dollars more, because he knows how long the process takes. Both experiences with the permitting process led me to have concerns that people would outright avoid the permitting process by either attempting to do the work themselves or by holding off on work that would improve safety (like my dedicated circuit). "staff spends a considerable amount of time" - I think there are better solutions to this issue than charging for permits (see below)

"permits that only benefit the members who submit those permit requests." As mentioned above, members attempting to do work themselves, holding off on safety-related improvements, or having uninspected work completed are ALL dangerous to their neighbors; because, for example, an electrical fire from an overloaded circuit is unlikely to stay confined to one unit. Also, improvements increase the value of the neighborhood overall and show that the units are well cared for -- again, benefiting everyone. We should be making the process as easy and accessible as possible for these reasons.

"Also, many members do not contact staff for the specified inspections and assign their contractors to act as their agents for the duration of the improvements. Some contractors do not contact staff for the inspections; hence, staff sometimes encounters construction defects after improvements have been made." - In my experience, getting a hold of GHI to schedule inspections was a nightmare. The only "defect" found was that I needed to caulk around a small hole. Otherwise, the inspector just checked and made sure the PG inspector passed it.

"Upon completion of the project including closing out all GHI permits, \$200 of the fee shall be refundable." I think holding money hostage will just compound the stress caused by an already (unnecessarily) stressful process.

Things that I think would actually save money without making improvements even harder to afford:

- Remove some items from the permitting list. The bike shed is a glorified plastic storage tote. I don't think it should be subject to a permit, let alone a \$300 one. Making these easier to get would definitely improve the overall appearance of the neighborhood. There is mixed information on whether or not permits are required for like-for-like improvements. Again, a permit seems excessive for a qualified electrician to come in and swap one light switch for another.
- Don't require a GHI inspection if there's a county inspection. In my experience, the GHI inspector just looks at the county inspection.
- Have a list of trusted contractors, who don't require as much review, or maybe are even exempt from the inspection process. This also provides incentive for those contractors to maintain good standing with GHI.

18. 03/17/202

Dear Eldon Ralph, GHI Manager

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I support the concept of charging a fee for permits, as permit review does take a lot of staff time, and is a service

provided to individual members, not the cooperative's members as a whole.

Not all services provided by GHI are used by all members, such as parking lot paving, which does not directly benefit members without an assigned parking space. Similarly, tree trimming of older trees in member's yards does not directly benefit members who have no trees. Most members understand that not everyone has the exact same needs, but the GHI permitting process has several unique features.

A permit request is initiated by a member, rather than by a decision of the membership through the elected BOD. The cost of GHI's permit review is difficult to budget for because this service is dependent on an unknown demand. A permit request initiates an open ended process that may involve quite a bit of back and forth, depending on the member's preparation and cooperation.

The cost of the time for staff to review and approve permits is most likely substantially more than most members imagine. Members might be interested to know the costs for staff to review different types of permits, which could essentially be considered a subsidy. Using a fee system keeps the monthly Co-op fee down as well.

There could be a drawback to the fee proposal, in spite of the fact that GHI would only recoup part of the staff costs for reviewing permits. The disincentive of paying a permit fee might inhibit some members from requesting a permit, resulting in an enforcement problem. Trying to work with a member "after the fact" is quite problematic since the improvement is already made, and the arguments to redo a poor job are more difficult for GHI to make.

The reasons for members to obtain permits could be emphasized more frequently, since it is hard for GHI to be aware of unpermitted improvements unless reported to or observed by staff. The cooperative could explain some of problems which members might inadvertently encounter without GHI review.

It is difficult to come up with easy ways to encourage compliance with permitting requirements. If improvements are made without a permit, the member should be retroactively responsible for obtaining official approval prior to selling the unit. The resale inspection

could compare permits in the unit's file with improvements. This idea could be problematic, but might have long-range benefits, as units are kept up to code over time.

Another way to encourage compliance with permit requirements would be to inspect for unpermitted exterior modifications, perhaps on a cyclical basis. But even the yard inspection program has irritated some members. Voluntary member compliance is generally how we expect the permitting process to operate.

If the fees are viewed as a disincentive to compliance, one idea might be to divide the proposed fees in half, but recoup the same amount. Charge two fees instead of one one permit application/review fee, and another fee for issuance of the permit. Small bites might be easier for members to swallow.

The proposed fee refund as an incentive for members to request inspections will most definitely increase compliance with that final step in the permit process.

So in summary, without hearing other points of view, I support the institution of a permit review fee, as proposed by the Finance Committee.

19. 3/17/2021

I am writing to object to the proposal to impose significant fees on members seeking permits. Rather than solve the problem of non-compliance, this illconceived proposal will encourage more people to avoid permitting all together due to financial constraints and an unwillingness to add hundreds of dollars (for larger project) to their costs. The GHI permitting process is broken, that is certain. Our addition permitting process last year took 7 months far longer than the City and the County permitting process. There is no indication that increasing permitting fees will improve the real problem, a broken and confusing process. Members Tom and Johanna Jones are submitting a counter-proposal, and I wholeheartedly support their proposal to reform the permitting process and reward compliance and fine non-compliance in the permitting process. My husband and I are against the proposed new fee structure.

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20.	3/17/2021	I hope this email finds you well! I think increased permit fees are a terrible solution that fails to address the root cause of permit complexity. I think the permit process should be reformed instead. I understand there is a member proposal on how to do that, and I support it. Don't increase permit fees.
21.	3/17/2021	Dear Finance Committee Members and General Manager Ralph,
		I'm writing to you voice my opposition to the new \$300-800 permit fees that have been proposed by the Finance Committee. While I understand how the Committee came to the conclusion to institute these new fees (to save staff time and increase compliance with the permit process), I believe these new fees fail to achieve these goals and instead cause more problems than they solve. My wife Sarah and I live in a three bedroom frame unit, and hoped in a few years to purchase a brick or large townhome unit. If these new fees are implemented we will likely move out of GHI instead, and furthermore actively discourage young families like ours from buying in GHI.
		by Tom and Johanna Jones (1C Woodland Way). The Finance Committee should review these proposed reforms and work through how they could be effectively implemented.
22.	3/17/2021	I am writing to say \$300 for a permit is onerous and out of touch with city and county permitting fees, even if you refund \$200 on a closeout inspection.
		The city charged me \$25 for my recent project and the county charged me \$110. I believe GHI should be somewhere in the \$25 to \$50 range, with maybe a \$100 refundable fee for closeout inspections if you want to go that route. More than that would have a chilling effect on homeowners who wish to improve their units.
23.	3/17/2021	I am writing in support of the proposal by Tom and Johanna Jones to an alternate approach to improving GHI permitting processes.
		We purchased our GHI home one year ago. We have been saving to renovate our kitchen to install a dishwasher and, hopefully, a second bathroom on the main floor. If the permitting process is as difficult as we have come to

understand from fellow GHI members, AND such large permitting fees are imposed, it will not be possible for us to do this renovation. This would be deeply disappointing.

I hope the Finance Committee and the GHI Board will do the right thing by its members. I too have been through a small permitting process and also found the website utterly incomprehensible and useless. I got answers and progressive's sonly when I directly emailed senior GHI staff, repeatedly, which probably ism't a great use of their time. I too have experienced confusion and conflicting information and instruction, and even just about repairs.

GHI is a wonderful place to live. We love our neighbors and the community. We are already doing our part to improve the areas around us and contribute. I hope GHI will continue to support us as much as we plan to support it.

24. 3/18/2021

I was involved in the process of getting a permit for an addition last year. I would like to advocate for providing a much more transparent process than what I experienced. There was no written information about the details required for the permit and the process dragged on and on. There should be a written checklist of what is required for a permit for a new addition.

I think a reasonable, partially refundable fee would make sense but should also include a time frame guarantee on getting the permit. My permit took 7 months and lots of calls from me and the architect to move the process along. I would suggest a tracking process with updates either by email or online to the permit applicant. There should also be built in accountability on the time for getting the permit. For example, if a permit takes more than 3 months, there is an automatic referral to a supervisor to determine the cause for the delay and feedback to the applicant.

The purpose of my addition is to make it possible for me to age in place by providing a bathroom on the main floor. I think that permit applications for age in place modifications should be 50% of regular permit application fees.

I am committed to improving my unit and contributing to this community. It seems to me that members should be encouraged to maintain and upgrade their units and that the permit/inspection process should be focused on encouraging the kinds of modifications that make units attractive places to live. High fees for permits for minor

improvements like light fixtures do not encourage members to upgrade their unit. Requiring permits to replace kitchen appliances is unreasonable because when you have a broken refrigerator and a family, it has to be replaced immediately. If there are GHI units where the electrical system does not support ordinary kitchen appliances, then that is a problem which GHI should remedy.

Decks and sheds must be replaced from time to time and the GHI permit system should support responsible maintenance, not make it difficult.

The purpose for permits and inspections is to maintain the high quality of GHI homes. Members will comply with a transparent system which supports their efforts to maintain an attractive, functional home.

Thank you for you attention,

25. 3/18/2021

Good morning,

I wanted to submit my comments related to the charges for processing GHI permits. I understand the permit process has been a bit frustrating for both members and GHI staff, I think especially because of the HIP and then because of COVID. I do think something probably does need to be done, I hear a lot of complaints on the process from fellow members, and I know when we submitted a permit for an addition back in 2016/2017, it did take a really long time. However, the process wasn't too bad a few years ago, and it sounds like it has caused more frustrations lately.

Based on what is outlined in the newsletter, I do not think the proposal for this fee schedule makes sense. There are many different types of permits someone may be submitting, and I do not know that volume for GHI staff, but charging \$300 up front for a permit where the work/item may actually cost \$300 or less, does not seem like a proper fee. One thing in particular I can think of is installing a shed. I can not imagine having to pay the same price as the shed and then in the end losing \$100 of that just for the permit. To me, people would be more inclined NOT to submit for a permit, and just do things without one. That probably happens already, and I think these fees would exacerbate that. And we do not want that as a community.

I do not disagree with some type of fee schedule for permits, especially for major improvements, where a permit from the county, WSSC, etc, might already be needed. Minor things just should not be included in this, unless the fee were something small like \$25. For additions, I do agree something could be put in place, because those do take up a lot of time, with multiple inspections and paperwork. However, the fees proposed also seem quite high. Maybe \$100 would be more appropriate, but \$800 or 2% seem excessive. Again, I think something can be put in place to assist with ensuring members put pressure on their contractors to do work correctly and adhere to the permit process. But, again, I think a high price may instead make people less likely to take out permits in the first place, or cut corners in some way.

I think we as members need to understand the main reasons behind this high fees (other than just to ensure people follow the rules). Is it because the costs of staff putting attention on permits and the process, and the money those hours are taking away from other things? Is the plan to hire/assign separate staff and this will help pay for their time? If not a major cost reason, then the fees are just really too high to justify.

We all think the process as a whole does need an overhaul in some way, but the fees proposed do not seem like the correct solution. If anything, I can see people going around the system and doing things on their own and then causing problems down the road.

Thank you for your time in reading my comments. I would appreciate more discussion/consideration into this matter. Maybe a discussion at our annual meeting would be appropriate.

26. 3/18/2021

GHI Board of Directors,

I would like to voice my strong opposition to the finance committee's recently published recommendation to begin charging fees for permits. While I believe the concept of encouraging our members to properly close out permits is necessary and benefits the entire cooperative, I feel the proposed fees will actually end up discouraging members from getting permits given the prohibitive costs.

The published proposal provides no evidence that a fee for each and every type of GHI permit would encourage members to obtain and properly close out a permit. A \$300 up-front fee to install a fence, rain barrel, or small deck will

only discourage members from applying for the proper permits. A \$300 fee for a permit to install a \$150 rain barrel is cost prohibitive for many members and quite honestly, completely out of line.

In its communications to members, GHI stated that proper permitting only benefits the member getting the permit. I could not disagree more with this statement. Permits and proper inspections on completed work not only benefit the member who occupies the unit, they benefit members in adjoining units who could be subject to flooding or fire damage from shoddy work, and they benefit the entire membership as we would all bear the costs of repairing potential damage to affected units.

The proposed fee schedule does not address existing permit backlogs or the often long period of time or tedious process to get a permit. If GHI needs additional staff to process permits, the Board should address that issue separately from any permitting fee proposals. The Board could further encourage proper permitting by simplifying and expediting the permitting process.

I support Tom Jones' recent permit reform proposal which he submitted to the Board. You may also view the proposal here.

Please do not allow the finance committee's permit fee proposal to advance further, as I feel it will be detrimental to our community.

27. 3/18/2021

GHI Board of Directors,

What follows is a form letter that I am using to express my immense concerns with GHI's proposed fees for permits. This is my 7th year as a member of the Coop, and have heard many horror stories from other members when it comes to the current permitting process; so much so that we are very reluctant to start any projects that would require permits. This concern, which I have now realized is shared by many, is only working to prevent improvements that would increase the value of properties within GHI and improve quality of life for those who choose to live in our aging homes. I vehemently oppose the establishment of a fee structure that would move even more of a burden onto GHI members, and believe that prior to imposing fees, GHI should establish and publish consistent and appropriate standard operating procedures for permits, timelines, and employee accountability.

[form letter begins]

I would like to voice my strong opposition to the finance committee's recently published recommendation to begin charging fees for permits. While I believe the concept of encouraging our members to properly close out permits is necessary and benefits the entire cooperative, I feel the proposed fees will actually end up discouraging members from getting permits given the prohibitive costs.

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I support Tom Jones' recent permit reform proposal which he submitted to the Board. You may also view the proposal here.

Please do not allow the finance committee's permit fee proposal to advance further, as I feel it will be detrimental to our community.

28. 3/18/2021

GHI management:

I have no problem with GHI members being charged some sort of permit fee to help cover admin. and logistics costs

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		for some projects, but should be in the 2 digits range (\$20 to say \$80) NOT in the 3 digits range (\$200 to \$800)!
		One hopes GHI would wish to have members improve and upgrade their units; <u>not</u> discouraging us with steep permit fees.
29.	3/18/2021	Dear GHI management:
		I read in this week's Greenbelt News Review (vo. 84 (17)) that GHI management is imposing a huge cost to permit fees for renovations, resale and other home improvements.
		As I agree to a cost to cover admin related expenses, I'm opposed to such a high increase resulting in the hundreds for any permit fee.
		As a member, I do not support this and will vote against it, if the members have the opportunity to do so.
		Please rethink this and keep it at a cost that is affordable.
30.	3/18/2021	GHI Board of Directors,
		I know you have already received this email many times already, but I also want to voice my strong opposition to the finance committee's recently published recommendation to begin charging fees for permits. Encouraging members to properly close out permits is necessary and benefits us all, I find the proposed fees will discourage members from getting permits and if anything, motivate work without permission.
		The published proposal provides no evidence that a fee for each and every type of GHI permit would encourage members to obtain and properly close out a permit. A \$300 up-front fee to install a fence, rain barrel, or small deck will only discourage members from applying for the proper permits. A \$300 fee for a permit to install a \$150 rain barrel is cost-prohibitive for many members and quite honestly, completely out of line.
		In its communications to members, GHI stated that proper permitting only benefits the member getting the permit. I could not disagree more with this statement. Permits and proper inspections on completed work not only benefit the member who occupies the unit, but they also benefit members in adjoining units who could be subject to

		flooding or fire damage from shoddy work, and they benefit the entire membership as we would all bear the costs of repairing potential damage to affected units.
		The proposed fee schedule does not address existing permit backlogs or the often long period of time or tedious process to get a permit. If GHI needs additional staff to process permits, the Board should address that issue separately from any permitting fee proposals. The Board could further encourage proper permitting by simplifying and expediting the permitting process.
		I support Tom Jones' recent permit reform proposal which he submitted to the Board. You may also view the proposal here .
		Please do not allow the finance committee's permit fee proposal to advance further, as I feel it will be detrimental to our community.
31.	3/18/2021	Totally agree with letter sent to management by Tom and Joanna Jones. To Totally against proposals to add ridiculous fees for improvements to homes.
32.	3/18/2021	GHI Board of Directors,
		Thank you for your service to our community. I am expressing my strong opposition to the finance committee's recently published recommendation to begin charging fees for permits. While I believe the concept of encouraging our members to properly close out permits is necessary and benefits the entire cooperative, I feel the proposed prohibitive fees will have an opposite effect of what is intended.
		The published proposal provides no evidence that a fee for each and every type of GHI permit would encourage members to obtain and properly close out a permit. A \$300 up-front fee to install a fence, rain barrel, or small deck will only discourage members from applying for the proper permits. A \$300 fee for a permit to install a \$150 rain barrel is cost prohibitive for many members and quite honestly, completely out of line.
		In its communications to members, GHI stated that proper permitting only benefits the member getting the permit. I disagree with this statement. Permits and proper inspections on completed work not only benefit the

member who occupies the unit, they benefit members in adjoining units who could be subject to flooding or fire damage from shoddy work, and they benefit the entire membership as we would all bear the costs of repairing potential damage to affected units.

The proposed fee schedule does not address existing permit backlogs or the often very long period of time and tedious process to get a permit. If GHI needs additional staff to process permits, the Board should address that issue separately from any permitting fee proposals. The Board could further encourage proper permitting by simplifying and expediting the permitting process.

I support Tom Jones' recent permit reform proposal which he submitted to the Board. You may also view the proposal here.

Please do not allow the finance committee's permit fee proposal to advance further, as I feel it will be detrimental to our community. Thank you.

33. 3/19/2021

Dear GHI Board of Directors,

We want to voice our strong opposition to the proposal of charging fees for permits, we are convinced that this is an ineffective way of solving a problem that is mostly caused by flaws in the current permitting system. We have been members of GHI since December 2016, and we already had frustrating experiences in the permitting process.

Charging fees for permits, even when partially refundable, will just discourage members from updating their units, and we all know how many units definitely need an update. Or, even worse, it will discourage them from seeking permits at all, and completing the work on their own without supervision, and ask for forgiveness later when/if it is found out.

The permitting process is currently slow, frustrating, and unclear. One major flaw is that finding reliable information online is impossible. Information is hard to find and, even when there, not reliable. The only way of getting (mostly) reliable information is to call the office, which results in an easily avoidable burden on the member and, especially, on the staff member. Updating the website should be a priority, and it would help ease the work of GHI staff members.

		I support the proposal Tom and Johanna Jones recently submitted to the board.
34.	3/19/2021	Dear Board, Management, and Finance Committee,
		I believe that charging fees will have the opposite of the intended effect and discourage members from full compliance with GHI inspection requirements.
		Staff time on reviewing permitting will increase as GHI housing stock ages. I recommend an expansion of the permitting department with more robust procedures which will benefit all members, any of whom may be seeking a permit in the future.
		If contractors acting as agents is the issue that can be addressed separately, for example not allowing contractors to act as agents, or an easier to navigate separate inspection list, or other ideas the staff or members could come up with.
35.	3/19/2021	Hello,
26	2/20/2024	It was recently brought to my attention to contact you regarding concerns about fees. I am truly invested in the Ghi community and would like to stay as long as possible. To do so, I have come to terms that adding an addition is necessary to my family needs. I have put so much money, improvements and heart into my GHi home. I'm in the process of applying for a bank loan to apply for a GHI addition and discovered that there a \$800 plus fee just to apply?!?! This is too much. I'm helping to improve a house that i don't even fully own and this obstacle is added? That doesn't make sense especially because I already pay GHI \$700 a month. Addition applications should be included in the coop fee or very minimal to say the least. I am very discouraged by this. Is there any way GHI could reconsider this policy?
36.	3/20/2021	I do not approve of the new permit fee proposal.
37.	3/20/2021	I'm writing to express support for the "Permit Reform" suggested by Tom and Johanna Jones.
38.	3/21/2021	I find it hard to understand why additional money is needed for all permit requests. Staff already has up to six weeks to process permits, and a salaried staff paid by member fees

to support this process. If the budget for the department is not sufficient than management needs to review what is going on in the department and determine if the permit process could be streamlined to minimize staff time and effort to approve a permit. If more staff time is required, it should be handled as part of the annual budget process, not by proposing a complex permit costing process that will require more staff time to manage. This is a cooperative after all. It would be different if the GHI permit were the only permit required, but county and city permits are required, and also have a not insignificant cost associated with them, and these permit processes require safety inspections.

In many cases the proposed fee may end up being as much or more than the cost of the maintenance or repair.

At the very least, these fees will become a disincentive to maintain and improve the cooperative's housing stock.

These fees will discriminate against members with less income (e.g. young families who rely on sweat equity to maintain and improve their homes, rather than having lots of available cash for extra permits, and retired members who can no longer do improvements or repairs themselves)

These fees will certainly provide more incentive for members to not obtain permits, and could result in an increase in liability to neighbors, and to the cooperative when work is not performed properly. Also GHI staff do not have the staff or the time to police whether members have obtained permits if the lack of staff time is an ongoing issue.

If a decision is made to require a fee, it should be much lower and non-refundable, perhaps in the \$25-\$50 range.

The proposal to add a permit fee for additions at such a high amount impacts families with children who struggle to save the money for additions and often require additions to remain in the cooperative and the community they love.

39. 3/21/2021

Recently, I saw that GHI was reviewing the permit process and asking for input from the members. I've been a member of GHI for 16 years, but recently moved to a different GHI home in August. My wife and I have

filed 7 GHI permits, of which 2 were also filed for a PG County and City of Greenbelt permit. I've worked closely with Stuart Caplan, the technical director and who is in charge of the GHI permit process on all of these. In my view, the problem with the current process is that it takes too long and is too cumbersome. This isn't surprising since GHI has 1 person reviewing the permit applications for everyone living in GHI, who must file for these permits including plans with required technical details that the average homeowner doesn't know. There is a wide range of home improvement projects that we need to apply for a GHI permit for, from putting a tile floor in your bathroom to building an addition to your house. It's my understanding that permits are handled in the order that they come in, so a request to tile a floor may take months as other permits that require more attention are addressed before it. Because this process often takes long and needs to be done which meets the requirements of GHI and PG County when applicable, homeowners are sometimes reluctant to do a home improvement project or do it without a GHI permit.

I agree that something must be done, but I disagree totally in the creation of GHI permit fees, especially in the \$300/job range! To address it, I think we need to look at the overarching goal.

My wife and I are the homeowners living in a co-op. The role of the co-op is to ensure that all of the homes are safe, nothing is done to devalue them and that anything that is done to one home has no detrimental effects on the other homeowners. Although I pay about \$2000/month in mortgage and co-op fees (\$24000/year and \$720,000 over the course of a 30-year mortgage), I am not the owner of my home in regards to filing for a PG County permit (GHI co-op is listed as the owner). If I want to make an improvement on my house, I need to file an application with GHI and possibly PG County and the City of Greenbelt. GHI is listed as the homeowner in the eyes of PG County permit process. This comes into play because as the homeowner, I can do certain projects myself and not require a licensed contractor to do them. I believe that GHI should encourage its members to improve their homes and make that process as simple and the least costly and time consuming. My recommendations to help alleviate the problems and improve this process are:

1) Develop a tier system for the permits

GHI should develop a webpage for the permitting process for its members which would include a list of improvements and which category they are in, and links to permit application for either a minor, moderate or major repair. The website should include template plans for projects and requirements (such as stud width or how many electrical outlets per linear foot are needed etc). This way the member doesn't have to try to draw up a plan on his/her own with no guidance. It will also give the members ideas of how they may improve their property such as building a deck on your back porch. Keep in mind that these are all improvements and should be encouraged;

they will make people's homes and the whole community nicer, improving the quality of life for all its members.

- a) Minor improvements: these are projects like tiling the bathroom floor which require no building or electrical permits from PG County. My opinion is that GHI should give its members the authority to make these minor improvements without filing for a GHI permit, but in lieu of that, file a permit just notifying GHI that the work will be done. Date stamp it, send it to the minor improvement request folder, look it over, and if all is ok, just click OK and it's done. Send out an email to the member. These requests don't necessarily have to handled by the GHI technical director.
- b) Moderate improvements: these are projects such as building a closet. They require plans and need to be done according to the PG County code and may require PG County building and/or electrical permits to install an outlet and make the studs the right distance, etc. These would be sent to the moderate improvement. The permit requests will usually have to go to the technical director for approval to ensure the requirements of the codes are addressed. Since there aren't as many technical issues addressed, these can be signed off on relatively quickly and the approval letter and GHI permit sent to the member.
- c) Major improvement: these are things like additions which require detailed drawings addressing various code requirements. The GHI technical director (or some knowledgeable person authorized by GHI) needs to

review the plans before they are sent to undergo the PG County permit process. These will take more time since there are so many details, but there probably are less of permit request for major improvements than for minor and moderate ones. So, if the minor and moderate ones take less time to address, there will be more overall time to address the major ones.

Following the permit process is the inspection process. Again, GHI has 1 person (the GHI technical director) who does the permit inspections, usually coming out at least 2x to inspect (initial and final inspection). This doesn't take very long, but since it is another task that the GHI technical director must do, it takes him away from addressing the permit requests. My suggestion is for GHI to assign one other person(s) to handle these less-than-expert needed tasks to free up the GHI technical director.

I believe we can make this process faster and more efficient while maintaining GHI improvement standards. This will provide the tools and knowledge needed for homeowners to navigate the process, encouraging homeowners to make improvements to their homes which will improve the quality of life for themselves and the community. Implementation of the proposed GHI permit fee system will only be detrimental to everyone, discouraging homeowners to make improvements on their homes.

40. 3/21/2021

I am strongly opposed to charging any fees for GHI permits.

The proposed fees will discourage people from getting permits and result in more members doing work on their units without GHI's knowledge. This behavior has caused serious problems for GHI in the past, so I do not understand why the board would want to adopt a policy that is likely to make the problem worse.

Permits are necessary to ensure that any work done in shared buildings is done in a safe manner that does not put our infrastructure at risk.

Because of this, permits benefit all members, not just the person applying for the permit. We live in shared buildings and our homes are not independent of each other. Unpermitted work could result in increases in our insurance premiums -- a cost that will be borne by the entire membership. Under-the-table modifications can affect the

		structural integrity of a building, not just one member's unit. Unknown alterations in a yard run the risk of creating drainage issues that may affect a building's foundation and put every member in the row at risk. Members already pay for the Technical Services Department through our monthly co-op fees. Charging additional fees for a permitting process that is necessary for the safety of our buildings and integral to our ability to improve our homes for future generations is contrary to basic co-operative principles. The proposed new policy represents a significant shift in the relationship between GHI and its members. If the board is insistent if pursuing this folly then I believe the proposed changes needs to be approved by a membership vote first. Such a large change in the co-op's philosophy
41.	3/22/2021	should not be decided by the board alone. You have got to be kidding. The fees are outrageous \$300 to replace a \$100 light fixture. Who thought that was a good idea? Anyone can see how this will play out GHI Management needs to remember that you folks work for the MEMBERS. The MEMBERS do NOT work for GHI. In these difficult times someone that doesn't even live in GHI thought this was a good idea. As my younger friends would say WTF??
		I have lived in GHI since 1972 and have never been more disgusted with maintenance. Why someone on your staff would give a key to my house to a contractor defies logic. That said contractor sprayed for roaches that I haven't seen in decades defies logic. Thank your lucky stars that I'm not allergic. This egregious situation happened after I specifically said I did not want anyone in my house if I'm not home. When I went in person to speak to someone I was given the old standby excuse "I wasn't here last week". No wonder people change their locks and don't give GHI a key. Just do your damn jobs and if you can't or don't want to
42.	3/22/2021	The proposed fees seem excessive and large enough to discourage people from seeking permits for work. Although I appreciate the importance of recouping at least part of the cost of processing the permits, it is important not to set the fees too high. If members fail to

get final inspections, that can surely be dealt with separately. Permits and inspections are mutually beneficial to the cooperative and to members.

If a permit is advertised as refundable, a higher percentage should be refunded.

I believe that we have always complied with permitting requirements for our addition and other work that we've had done. If, as has been alleged, permits are required to replace faucets and refrigerators, the proposed fee structure becomes ridiculous.

43. 3/27/2021

I am strongly against the proposed fees for GHI permits. Charging more for a GHI permit is not the solution. We already have members who don't do things "by the book" and the increased fees will likely cause even more members to attempt to bypass the permit process. Word of mouth from neighbors and friends seems to reinforce the idea that permits are a pain and they take too long to get approved. (Check Unofficial GHI Facebook page, if you aren't familiar with these conversations.) This discourages members from being above board and causes GHI all kinds of problems. Why charge the people who are following the rules, when some of the most time consuming issues are caused by the people who don't follow the rules?

It seems that GHI management and the Board of Directors needs to evaluate why the permit process appears so discouraging to members. Is it easy to find out which improvement/renovation/replacement/new construction requires a permit and what does not? Are requirements for permits straightforward and clearly stated? Are all application forms easily available and up-to-date? Are there too many rules that require permits? Are staff overworked and need help? Without an evaluation, how can a solution be found?

Furthermore, I disagree with the concept that members who make improvements to their units should be charged for the staff time to process their permits. GHI requires permits for an array of circumstances from installing fences to building additions. Staff process these permits and ensure that members adhere to GHI rules. The improvements to individual units enhances the monetary value of the property, and thereby contributes to the overall value of the community. If we all jointly own all of

the cooperative, then, we all benefit from these improvements.

What is the point of this fee proposal anyway? If it is to better track completion of projects and final approval, then adding expense to members will not improve the permit process. It will increase the burden of permit administration (tracking permit fees and reimbursing members), thereby increasing staff time to review and issue permits, adding more delays and complexity to an already lengthy process.

This punitive permit fee proposal makes no sense. I believe that it will: discourage members from making improvements to their property due to added expense; make GHI less appealing to prospective buyers (especially those who hope to remodel or make improvements); encourage members to circumvent the permit process; be more burdensome to staff and members; and cause additional delays and complexity to the permit process.

44. 3/28/2021

GHI Board of Directors and Members of the Finance Committee,

I would like to voice my strong opposition to the finance committee's recently published recommendation to begin charging fees for permits. While I believe the concept of encouraging our members to properly close out permits is necessary and benefits the entire cooperative, I feel the proposed fees will actually end up discouraging members from getting permits given the prohibitive costs. I also feel that this proposed fee structure is not in the spirit of the cooperative, would disproportionately affect members already financially affected by the pandemic, and is not inclusive in nature by increasing the financial burden of improvements that are necessary to keep homes livable.

The published proposal provides no evidence that a fee for each and every type of GHI permit would encourage members to obtain and properly close out a permit. A \$300 up-front fee to install a fence, rain barrel, or small deck will only discourage members from applying for the proper permits. A \$300 fee for a permit to install a \$150 rain barrel is cost prohibitive for many members and quite honestly, completely out of line. Even considering that \$200 of the fee would be refunded after the project is completed, many residents don't have the disposable income to afford the permit.

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		In its communications to members, GHI stated that proper permitting only benefits the member getting the permit. I could not disagree more with this statement. Permits and proper inspections on completed work not only benefit the member who occupies the unit, they benefit members in adjoining units who could be subject to flooding or fire damage from shoddy work, and they benefit the entire membership as we would all bear the costs of repairing potential damage to affected units.
		The proposed fee schedule does not address existing permit backlogs or the often long period of time or tedious process to get a permit. If GHI needs additional staff to process permits, the Board should address that issue separately from any permitting fee proposals. The Board could further encourage proper permitting by simplifying and expediting the permitting process.
		I support Tom Jones' recent permit reform proposal which he submitted to the Board. You may also view the proposal here http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/?fbclid=lwAR2TMFs4jlJyKB3 http://spril.com/PermitReform/

During my recent experience I found little of value in the permitting process - either by GHI, Prince Georges County, or Greenbelt. Each office caused massive delay -- partly due to COVID -- but also because the entire process is overly cumbersome. If there was concern for my doing the job correctly or making sure the right people were contacted or some kind of information to guide me through the process, then I might be open to a modest fee. But my recent experience showed me that the permitting process is simply overly bureaucratic, mismanaged, and consists of a bunch of "gate-keepers" who only care about maintaining the process and have little concern for my home. But GHI wants to levy massive fees and I will still have to pay for the Prince Georges (\$311) and Greenbelt city (\$50) permits - who actually still we be doing inspections and requiring other permits for electrical and water inspections. Paying \$800 for GHI for what was provided for my addition is absurd, it is an insult after paying my GHI fees for 25 years for -- presumably -- the management of the GHI homes - including the occasional permit request from a member. 47. 3/28/2021 I offer the following comments regarding the proposal: 1. It would have been helpful for the Finance Committee to explain how the recommend fees were arrived at. At first glance, the fees appear high, but no information is provided regarding the labor costs associated with permit reviews by GHI staff. 2. How do the proposed charges compare to permit fees established by the City of Greenbelt and Prince George's County? 3. What additional effort would be expended by Finance Office staff to keep track of the permit charges and refunds? Was this additional effort taken into account by the Finance Committee in proposing the charges? 4. Would a separate account need to be set up to keep

track of the charges and refunds?

		5. Would the costs of the additional Finance Office effort outweigh the benefits of charging for processing permits and issuing refunds? Thank you for considering my comments.
48.	3/29/2021	Hello, As a low income member of the GHI community, I oppose the amount of \$100. as the non-refundable portion of the proposed fee for processing a permit request(that is not for an addition). I have submitted two permits since moving to GHI in Dec 2018. Stuart has asked me twice (after I have emailed him about something else) if he could inspect my shed(one of my permits). I said yes, twice. He still has not come out and done the final inspection. So, it is not the fault of members for the final inspection not getting done, is what I am saying here. I want to submit a permit soon to widen the door opening to one of my closets in the bedrooms. I will be doing the work. I do the work myself when I can, to save money. I built my shed. I think \$100 is excessive for a permit to simply widen the door of a closet. Perhaps have a larger range of fees for permits. And if this is truly just a "motivational" fee, then refund the whole fee. Who are the staff that spends so much time reviewing permits? This sounds like an excuse to get more money from members. I especially oppose it because I imagine most of my permits will be for relatively small changes, as I cannot afford a complete kitchen redo for example. Why should I be penalized for making changes incrementally as my income allows?
49.	3/29/2021	I am submitting a strong disagreement on the recently published recommendation to institute permit fees. The published proposal gives no evidence that a fee for each and every type of job requiring GHI permits will encourage members to apply for and satisfactorily complete a permit. Are members willy-nilly applying to GHI for permits and not completing the work? If anything, a fee to install a fence, a rain barrel or a small deck will only encourage members to not get permits at all, putting the entire co-op at risk for shoddy work.

The idea that only a single member benefits from permitted work is ludicrous, as every member benefits from the Coop's well-maintained units.

The proposed fee schedule does nothing to address whatever permit backlog exists, a backlog that is not defined in the proposal. The bureaucracy and inefficiency of the process exists due to the co-op structure (submit to staff, who forwards to Committee, who recommends to the Board), something that will not change with this fee policy.

I endorse rhe proposal outlined by GHI member Tom Jones which he submitted to the Board. You may also view the proposal here, http://spril.com/PermitReform

Please do not allow the finance committee's permit fee proposal to advance, as i feel it would be detrimental to our community.

50. 3/29/2021

I agree with GHI's Board of Directors and Finance Committee's recommendation to charge an up-front fee for processing permit requests for improvements. I agree with the following sections of the Finance Committee's rationale for recommending the up-front fee for processing permit requests:

- 1. Staff spend a considerable amount of time reviewing permits.
- 2. Many members do not contact staff for the specified inspections and assign their contractors to act as their agents for the duration of the improvements. Some contractors do not contact staff for the inspections; hence, staff sometimes encounter construction defects after improvements have been made.
- 3. A refundable inspection fee may motivate members to comply with the GHI inspection process. I disagree with the following section of the Finance Committee's rationale for recommending the up-front fee for processing permit requests:

"permits . . . only benefit the members who submit those permit requests."

I recommend this statement be deleted from the rationale for recommending the up-front fee for processing permit requests because, if the permitting process is implemented properly, including review by the Architectural Review Committee when appropriate, all "improvements" increase the value of the unit receiving the "improvements" as well as increase the value of the neighboring units. If the

permitting process accomplishes its goal, the neighboring units experience no immediate detrimental effects resulting from their neighbor's 'improvements" and benefit in the long run by a boost in the average market value of their units at the time of resale. If the "improvements" cause detrimental effects, immediate or at time of resale, then the "improvements" should be declined a permit so that this is prevented.

I disagree with the following highlighted details of the Finance Committee's recommendation "... that GHI institute the following charges for processing permit requests:

- \$300 for any GHI permit except for a new addition.
- \cdot In the case of a new addition the greater of \$800 or 2% of the cost for a new addition.
- · Upon completion of the project including closing out all GHI permits, \$200 of the fee shall be refundable. With a refund of the \$200 fee upon completion of a project and closing out a permit, the actual fee would be \$100 for any permit except for a new addition and not less than \$600 for a new addition."

The rationale for changing the highlighted sections above is that up-front fees that are set too high and include a portion of the fee designated as non-refundable may have unintended consequences that function counter to the Finance Committee's rationale for recommending the fee for processing permits, "A refundable inspection fee may motivate members to comply with the GHI inspection process."

- 1. I recommend the up-front fees be low enough that a member is not motivated to avoid entering the permit process. High fees may motivate some members to choose instead to make the "improvements" without informing GHI staff, hoping they can make the "improvements" without GHI staff being aware of the construction and therefore avoid the high fees. A low fee will be less likely to result in this unintended consequence.
- 2. I recommend the entire fee be refunded once the member follows through with the permit process, including the scheduling of the final inspection by GHI staff for the same reasons listed above (#1). The intent of the fee is to "... motivate members to comply with the GHI inspection
- process." A non-refundable portion does not satisfy this or any of the other rationales listed by the Finance Committee.

		3. I recommend a flat fee of \$100 for any "improvement" that requires a permit and that the fee be fully refunded to the member upon completion of the process.
51.	3/29/2021	I understand the need for members to make renovations to their houses correctly and safely. I also feel that imposing high permit fees will not only compound the problem but will prohibit anyone who wants to make improvements on strict budget. "Partial refunds" are not enough incentive when the upfront fee is already too high. You will be discouraging those of us who want to make improvements the right way and allowing others who would not "follow the rules" anyway to continue to do so. There's got to be a better way. The answer to every situation shouldn't always be to just charge more money! Thank you.
52.	3/29/2021	Dear GHI Board of Directors,
		I would like to voice my strong opposition to the Finance Committee's recently published recommendation to begin charging fees for permits. While I support encouraging GHI members to properly close out permits for the benefit the entire cooperative, the proposed fees are likely to have the unintended consequence of discouraging members from obtaining permits and instead undertake projects without permits.
		The problems with the proposed fees are twofold: first, there is no evidence that charging a fee for GHI permits would encourage members to obtain and properly close out a permit. The fees do nothing to address staffing issues or long and complex permit applications which require multiple conversations with staff or multiple revisions/additional documentation. These issues should be addressed by providing the GHI membership with clear workflows (e.g., who review the permits and is Boardreview required, etc.), and more precise time estimates for each type of permit. Using Permit Type II as an example, the timeframe provided is 20 days to 8 weeks — quite the variance, particularly if one must hire contractors to complete the work. Instead, GHI staff could develop simplified online/interactive permits for certain common items, such as rain barrels or sheds that include sample drawings or recognize common brands rather than the current PDF version. GHI should investigate an online system where members could track the progress of their
		permits and upload drawings or documentation. This would reduce staff time spent on "simple" permits, allowing more

time for more complex items such as additions or remodels.

Secondly, a \$300 up-front fee to install a fence, rain barrel, or small patio is cost prohibitive and will only discourage members from applying for the proper permits. A \$300 fee for a permit to install a \$150 rain barrel is nonsensical. Even considering that \$200 of the fee would be refunded after the project is completed, many residents do not have the disposable income to afford the permit. Furthermore, there is no acknowledgment of GHI's responsibility regarding permits. What happens if the delays are GHI's fault – will the member receive a complete refund if the permit is delayed beyond the designated review timeframe? The proposed fee schedule does not address existing permit backlogs or the long period of time or tedious process to get a permit. If GHI needs additional staff to process permits, the Board should address that issue separately from any permitting fee proposals. The Board could further encourage proper permitting by simplifying and expediting the permitting process as noted above.

In its communications to members, GHI stated that proper permitting only benefits the member getting the permit. I fundamentally disagree. Permits and proper inspections on completed work not only benefit the member who occupies the unit, they benefit members in adjoining units who could be subject to flooding or fire damage from shoddy work, and they benefit the entire membership as we would all bear the costs of repairing potential damage to affected units.

Finally, I support Tom Jones' recent permit reform proposal to the Board. You may view the proposal <u>here</u>.

3/29/2021

Dear GHI Management & Board,

As a Member of GHI for nearly 20 years now I urge the **Board to reject the Finance Committee's recommendation** that GHI institute charges for processing permit requests, noted below for reference:

- \$300 for any GHI permit except for a new addition.
- In the case of a new addition the greater of \$800 or 2% of the cost for a new addition.
- Upon completion of the project including closing out all GHI permits, \$200 of the fee shall be refundable.

53.

These proposals will discourage Members from investing in GHI. Some might leave rather than build the addition that would enable them to have a family or live all stages of life in GHI, or update that kitchen. Others might attempt alterations *covertly*, including plumbing and electric (!). Charging fees for renovations, especially additions, is based on a flawed premise that *only the Member benefits* from them. It fails to recognize that additions and other elected renovations are legacies made by Members - at their expense, not GHI's - that will benefit GHI itself long after a Membership ends.

Such improvements help to maintain GHI's desirability and relevance in an increasingly competitive market of housing, from hipster neighborhoods in DC to vibrant, walkable communities nearby, including Hyattsville and Silver Spring. They expand the variety of GHI homes which broadens GHI's appeal to a larger, more diverse population. This in turn increases our community's ability to keep Members and attract new ones.

Among GHI's many qualities is the current balance of flexibility and limits by which Members can increase the size of their GHI home from a small home to one that is still modest but large enough to raise a family, or have aging loved ones live at home.

Besides additions, adding a bathroom or upgrading a kitchen can be essential to remaining in GHI. The proposed charges also add another layer to the

permitting process – and the refunds, *yet another!*Many of us are here because we love the community. Most of our rules protect GHI and its Members from shoddy contractors, or attempts by Members to perform home improvement projects by themselves.

GHI's rules direct our Members to care for our homes, yards, and sheds. It is therefore important to foster an atmosphere of respect for our rules – and this succeeds when the rules benefit both *Members and community*. Policies that impose pure burden on Members will compromise respect for our other rules, as well as reduce morale and enthusiasm in the community.

Adopting these or *any* charges for GHI permits is likely to do just that. In fact, *they already have.*

News of these proposals has provoked mockery, complaints and anger towards GHI and "all its rules," verbally and in writing, from numerous Members. I have read and heard more of it lately.

The fees will diminish GHI's appeal from within and without. Convincing friends, family and others to consider

GHI will become more difficult. Word of mouth is important for GHI, as you know. Whatever the spirit in which these proposals were developed, they will, in reality, punish Members for tailoring their homes, at their own cost, in order to remain in GHI. Members have already been struggling more, with recent increases in monthly coop fees. However, the increases are worth it – as it is by these increases that GHI was able to execute HIP without resorting to a loan – an impressive act of which to be proud, and from which GHI Members will ultimately benefit. Most sensible Members understand the need for the fees currently in place. That said - There is growing "fee fatigue" here in GHI. The proposed permit fees/charges are offensive and gratuitous. These fees will inflict a psychological liability upon GHI. They are provocative, and could be the "last straws" for some Members, whether or not they can afford them. They will exacerbate adversarial attitudes between Members, the GHI Board, GHI Staff, and GHI itself. Please reject all of these proposals, for the sake of GHI, GHI Staff, and all of us who are GHI. Meanwhile, I urge the Board to solicit ideas from Members about how to streamline the permitting process. The real solutions are not always the most obvious. And the obvious, not always real solutions. Thank you for your consideration and service. 54. 3/29/2021 I am writing to object in the strongest possible terms to the proposed charges for GHI Permit Processing. Given the fact that permits are required for even the most trivial construction, such as an 8' x 6' privacy screen, the cost of permitting could easily exceed the cost of construction. Such an exorbitant fee would effectively serve as a deterrent to Members making even modest improvements to their homes and grounds. The proposed amount is ridiculous. GHI benefits from Member's improvements to their homes at no cost to GHI. Improvements ultimately increase the value and sale prices of our shared property, and should be encouraged, not punished. These fees won't do anything to help GHI, and will only anger members. Please reconsider this ill-conceived,

punitive proposal.

55.	3/29/2021	I'm writing to comment on the Finance Committee's recommendations to institute permit fees on all GHI improvements. Although I understand the need for measures to ensure that construction is done effectively and to code, permit fee do place a burden on our lower income members to make improvements on their homes and it's important that GHI be an inclusive community. One compromise that I propose is that the fees be 100% refundable, or at the very least 75% refundable. This can ensure compliance without penalizing people who are looking to upgrade their homes. Thank you for your attention to this matter.
56.	3/29/2021	Dear GHI Board Members and Staff,
		I am writing to oppose the proposed rule instituting prohibitive permit fees for GHI members' alterations and additions. I have engaged in conversation with a number of members of our cooperative who feel that these new fees would be detrimental to improving GHI units. Members already put out considerable financial outlays to improve their units. In doing so, the members improve not just their units, but our community as a whole. In addition to the added amenities and architectural improvements these projects add, these undertakings make our community much more marketable as a place to live, thus encouraging new people to consider joining our cooperative. I support finding a non-financial way to reducing the time and energy GHI staff put into processing permits. I think the proposal put forth by members Tom and Johanna Jones have some very good ideas for the Board to consider in lieu of the permit fee proposal. The new fees will discourage members from making improvements, and encourage them to leave our community for more optimal living situations. The stability of our community will thus deteriorate. I am sure that the creative minds of GHI's board members and staff can find more creative ways to streamline the permit process to reduce staff's time and energy in this area. Thank you for all that you do for our cooperative and its members.

57. 3/29/2021

I am writing to submit comments regarding the proposed permit fees structure.

As a GHI member, I strongly object to the imposition of steep permitting fees. The proposed fees will discourage members from complying with the permitting process, or from making improvements which would benefit the community altogether.

I agree wholeheartedly with the comments submitted by Tom and Johanna Jones and want to echo their thoughts with some of my own:

- These permitting fees strike me as extremely high.
 Many improvements cost only a few hundred dollars to begin with, such that \$100 is costly, and the \$300 up-front is a significant deterrent to making any improvements.
- We already pay GHI to handle permits and other issues. I feel that this is an unfair effort to get more money out of a process that we already pay GHI for and which GHI has failed to manage properly.
- This fee structure will lead people to try to make improvements that would normally require a permit without consulting GHI, even more than currently takes place.
- The permitting process should be completed primarily on standardized forms and submissions through the website, rather than through emails and phone calls to GHI employees to clarify the rules.

I hope that rather than implementing this unnecessary and burdensome fee structure, GHI will instead invest the time and funds necessary to develop a system that actually works. Such a system should clarify what permits are needed for and what is necessary for approval, reduce the long waiting periods in the current permitting system, and reevaluate where permits are necessary. Members should be trusted to make minor improvements; permits should be for only major projects, and fees should be used punitively, not presumptively.

I ask that you closely read and consider the Jones' comments (linked here: http://spril.com/PermitReform/) as I firmly agree with them.

Thank you for your consideration and for soliciting member feedback on this proposal.

58.	3/29/2021	Greetings Thank you for your confirming you have received and forwarded this email to concerned parties
		I have read the statement concerning GHI permits at http://spril.com/PermitReform/ and concur with the points made by Tom and Johanna Jones.
		Please make sure to render the permit process less cumbersome, as well as more transparent and equitable.
		Like many GHI members, I have had a frustrating permit experience, for a fence and privacy screen many years ago.
		My last experience with Stuart Caplan for a picket fence replacement has been fine, but I would have felt cheated if I had to pay \$ 100 (proposed \$ 300 - \$ 200 rebate) for a notable improvement to my property and to the cooperative as a whole. As far as I know, the time which GHI spent on this fence replacement consisted in scheduling me for an appearance in front of the Board and one (maybe two) site visit(s). This would not have amounted to \$ 100 of GHI staff time. If so, I wish I could be paid as much!
		As an architectural and planning historian, I have lectured and written extensively on Greenbelt and I have been a member of the City of Greenbelt's Advisory Planning Board since 2012. I care very much about the place where I live and I am very concerned with the fact it is becoming less affordable to buy into, and live in, GHI.
		Please review the permit fee issue so that members are willing to cooperate with staff and willing to improve their home.
		Especially when county and city permits have to be added to a GHI authorization, the toll on time and money can be defeating.
		Thank you for your consideration
59.	3/30/2021	I would like to share a few thoughts regarding the GHI permit proposal created by the finance department.

		I understand the importance of ensuring that all work done by outside contractors needs to be up to code to avoid issues in the future. However I think the steep deposit will discourage homeowners from following the permit policy. 1) Reduce permit fees Can the permit cost be adjusted to be more affordable especially for projects that do not require a permit from the county? For example a shed permit could be \$50 with a \$25 refund at the end of the inspection. For projects that require a county permit but aren't additions, can the fee be reduced to \$100 up front with a \$50 refund. \$300 is quite significant on top of the other upfront costs like the county permit and deposit required by the contractor. 2) Mandatory Zoom meeting Additionally I imagine the time spent reviewing permit applications can be extensive. I went through the permit process in 2019 and experienced numerous emails with my contractor and GHI. My contractor wasn't familiar with GHI (local contractors were unavailable) and became frustrated with the multiple requests GHI had. Implementing a Zoom call with GHI, the contractor and the homeowners could help to eliminate miscommunications and going back and forth.
	2/22/222	Thank you for considering my recommendations
60.	3/30/2021	After reading what you have provided and discussing it with neighbors, I fail to see how charging a fee (even refundable) will streamline the permit process. A fee will not make the process go any faster or motivate people to comply. It is only adding an additional unnecessary burden on those that are already following required procedures. Members pay enough in their monthly co-op fees as-is and I do not support this additional fee requirement.
61.	3/30/2021	Annie Shaw, member 39-B Ridge Road cell 301-275-9870 i.am.annieshaw@gmail.com GHI Finance Committee c/o Managers Office

mgmtoffice@ghi.coop

1 Hamilton Place Greenbelt MD 20770

Dear Finance Committee, GHI staff, Board,

I write to disagree with this recommendation: The Finance Committee has recommended that GHI institute the following charges for processing permit requests:

- \$300 for any GHI permit except for a new addition.
- In the case of a new addition the greater of \$800 or 2% of the cost for a new addition.
- Upon completion of the project including closing out all GHI permits, \$200 of the fee shall be refundable.

With a refund of the \$200 fee upon completion of a project and closing out a permit, the actual fee would be \$100 for any permit except for a new addition and not less than \$600 for a new addition.

I strongly disagree with the proposed imposition of excessively high permit fees as these fees will impose additional hardships on members and staff without the accurate guidance that clear written website information could provide. I strongly support the proposals set forth by Tom and Johanna Jones, GHI members on Woodland Way to update the GHI website to provide accurate information to guide members, and staff, as members seek to upgrade our units/yards and request that this be THE priority rather than imposing excessive fees.

The Finance Committee fees are three to fifteen times higher than permits from the City of Greenbelt or Prince George's County. GHI also requires permits for far more projects than the City or County, including sheds, patios, dishwashers, stoves, refrigerators, washing machines, dryers, rain barrels, and privacy screens, so the impact on members would be a dramatic permanent hike in the cost of home improvements. You can't seriously expect members to submit \$300 upfront (even if part of the fee can be refunded later) for a permit to replace a light fixture or rain barrel—for which the entire project often costs less than \$100. These proposed fees tower above what neighbors pay throughout Greenbelt, and will add significant regressive cost to GHI members hoping to purchase newer more energy-efficient appliances.

		I concur with the reasoning of Permit Reform and have copied Tom & Johanna Jones' proposals:
62.	3/30/2021	Dear Mr. Ralph: I am writing with regard to the fee proposals for GHI work permits. I object to charging fees to members for work permits.
		As our housing gets older, it is inevitable that the houses will need more work done on them. If there has been such an increase that staff is unable to manage this work, which is an essential part of the cooperative, it may be time to reconsider staffing levels.
		Another reason that I object is because requiring members to get GHI permits for work that is governed by the county is redundant. It is not a good use of staff time, with staff time being a cooperative resource. The county already has a permitting process and an inspection process for electrical, plumbing and construction projects. It would be better to expect ALL work in the cooperative member, staff, and contracted work alike to be subjected to outside inspection and approval. This would also streamline the process of fining non-compliant member work because the county would do it.
		Perhaps the primary reason why I object is because there is no evidence offered as to why this proposal was made. There are arguments, yes, but there is no quantitative analysis that shows there is a need for this to happen.
		In the absence of that, I think back to the frequently expressed desire of a few board members to find additional revenue streams for the coop. Is this a bid to increase revenue by charging members for permits? Reviewing permits is a key component of the expectations for technical service staff, and I expect their time to be compensated through salary, which is already paid for by existing coop fees.
		I do not support a proposal to charge fees that would generate a substantial amount of income without an accompanying statement that outlines how much money this is projected to be, or what it would be used to pay for.
		This proposal is a step in the wrong direction.

63. 3/30/2021

Hi.

I'm writing in response to Proposal to Institute Charges for Processing GHI Permits. To summarize up front: I am not in favor of any new fees until the permit process is improved. In addition, if fees are applied, I believe the process needs to limit the scope of what permits specify, and have financial reimbursement of fees if timelines for permits aren't met. Finally, \$800 or 2% seems like far too much and GHI should publish what service is provided for this fee or the rationale for charging at that level. I would be happy to get involved to help improve the process.

My Background. I'm a new resident having moved in during March of 2020. We loved our house, but wanted to add a fence (for our daughter and dog) and a shed. Later we decided to do a kitchen remodel and also add a patio.

Time: The permit process does not currently run in a satisfactory time or give any clarity into the timeline. All my permits took well beyond the documented expected timelines and updates both verbal and in email didn't give a clear explanation of either the process or the timeline. I would want this fixed before I pay to have this service.

- The fence permit took 3 months
- The shed permit took 3 months
- The kitchen permit took 2 months
- The patio permit took 5 months

Permit process is too rigid: The process today is far too prescriptive. In my shed permit it tried to specify my shed placement exactly, and an attempt to move it slightly farther from trees to make it easier to maintain and build was a point of resistance. By necessity, my patio permit also spells out exact size and placement instructions and an attempt to change them (to ease construction so that I don't have to cut cement pavers) requires approval and is not prompt.

Don't make the bad reputation worse: I think this permit process is notorious. When I talk to neighbors, they say "just do your project and don't ask". When I talk to former residents, they say "yeah...it's terrible isn't it?" I think the things above contribute to those perceptions. I also think that the process goes beyond what really needs to be looked at. I was told things during the process like "you'll like it better here" and "it will be better because you can see xyz." It is nice to have the advice of experienced people if I ask and if it doesn't slow me down, but not as a barrier to getting my project done. I think adding one more thing

(cost) on top of all that will really hurt people's compliance with the process and GHI will have many more projects go unpermitted.

Rationale for Charging is wrong: The rationale for adding fees is wrong. "The Finance Committee considered that staff spends a considerable amount of time reviewing permits that only benefit the members who submit those permit requests." While true, the permit process is the balance struck for GHI to protect the interests of GHI, not the member. GHI is attempting to impose aesthetic and quality standards on the community. None of that is for the member, it is for the community. This doesn't mean we shouldn't charge a fee, but I still think the permit process should figure out why it exists and try and focus on that.

Cost: \$100 seems reasonable for a permit. If each inspection needs to come with a refundable \$100 down payment that's fine too, but then it places an obligation on the Permit Process to be available at the time needed so that the member's costs are limited if contractors are hired to do work and time isn't lost. 2% of the cost of an addition just sounds like a tax or an alternative funding stream, and it's not clear why that fee is so high. This is one type of permit that will actually result in more money for GHI because a member's monthly payment will increase. The rationale for this should be re-examined and explained to make it clear why the permit cost is proportional to the cost of the work. A flat rate that covers administrative costs would be more reasonable.

Again, If you need help from members to help examine the process and propose changes I would happily volunteer.

Thanks very much, Michael Campbell

64. 3/30/2021

I am writing with my feedback regarding the proposal to institute charges for processing GHI permits. This proposal is not well-conceived and will not improve the permit process; it is, in fact, likely to make worse the very problem it purports to solve. Instituting fees, especially as substantial as what is being contemplated, will make members *less* likely to comply with the permit process, not more likely. This is especially true for modifications that would not require a county permit, or could conceivably be completed by a handy member without hiring a professional, such as installing a patio. Streamlining the

		permit application and process, making it easier to understand and comply with, speeding up the process - these are things that would tend to increase compliance with permitting and inspections. Making it more expensive, without even an effort to make it simpler or less cumbersome, would decrease compliance. This is self-evident. In addition, the Finance Committee's statement that the permit process only benefits the member requesting the permit is exactly backwards. The raison d'etre of the permit process ought to be that reviewing improvement requests and ensuring their compliance with rules and standards benefits the entire membership of the cooperative. Thank you for your time and consideration,
65.	3/30/2021	GHI Board of Directors,
		I am writing to you to express my reservations about the new fees proposed by the Finance Committee for permit requests. I am relatively new to the coop but I have been discouraged by the permit process and agree there needs to be changes to make the process work but I can't support the committee's proposal as it is. I was considering doing some yard improvements during the last year, some of which I knew would require permits to complete and some things that were not clear to me based on the green book and GHI website. The thing that took me by surprise the most was the requirement to apply for a permit to install raised garden beds which was communicated to me by the Technical Services Staff. If permits are required for small projects like this, the permitting process should be as simple as possible to encourage people to improve their units.
		Many of my thoughts on this topic have been expressed more eloquently by other members including the counterproposal offered by Tom Jones. I also am not completely against a permit fee structure but the whole permitting process needs to be revisited, improved, better documented and explained while any fees need to be reasonable for the proposed project.
66.	3/30/2021	Hello,
		I have a few thoughts on the proposal to charge fees for GHI members requesting permits from Technical Services.

- First, I get that our Technical Services staff devote a lot of their time to handling member permit requests and improvements, and that that time is used for the benefit of those members making improvements, which may or may not have value to other members in our cooperative. I can appreciate the desire to have members who are making optional improvements to their units help cover the cost of staff time. In the case of additions, I don't think that this would be inappropriate if the total amounted to only a few hundred dollars (maybe maxing out at \$500) depending on the complexity of the job. Charging for minor improvements like replacing existing fences or skylights or installing a new rain barrel or shed are unlikely to demand much staff time at all, so charging fees for these improvements seems like we would be punishing members for making improvements to their units--which we should all oppose.
- Second, the notion that members should have to pay in order to get attention from staff is questionable. If we charge members for taking up Technical Services staff time, do we charge members who have a complaint or conflict with another neighbor and who take up Member Services time? What about if a member has a lot of questions about how our cooperative functions, and regularly calls the front desk to ask questions--should we charge by the minute? If a member has a significant number of maintenance issues in a year (even if they are covered components), do we charge fees for taking up the time of Maintenance staff? Not every member has a bicycle (I don't) but all members contribute to funding for the Bicycle Committee. Not every member has a pet (I don't) but all members contribute to funding the Companion Animals Committee. I think it is reasonable for members to accept that not every last cent of their coop fees will be spent just for their benefit (we're a COOPERATIVE after all!).
- 3. Third, the permitting process with Technical Services could use some significant change to help serve both members and staff for the long haul. To begin with, it often takes weeks to hear back from Technical Services on permit requests for the simplest projects. Last year Maintenance told us we had to replace our skylights and said they may have been the cause of the leak in our roof, but to do so would require a Type II Permit from Technical Services. We explained to Technical Services that this was an emergency matter and that a prolonged process had the potential of doing further damage to our unit, but it took multiple

weeks, and follow-up from us before Technical Services ever responded to our initial request. Then our request was rejected because the language on the website (and the Green Book) said "flush mount" skylights were not allowed, but it turns out no one in the industry calls them "flush mounts" anymore, the correct term is "deck mounts." We requested to replace our deck mounted skylights with new deck mounted skylights only to be told, "no, flush mounts are not allowed." Our process was delayed several days on an emergency matter because the rules were written decades ago with old language that is no longer in use.

My point is that if Technical Services is going to charge us money (even a small fee) for requesting permits for even small items, then they must be held to strict account to reply in a much more timely fashion. Every submission should receive an acknowledgement by the next business day. Every simple permit request should be approved or rejected with clear details within five business days. It's fine for bigger projects to take longer, but there need to be clear guidelines. Any permit request not accepted or rejected within the approved timeline should result in a complete refund of fees for smaller items, or a 50% refund of fees for additions. If we have to pay extra on top of our monthly coop fees, then we are entitled to swift and excellent service or we're just getting ripped off. If we are understaffed, let's hire someone new to help out.

Four, the website must be updated and a thousand times more helpful than it currently is. The website regularly has unclear or missing information. We recently made a request for a shed permit, and the permit request form requires different information then it says on the website or the Green Book. The form says we can reference a GHI standard shed design drawing in order to make one for our request, but the website has no information about such design drawing. If GHI has it, then it needs to be on the website and easy to locate. How many times per year do our Technical Services staff have to print or email one of those shed design drawings for members to reference? How much time is spent doing that (or rejecting applications that don't have that included) when it could be put on the website and save a lot of time for both staff and members? These opaque instructions only frustrate members, delay the permitting process, and require extra staff time to rectify.

I led the work on the 2019 GHI Membership Survey, and in the Communication section we saw that the website was by far the most frequently referenced medium for these type of issues (on-going information, as opposed to consulting the Green Book, social media, or contacting GHI staff). Other popular communications medium like the weekly E-News and the *Greenbelt News Review* share announcements and schedules, not everyday GHI functions and policies. The website is widely used, but if the information online is incomplete, unclear, or out-of-date, then we are actively making life in GHI harder for our members and our staff. Let's help out our Technical Services staff and our members by making our website work for all of us.

We should have staff or a task force do an audit. Let's imagine that whoever is doing it is completely unaware of what improvements in GHI require permits or how to get them. Let them go to the webpage and see what they can discover. Is something missing? Is something unclear? Will they see that the Type II Permit Request Form doesn't even mention where you can email the form? Will they see that the "Contact" staff option allows you to send a message, but doesn't allow you to send an attachment? Let them see that if they don't know otherwise (and how can we expect them to?), the current set-up would require them to mail (which has delays and costs money) or deliver the form in person to the GHI offices during a pandemic. If the website doesn't make it clear, then it isn't clear. If Technical Services staff have details or requirements that members have to meet that aren't posted on the website, then they are guaranteeing frustration and wasted time for everyone involved.

5. Fifth, I wish there had been better communication about the need that this proposal is trying to address. It seems that one issue may be that members will apply for and receive a permit, but never follow up with GHI for a final inspection (which leaves open the possibility that their project does not, in fact, conform with GHI rules and requirements). That is a problem, and a fully-refundable \$50 fee for smaller projects might address that, but let's not ask members to put up lots of money in advance of making home improvements.

A bigger issue (or at least a large one) is how often members go ahead and make these improvements without GHI ever knowing. We need a major communication and member education campaign and a redesign of our communication with new GHI members (not prospective members, but actual members) to ensure that everyone gets how this works (and an improved website can be there to remind them/correct them if they forget). If members

are intentionally avoiding GHI's scrutiny and involvement, that is a problem, but requiring fees seems like a sure-fire way to encourage more members to make improvements without GHI approval. If we want more members to fully participate in the process, let's make it more clear and more easy for them to do so. If following the rules makes things slower, more restricted, more time-consuming, more confusing, AND more expensive, then why would we think this would incentivize members to go through the system instead of avoiding GHI? They shouldn't avoid doing things the right way, I agree, but we also have to know enough about human nature to know that this just isn't going to solve the problem of making improvements without permission.

In summary, there are a lot of changes that would be good for GHI to make regarding the permitting process, but charging fees must not be where we start. There may be a place for smaller, often fully refundable fees in the future, but if we want to save staff time, we can start with better communication and better information on the website.

If there is some other major problem that needs to be addressed, let's communicate exactly what that problem is to members, and THEN talk about proposals for addressing it. Get us on board with the need for changes before proposing changes that make it harder and more costly for members to make IMPROVEMENTS to their homes, and thus, to our mutually owned community.

Thank you for your time,

67. 3/31/2021

We're co-op members at 56-H Ridge and we just wanted to express our opposition to the Finance Committee's new permit fee proposal. We feel that this proposal will not effectively address the current issues with GHI's permit process; this open letter is a perfect summation of our views:

http://spril.com/PermitReform/?fbclid=IwAR2AnSvE4FAQq LRt2RblomMrUvAPsjMrbib8dn1hLa8XU0XqkqvfnYAeePw

We are particularly in support of points #1, #3, and #5. We feel that keeping the GHI website updated so that all members have access to the same (accurate) information about permits, standardizing internal procedures so that new staff are not left to reinvent the wheel, and reviewing/eliminating existing low-urgency permit procedures would make the permit process and GHI staff's

lives drastically easier, freeing up time and energy to spend on permitting that really needs to be completed, such as for plumbing/electrical work and additions. Honestly, we're a bit astounded these things aren't already standard practice. The current system seems burdensome for everyone involved, and given the wide range of income situations in GHI, we don't feel that making the permit process more expensive is a fair way of resolving that issue.

We hope the board will reconsider this new fee proposal and instead institute reforms that will actually improve the bottlenecks that have been discovered in GHI processes.

68. 3/31/2021

To Whom It May Concern:

First and foremost, I'd like to acknowledge and appreciate the hard work of the GHI employees- from management, to maintenance, to those who deal with the permits, and anyone else in between. GHI is a unique community where I've grown up, and I've had many positive experiences with the staff in all the 20+ years I've lived here. I also appreciate all of the committees and board members who put forth a lot of time and effort to help make GHI great.

I would like to be added to the tally of other members who agree with and appreciate the letter provided by members Tom and Johanna Jones.

Although I grew up in GHI, I am a new-ish GHI member, having moved into my own home in July 2020. I moved into a home that needs considerable updating- lots of little projects here and there over time. I am a full-time worker, parent of two kids, and while the monthly co-op fee is not cheap, it gives me a sense of security knowing that the main components of my home will be maintained. GHI is not luxury living. I am on a budget, and I'm sure many other GHI members would agree they are in the same situation. If my home were in immaculate condition when I moved in, I would have no need or interest in obtaining a permit. However, I would like to make my home better and I think making my home better will benefit other current and future GHI members.

Member Problem: When a member wants to submit an application, the information GHI needs is unclear. It's not even clear what specifically needs a permit. I was told by other members a permit wasn't needed for what I was going to do(and I didn't see much about it on the website),

but a GHI employee told me otherwise (after I had already planned my project and started ordering things needed). Information is conflicted, and there is no concrete information. After finding out I needed to submit a permit application, I submitted a permit that was so extensive and took me hours to put together, because I had no idea what was needed. I just added everything. It was probably unnecessarily long.

Possible solutions:

- 1) More organization.
- 2) Give members a detailed list of what they should submit for their specific project. If they want to replace a light, give them a list of the exact items GHI will need.
- 3) What is the process and when should we expect to have answers?
- 4) Some sort of annually updated resource with helpful information at our fingertips. The website isn't helpful or clear. We shouldn't have to call someone or email someone to figure out what is needed.
- 5) What are the requirements for certain items and who is responsible for each step(member or GHI)? For example, if I am doing a full kitchen/bathroom redo, there should be a layout for that. Am I responsible for updating the electrical, plumbing, subfloor? Can I choose my own cabinets? Do I really need a permit for a new dishwasher? Just to name a few.
- 6) Can we computerize/digitize the process- there must be a program where we can submit the application online and receive updates or check status online. Maybe other cooperatives or associations have done something similar.

GHI Problem: Members submit applications but never follow through. This wastes the time of GHI staff. Possible solution: Make permit applications easier all around for everyone. Like GHI employees, GHI members are spending much more time than they should have to working on and following up on permit applications, or asking/answering questions that should be easily found online.

While I do not believe in charging GHI members a fee for permits, I do understand the frustration that may be caused by members submitting permits and never completing the work. The Finance Committee recently suggested \$300 application fees, with \$200 returned after the project is complete- or something similar.

The problem: \$300 is a lot to any average joe on a fixed income, even when you know you will get part of it back.

GHI is not a luxury community, and most members are on a budget. A \$300 fee may either 1. Deter members from doing any home improvements that may need to be done or 2. Members will forego requesting a permit and do the work anyway. Neither of these are in the best interest of the cooperative. GHI has a reputation for being hard to deal with when it comes to permits- if we changed this, more people would submit permits. I feel lucky my current neighbors are responsible and wouldn't do anything dangerous to their home(i.e. their own complex electrical work), but what if they move out and a rule breaker moves next door? I now fear that less people will apply for permits and do work the right way. We cannot neglect the fact that making permits harder to acquire will possibly cause more danger. GHI employees will have less permits to sift through because less people would be submitting them.

I also propose board meetings (or some sort of subcommittee meeting) to meet more than once per month, so members can get the ball rolling on projects.

Again, I agree with Tom and Johanna's statement and their idea for permit reform. We want to make this a better GHI for everyone. The current permit process is currently so stressful (I am feeling that stress now)that it will likely deter new members and drive away current ones. It's also unfair to GHI staff who deal with permits daily. Let's make it better for everyone!

I currently serve as committee chair with the Greenbelt Cub Scouts, however, in the future, I look forward to joining various committees within GHI to help members and employees find solutions to issues such as this.

Please reach out if you have any questions

3/31/2021

To the General Manager, Board of Directors, and Finance Committee,

I am writing to express my strong opposition to the new proposed changes to the charges for processing of GHI permits. Despite what the reasons that the Finance Committee gives to justify these new charges, I can see no reason why this is necessary or appropriate. I vehemently disagree with these new proposed changes and the reasoning for implementing them.

(1) This will only encourage members to complete projects without permits. Despite members being able to receive

69.

\$200 of the \$300 charge back, \$100 is an excessive amount to pay for a permit. This includes projects where the overall cost may even be less than \$100. The charges are punitive and will only produce the opposite of the desired effect - more members will complete projects without permits.

- (2) Members will lose money if the county/city does not close a permit. Many years ago, I submitted a permit for a privacy fence. As per the GHI policy, I submitted a permit to both the county and the city. Later, I was told by GHI that my permit was never closed for this since I did not have the county complete their final inspection. However, the county refused to come for a final inspection. This is because the county viewed it as such a minor project that it was not worth their time and manpower to inspect it. In a case like this, my \$200 refund from GHI would be held hostage for something that was out of my control.
- (3) If the process were easier, it would take less staff time. Reviewing and approving permits is part of the responsibility of GHI staff members. Staff would not have to take nearly as much time if they didn't have to waste time helping members determine what required a permit and going back and forth about requiring members to get permits from the county and city as well.
- (4) Will members be refunded for unnecessary permit requests? If Staff and the Board have not already been made aware, there are stories of members constantly being told they need to submit permits when, in actuality, they do not. If a member submits a permit for a raised garden bed or appliance replacement with a \$300 check, will they be refunded the full amount since the permit is unnecessary? Or will GHI keep the \$100 for "the time that it took to process the (unnecessary) permit?"
- (5) County and city permit fees are not meant to be a means of income. These permits are required to ensure that projects are completed up to code and in a safe manner. Why must GHI be redundant in doing this? Are the GHI staff that are approving these permits engineers who are qualified to determine the safety of such a project? Knowing that this is not the case, this permit process through GHI is mostly a process to determine if GHI wants to allow a member to improve their home. This appears to be an unquestionable way that GHI is attempting to produce an income.

(6) Members should not be discouraged to improve their homes. As we all know based on the market, updated GHI homes sell faster and for higher costs than those that are not updated. This whole process discourages members from updating their homes - for purely aesthetic reasons or for a necessary reason (such as a ramp). This is also unfair to members who may not have the funds to pay \$300 for a project that is already costly to them based on their income. In many instances, fees have already been paid to (the experts) in the county and the city who have determined that the project meets the county and city codes. What additional expertise can GHI staff have to offer that merits a charge (whether \$300 or \$100 with the "refund")?

Over the years, GHI has found more and more ways to become punitive, controlling, and to drive away current and prospective members. This is just one more way in the list of many that GHI is continuing to do this. Requiring members to pay an absurd fee will not encourage members to submit permits correctly. In fact, this will make more and more projects that actually require permits to be completed without one. The website is already horribly unclear as to what requires a permit and what does not; staff members cannot consistently answer questions about what requires a permit - now members are expected to pay \$300 out-of-pocket based on inconsistent and confusing information?

I strongly oppose this new fee change, and I sincerely hope that the staff, Board, and Finance Committee see the horrible mistake that it would be to approve these new fees. If GHI's mission is to be affordable and customerfocused (note: we are *members* not *customers*), then this fee change would be exactly the opposite.

70. 3/31/2021

For members of modest means, a non-refundable fee of 2% of the cost of the addition seems too great for new addition permit/inspections. When PG County and city permit fees are added the total would be considerable.

If the issue is that some members do not contact staff for required inspections, and there are costs associated down the road for fixing problems, please consider a deposit that can be returned after all GHI required inspections are completed. Then those who follow the rules will not be penalized equally with those who do not follow the rules.

Please only consider an inspection fee that will cover GHI's costs. If a 2% fee will produce income above cost it does not seem appropriate.

Please give members data regarding the expense of staff time for issuing permits and completing inspections so we can understand why you recommend taking away a service that has always been covered by the co-op fee. Based on the history of past permit requests, please also let members know what you expect the income from new fees would be. It does not seem reasonable to ask us for feedback without providing sufficient information.

I very much appreciate the service GHI offers in permits and inspections. If the cost of staffing to provide this service in a timely way is also an issue, then please let us know.

71. 3/31/2021

Dear Finance Committee,

Thank you for considering member comments before making a decision about new permit fees. I object to the permits fees as it is currently laid out in the 'Proposal to Institute Charges for Processing GHI permits'. While it has been a guite a while since I have done any work that required permits, I will likely need to get at least one permit in the near future and having to pay an extra \$100 (after refund) is outrageous especially, if I also need to pay the county and city fees for their permits. In reality the GHI permit does not seem necessary if the other permits are also required. Additionally, I feel that the GHI permitting a service already paid for as part of our coop fees and any additional fees would add financial burden to many members. The proposed permit fee seems more like calculated move to make money for the coop and would likely increase members' frustrations by billing us hundreds of extra dollars rather than providing support to update and improve our homes.

Maybe what is truly needed is an overhaul of the GHI permitting process. The GHI permit system could be improved through an easier application process and eliminating the need to apply for some actions. GHI could move towards an electronic permit application process, update and revise the website permit and inspection information (clearly define the role of GHI member – there seems to be little on inspections on the current website), and provide clear explanations for permit time lines (e.g.,

why a type I permit takes 30 days vs a type II that takes 20 days). There should also be different time lines for new projects (i.e., a new addition, porch, etc.) vs. replacing or upgrading what is already there. GHI could also eliminate the need for permits to install replacement appliances or other actions by providing for an optional review of electrical capacity and/or adopt local permits for some actions with only a review by GHI. Many members have expressed frustration with the GHI permitting process that caused extreme delays in implementing the work (granted some of the delays over the past year may have been related to the pandemic) and the GHI inspections contradicted requirements of the Prince George's County inspection.

I would expect that the high fees would not accomplish the stated goal of encouraging members to complete the permit process. More likely than not, the large fees would produce the opposite effect by incentivizing more members to ignore and subvert permit rules beyond the handful of members that currently do this. GHI could implement a similar process as the yard inspections where a member, who does not address a violation after reasonable notification, is charge fee-for-service rates for the remediation action.

While I support GHI inspections and some level of approval from GHI for substantial construction, such as additions, inwall electrical work, and plumbing work, GHI members should not be charged exorbitant fees when we seek to improve our homes and community. If a fee is warranted, then a more modest permit fee may be acceptable. The large fees being considered would only exacerbate the issue of noncompliance and potentially delay members from making improvements. Thank you for your service, and request you consider other options for addressing GHI permits.

72. 3/31/2021

This community was built as low-income housing during the Great Depression; it was not meant to last as long as it has. Permit processing fees penalize any homeowner who wants to make their home competitive to modern living standards, which is what needs to happen if this neighborhood is going to attract new residents and survive. This is a naturally occurring retirement community. Permit processing fees penalize aging homeowners on fixed incomes who need to make improvements in order to age-in-place.

		If staff are encountering construction defects after improvements are made, penalize those individual homeowners and make resale inspections more thorough. If staff members are spending too much time reviewing permits, maybe too many items require official permits. Perhaps permits should only be required for structural changes. It's hard not to see this as a money grab. We're in the middle of a pandemic, which has people stuck at home. Of course more people are requesting permits. They have a
		clearer idea of the problems in their homes and they have the time and energy to address them. The money that they put into their homes comes back to the larger community when property values increase. A permit fee double dips.
		Co-op fees are already high enough. When I look at neighboring communities that have lower co-op fees but provide more value - utilities included, modern structures, racial diversity - it gets harder to recommend Greenbelt to others.
73.	4/01/2021	I have been a GHI member since 2008. Throughout that time, I have gone through the permitting process to make improvements on my home. I do not think fees for GHI permits should be in place for members. I believe that when a member is making capital improvements on GHI property, they should be helped through the process by GHI staff rather than hindered by an out-dated, cumbersome and (potentially) expensive permitting process.
		The member fees should cover the cost of permits.
		If the finance committee DOES decide to implement fees for permits, then the process needs to be streamlined. The forms should be online with turn-around times of hours rather than weeks. The staff doing the permits and inspections should be knowledgable about the codes and regulations of the county and the coop. And permits should be closed in a timely manner. I currently have two open permits on work finished a year ago.
74.	4/01/2021	Prior to imposing these fees, I feel that GHI needs to examine its permit requirements and eliminate those that are petty or unnecessary.

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		For example, if Tom Jones's post is correct that GHI requires permits for refrigerator installation or if they are required for installation of a laundry unit not requiring changes to electrical outlets or plumbing, for example, these requirements should be removed. It would be absurd to require me to pay \$100 just for GHI to confirm that I plugged my refrigerator in correctly.
		In addition, few members would even consider such a purchase as involving an improvement to their home.
		In addition, GHI should provide written confirmation that it has granted approval to an improvement. If \$200 is going to be based on my not having met the inspection requirements, how can I prove I complied if GHI just walks thru and says ok without giving me any documentation. (Nothing fancy just something in writing, whether physical or email.)
		It's off topic, but GHI should also review its policies for where unnecessary exceptions are needed. I don't know why it was changed but the requirement for the board to grant an exception for a service side fence is absurd. Although a service side fence may, occasionally, require removal for pipe maintenance, with so many homes already having such fences it is unfair to impose this burden on new or replacement service side fences.
75.	4/01/2021	I just wanted to write this to let you know I am highly opposed to the newly proposed permit fees. These fees are ridiculous and can severely hurt already struggling families. Can you imagine hardly having enough money for groceries, then you fridge breaks and you extremely stressed on how you are going to replace the pricey appliance, only to have to try to come up with the permit fees also?! I know numerous families, mine included, that would have to literally forgo having a fridgerator at all due to the cost that would come with replacing it. We shouldn't be increase the strain and stress that already occurs when an appliance we count on breaks. These new proposed fees are an awful idea that will cause a lot of unnecessary stress to our families throughout Greenbelt.
76.	4/01/2021	I think that the permit fees are too excessive and will do nothing to fix the situation that you are trying to fix by suggesting them.

77. 4/1/2021 I have read the statement concerning GHI permits at http://spril.com/PermitReform/ and concur with the points made by Tom and Johanna Jones. Please make sure to render the permit process less cumbersome, as well as more transparent and equitable. Like many GHI members, I have had a frustrating permit experience, for a fence and privacy screen many years ago. My last experience with Stuart Caplan for a picket fence replacement has been fine, but I would have felt cheated if I had to pay \$ 100 (proposed \$ 300 - \$ 200 rebate) for a notable improvement to my property and to the cooperative as a whole. As far as I know, the time which GHI spent on this fence replacement consisted in scheduling me for an appearance in front of the Board and one (maybe two) site visit(s). This would not have amounted to \$ 100 of GHI staff time. If so, I wish I could be paid as much! As an architectural and planning historian, I have lectured and written extensively on Greenbelt and I have been a member of the City of Greenbelt's Advisory Planning Board since 2012. I care very much about the place where I live and I am very concerned with the fact it is becoming less affordable to buy into, and live in, GHI. Please review the permit fee issue so that members are willing to cooperate with staff and willing to improve their home. Especially when county and city permits have to be added to a GHI authorization, the toll on time and money can be defeating.			Please do not charge such excessive fees. Even with the \$200 you get back at the end it's ridiculously expensive. Plus the total amount (\$300) is so high that many people could not afford to give up that much money, even if they get some back later. So many people would not be able to make improvements to their units. Come up with a more streamlined and less expensive fix for the permits
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78. 04/1/2021 Dear Finance Committee,			to a GHI authorization, the toll on time and money can be
	78.	04/1/2021	Dear Finance Committee,

GHI Vision Statement We will provide affordable, well maintained homes in an attractive cooperative community. We will create a customer-focused culture in which members and employees are treated with the same level of respect, courtesy and attention that we would personally expect.

Thank you for considering member comments before making a decision about new permit fees. My feedback is below. Overall GHI has been a good place to live. Service response is timely. Staff are nice people.

I object very strongly to any attempt by the Board and Finance Committee to impose expensive new permit fees in an attempt to address their long-term failure to properly manage the GHI permit system. The 1,600 members of GHI own our cooperative. We deserve consistent organized GHI customer service as we improve our homes and community. Using punitive fees as we try to follow the rules does not foster compliance or great good will.

- Posting of this proposal in "The March 8, 2021 GHI E-News" is not sufficient notification. GHI members need to receive notification by mail or by delivery to each unit. The Board has discussed the fees on January 7, 2021 and March 4, 2021. "Official minutes are posted approximately 4 weeks after the meeting date, due to the approval process of the Board." The information posted March 8, 2021 on these discussions is too general to be of much use.
- The only Finance Committee meeting from March 8th to April 2, 2021 was on March 11th. The two Board meetings from March 8th to April 2, 2021 was on March 18th and the next is **April 1st**.
- The Coronavirus (COVID-19) pandemic is in the second year. Some members financial situations are precarious. Propose such high fees at this time is irresponsible and misguided.
- 4. I pay a monthly Frame fee of \$288.35 for upkeep on my unit. Will I now pay \$300. \$200 = \$100 to have a faucet or outlet replaced?
- 5. During remodeling there were a least four permits. The new proposed upfront fee cost would be at least \$1200.00. Can each new owner afford \$1200.00? How can processing four refunds improve efficiency and save staff time?
- 6. I am considering a new porch on the garden side with a fee cost of the larger of \$800.00 or 2% extra. 2% of \$5000.00 is only \$100.00. I have to pay

upfront \$800.00 which is 2% of \$40,000. \$600.00 is 2% of \$30,000. This is totally unreasonable. GHI's IT structure needs updating and/or replacement plus training. This would greatly improve the current undependable communication between departments and between staff. 1. The GHI handbook was last revised October 2018. 2. The current GHI maintenance request and permit system is in a state of disarray. 3. The communication between departments and between staff is undependable 4. The 2020 repairs on my new gutters took three requests and three visits. Due to three work requests the visit repairs uncoordinated, and no paperwork was left. 5. The 2014 remodeling permits were obtained and inspections were timely but incomplete. GHI failed to replace the 14T Ridge Rd drain pipes when the walls were open. 79. 4/1/2021 These are comments on the proposed new fees for permits from GHI that we would like to be considered and incorporated into the record when the board considers this matter. Dave & Joyce Campbell 7D Plateau Place 1. We support the comments and permit reform proposal of Tom and Johanna Jones, except for their idea to track and publish annual key metrics. We fear this would just add more time-consuming work -- unless the tracking can be done automatically within the new system that should be set up. 2. If the problem to be solved is that some members go ahead and do something without going through the permit process, then that problem should not be "solved" by adding permit fees, even if refundable. As the Jones say, let's use carrots and not sticks. The monthly fees to live in GHI are so high already -- we should be looking for ways to reduce costs not add to them. 3. If the rules are made to be consistent, clear, and widely disseminated, then fees should be assessed only on those who do not follow them and, of course, they should also pay for the changes required to adhere to the rules.

3. If you're going to charge a fee for additions as a percentage of the cost of the addition, 2% is too much and would add too much to the cost of the addition. Better 1% or a flat fee comparable to the County's fee. Let's not forget that those with additions pay a hefty Addition Maintenance Fee monthly forever going forward which I think covers the additional cost to GHI of having an addition.

Bottom line, I think we need comprehensive permit reform and we oppose the Finance Committee's proposal for new fees.

80. 4/1/2021

The following are my comments on the Finance Committee's recommendations for additional charges for the processing of permit requests:

If the Board is planning to require these additional charges, the membership has a right to know the reason based on data. Do 90 percent of members requesting permits not comply with GHI inspection requirements? Is it 50 percent? Without showing that there is a problem, to me as a member, these additional charges just sound like a moneymaking scheme and quite unfair, particularly for members of modest means. For example, stating that 'many members do not contact staff for the specified inspections;' is imprecise; what does this statement mean quantitatively? Did the Finance Committee or any other committee look at data--of the XXX permit requests over a given period of time, how often was this a problem? How often did staff encounter construction defects as a result of members not complying with the GHI inspection process? Once for every 10 permit request? Or 9 out of 10 requests? It is unclear why the Board and Finance Committee are proposing additional charges for all members who may be going to great expense to build an addition in order to remain in the Co-op when they also have to pay county and city permits as well. Why is this proposal not pointed only toward those members who are not complying with GHI inspection requirements?

But then another reason for the additional charges is raised. If the Finance Committee believes that staff spend a considerable amount of time reviewing permits that only benefit the members who submit those permit requests, then the committee should be able to tell the membership how much time was spent for a given period of time reviewing such permits. For example, the Finance

Committee could analyze data on how long each permit request for the past 5 years took to review to determine the cost of conducting such reviews. Frankly, I thought reviewing permit requests was part of staff's regular duties and covered by the Co-op fee, not to mention the increase in the Co-op fee if one builds an addition. Without providing data, however, it is unclear what basis the Finance Committee used to come up with the charges.

Seems like it would be more fair to fine members who do not follow GHI's inspection process; that is, to post a table of penalties by the portion of the process for those members who do not follow the process than to penalize anyone who wants to improve their home. Or refund upfront charges to members who follow the process and keep those charges for members who don't follow the process.

Be aware, there also could be unintended consequences of additional charges; I can see that for smaller improvements, members will have work done without submitting a permit request, which could result in greater problems for GHI.

Moreover, as I have neighbors who either do not have Internet access or do not understand where or how to comment, it seems like the Board will not get a real flavor of how the membership feels about such additional charges without reaching out in a way other than solely electronically.

81. 4/1/2021

We believe that the proposal to charge fees for permits for additions and other home improvements is fundamentally flawed and should be rejected. While we will present a number of arguments, our overall point is that the measure proposes a revolutionary change with far-reaching, deleterious consequences, all without significantly offsetting average member monthly fees.

Part of the problem is that the proposal is unnecessarily obscure. Consider the following:

1. The proposal oversimplifies a complex problem. Written in a terse and confusing manner, it joins together two quite distinct problems: permit compliance and permit costs. This opacity makes it harder to consider whether compliance with the permitting process could be ensured by other means at no net cost to applicants—for example, by a fully refundable deposit.

- 2. The proposal provides no means of assessing whether the benefit it claims is a substantial or a trivial one. To verify this would require providing estimates of the additional revenue anticipated. Without such an assessment, it is impossible to judge whether the solution to offset permit costs through fees would be outweighed by the problems it likely would cause, as discussed below.
- **3.** The proposal frames the issue with a questionable assumption. At the heart of its argument is an unsupported assertion that "permits... only benefit the members who submit those permit requests" [emphasis added]. We will address this below when considering how home improvements benefit the whole community ("public goods").
- **4.** The proposal's narrow focus on the permitting process obscures the bigger picture. Because the proposal focuses on home improvement *permits*, it ignores the larger and more significant part of this issue, which is the actual, concrete home *improvements*—not the permits, which are a means to that end—which result in a good for the whole cooperative. Focusing on the permits is a case of the tail wagging the dog. This point will also be discussed below in the section on public goods.

Even if the proposal were rewritten to make it more understandable, it would still fail to address the likely consequences of instituting the envisioned fees. Those include the following:

- 1. The actual financial benefit to the average member of the proposed fee schedule appears to be quite trivial. It's hard to envision a realistic revenue projection that would have a significant impact on monthly fees. If you estimate annual revenues from the proposed fees to be as high as \$50,000, it would offset average per unit monthly co-op fees by only \$2.60—about the cost of a McDonald's Happy Meal. The proposal uses a cannon to go after a gnat. The cannon is the unprecedented and high fees for home improvement permits. The gnat is the insignificant cost the current no-fee system imposes on the average member.
- **2.** The public goods resulting from the long-standing practice of no-fee permits are quite substantial. Public goods are often difficult to quantify, but impossible to ignore. The proposal completely ignores this aspect. This

complex subject deserves much lengthier treatment than we can go into here. But consider the following public good:

Additions and other home improvements make enduring contributions to GHI's housing stock. These durable improvements enhance the entire community. They make our homes more livable and keep people in the community who might otherwise move if their needs might be better met elsewhere. They give potential buyers a much more attractive range of choices than would otherwise be the case. Additions, in particular, allow for a greater diversity of members and family structures. Units with built additions are highly sought after. Permit fees will discourage future building.

Thus the policy change will affect the community as a whole. Families with children, in particular, will be under pressure, whether they are current members or prospective ones.

3. The impact of new fees on members applying for permits would be crushing. This is most obviously the case with respect to additions, for which the proposal envisions much higher fees. Such fees would impose a huge financial burden on members precisely when they are most financially challenged by the large cost and risk of building.

The smaller fees for other home improvements are, in the long run, also burdensome. As everyone knows, these are old homes. To keep them livable according to current standards and tastes requires improvements. The list of possible internal improvements is too numerous to go into. Though the fee for non-addition improvements is relatively low compared to that of additions, its overall impact on members must be assessed by the number of improvements a member might make over time. Each time the member makes another improvement (e.g., replacing a toilet, installing new kitchen cabinets), they will be assessed an additional fee. Death, so to speak, can be inflicted by a thousand small cuts as effectively as one large one.

Furthermore, once fees are an established practice, members and potential purchasers will justifiably wonder whether they will increase. This uncertainty will add to the pressures members and potential buyers must deal with as they plan for the future.

- **4. The proposal is divisive.** This is another public good threatened by the proposal. It pits member against member. As mentioned above, it views a permit essentially as a service provided to an individual member, the implication being that not charging for such a "service" constitutes an injustice done to other members. In the absence of public clamor against the injustice it alleges, it risks inciting one. This division would replace the consensus—and the community and climate of opinion—that has emerged from over a half-century of practice.
- **5.** The proposal is also divisive by pitting members against staff. The proposal justifies fees by the amount of time staff spends processing permit applications. It would be natural for members therefore to ask: Is that amount of time necessary? Is the process efficient? Those are worthy questions to address at any time. But the proposal's high fee structure creates a toxic atmosphere that would ill-serve a careful review of the fee process and the thorny issues such a review might raise.

For all the above reasons, this proposal should be rejected.

One urgent question remains: If the Board is not willing at this time to reject the proposal outright and wants to give it further consideration, it should not act hastily.

A thirty-day comment period is inadequate for a measure that proposes a change that is not just financial, but impacts the stability and vibrancy of our community. As discussed above, though simple on its face, it is far-reaching and drastic in its results. That requires a heavy burden of proof, involving a thorough examination of its implications in a way members can understand.

For the Board to forge ahead on approving it would disregard GHI's rich tradition of member involvement and democratic practice. We trust that the Board, should it decide to keep this issue alive, will find a way to conduct a thorough review that involves the entire community.

82. 4/1/2021

I am writing to express my concern regarding the recommendation that GHI charge members fees for permit processing.

The reasons for my concern are:

- 1. There has been no indication that the additional revenue will be used to improve the technology and level of service provided to members during the permitting process.
- 2. The additional cost could dissuade members from making *permitted* improvements. Landscape projects that worsen drainage issues. Interior projects that create new hazards. The increased risk of *unpermitted* modifications will ultimately cost GHI more time and money in addressing the problems than might be earned through fees.
- 3. The rising cost of updating GHI homes might turn away potential homebuyers willing to try co-op and small-home living. The Washington region's current low inventory of homes is a prime opportunity to appeal to buyers who are flexible and ready to renovate a GHI home into a space that fully meets their needs. Making the permitting process more expensive (without providing value for money) might be enough reason for a buyer to keep looking.

If GHI continues along the path of charging permit fees, I certainly hope (but do not expect) the Board to articulate exactly how the members will benefit from paying more money for this service.

83. 4/2/2021

This is absolutely an outrageous proposal. If you make these financial changes these homes will become run down shacks or residents will go to businesses that are not reliable to fix their properties. Are you going to reduce the monthly coop fee? Mine is \$710 per month. I am a senior citizens. Hopefully, retiring in the near future. If you continue to raise the monthly coop fee and then apply these exuberant high permit fees my retiring will not be happening. A few residents in my court are already on a fixed income.

These homes are old and these fixtures need to be replaced. The electrical plugs are so old the they can't keep a freshener plug warm.

Are trying to get rid of the senior citizen residents? There are few homes in my court that go up for sale after a year. Then the others are renting to whomever which I thought was not allowed. Also, several different folks are sharing the home to keep up with the payments. This starts a transient court that becomes not safe. This was

		one of my reasons for staying and raising my family here was safety and having life long neighbors. I hope you do not decide to add these high proposed fees. This will be a burden on most residents.
84.	4/2/2021	I would like to register my comments on the proposed GHI permit fees.
		I feel that \$300 permit fees for lesser items such as a shed, rain barrel, new appliance or light fixture is excessive. If the purpose of the fee is to have members comply with the permit regulations, this is not the right way to do it. Even with refunding \$200 after the project is finished, a \$100 fee to install a storage shed or light fixture at my home is excessive. The cost of the fixture could be between \$50 and \$100 and if you need someone to install (either via GHI fee for service or professional), you can add at least another \$100 to the project. Members continue to ignore the GHI regulations rather than pay such a high fee for a relative low-cost project. I would support a smaller fee of \$25 for a permit for these types of items.
		As I have not put an addition on my house, I cannot attest as to how excessive is the \$800 fee or 2% of the cost of a new addition for a permit. If the purpose of the fee is to help equalize the amount of time spent by the Technical Services staff on member permit requests and projects, I would suggest it would be better to start with more member education on the permit process, improve the GHI website and GHI handbook regarding the rules and regulations and better interactions and cooperation between GHI members and GHI staff.
		Both sides of the coin need to work together to improve our cooperative and I do not need either side is right or wrong in this matter. I believe this is a case of communications breaking down.
85.	4/2/2021	We do not support the proposed permit fee schedule.
		It is reasonable to charge some fees for the permitting process. However, the proposed schedule is burdensome and will cause more people to avoid seeking a GHI permit (and likely will lead to more "off the books" projects). Instead of the one size fits all approach, we recommend collecting small fees for decks and sheds (\$50 to \$100) and

to collect a large fee for an addition (\$250 to \$500) and not issue refunds.

We all live together and we all use different GHI resources to different degrees. Part of having a housing cooperative is that we must allow members to adapt and change units to their needs as their lives change. This is foundational to the meaning of housing. For example, we are in the middle of a drastic transition to work-from-home arrangements and now many households have to find the space for two adults to work at full time at home inside very small units. We should be helping people make improvements and make the process easier, not more burdensome or unreasonably expensive.

Finally, we believe that making the permit process faster and more transparent will lead to better adherence to GHI rules and regulations and member satisfaction around the permit process.

86. 4/2/2021 Dear General Manager, BOD, Finance Committee, and others,

Thank you for the opportunity to submit comments on the Proposal to Institute Charges for Processing GHI Permits.

I oppose the proposal and highly doubt it will "motivate members to comply with the GHI inspection process." In practice, it is likely to discourage members from submitting to the process.

The fees as proposed for minor projects/improvements (not additions) are excessive and punitive.

The proposal does not include data to substantiate the Committee's "considerations" regarding "considerable" staff time reviewing permits (which should be a routine part of staff duties, not an extra duty requiring a fee payment); on members failing to contact staff for inspections; etc. Staff "feelings" (which, unfortunately are often

condescending) about member behavior are an insufficient basis for establishing new rules and fees.

The proposal does not address major contributing factors to problems with the permit/inspection process: the lack of clear, consistent, and timely information on the permit process--both on the website, on the paper forms, and

		from GHI staff. Improvements in the permit process management, including updating and standardizing all written guidance on the web and on paper and establishing guidelines for staff handling of the process, will likely contribute to more members to adhere to the permitting process.
87.	4/2/2021	To the manager and the Board:
		I raise my voice to concur with the comments and proposal submitted by Tom and Johanna Jones, submitted previously to the Board.
		The permitting system does need a careful and intelligent review. The current permit fee portal is unacceptable.
		Clearly, fees are not an unreasonable requirement for permits for work on one's GHI coop, but they need to be carefully assessed and applied to similar work.
		Currently, there is so much confusion about the need for permits for work, the scope of the review, the timeline, if any, for completion of a project. As suggested, GHI needs to provide: (1) a clear statement of the structures for which permits are required and its reference to the by-laws of the GHI; (2) the person to whom all permits need to be forwarded; and, (3) the time lines for review and issuance of permits and completion inspections.
		A simple list of the scope of projects/structures requiring permits would be a first step in any process that goes forward.
		It would be reasonable to have a designated point person at the office through which all permits are submitted and who is responsible for sign-off for final inspection. This person would be responsible for developing common forms for a variety of permits requirements. In addition, there should be a library/master file of past permit issuance so that GHI members could investigate what types of structures, etc. have been approved, and rejected. This would eliminate many errors or oversights included in new permit submission.
		While part of the rationale for imposing large fees for permits seems to be re-inspection, it seems to be blind to the practices of other governmental agencies which base

permit cost on cost of projects, or standard fees for small common projects.

In addition, it is also not uncommon for contractors to seek the building permits for projects to other governmental entities, as well as for these individuals to get the certificate of completion/occupancy for their client. If this is the need by GHI, it could be made a condition of the issuance of the completion certificate.

Time lines and limits should be developed for a variety of permit types. Clearly the size/placement of storage sheds and fencing should not take the same amount of time to review as additions which affect GHI ownership of the structures.

It is premature to vote to accept the offered fee schedule. The proposal needs more time for review and debate.

4/2/2021 88.

I have followed with much interest the discussion regarding instituting fees for permits for home improvements, and am wholly against this proposal.

Hopefully soon, I will be embarking on a large renovation project on my home. In speaking with a local contractor, he warned me of the extensively long and arduous permit process with GHI. He said that some contractors charge an additional \$4,000 just for the time it takes to get the appropriate permits. It is my understanding from numerous members who have embarked on this journey that the issue is often neither the contractors nor the supposed non-compliant members, but the staff. I watched this exact scenario unfold before my own eyes. My neighbor first applied for a permit to repair a portion of her porch roof in late November of 2020. The staff member responsible for inspections and issuance of permits did not acknowledge or reply to the request until the member followed up in January. It has been a difficult process with increasingly expensive demands, i.e. an engineering study to modify the roof and architectural drawings. She was also told that she would have to re-shingle the entire addition roof. Only after requesting Board intervention (because she had planned to sell) did she finally get a final answer as to what needed to be done in accordance with GHI rules – more than 4 months after she applied for her permit. She nearly lost her contractor in the meanwhile. (As an aside, she was told that the extended roof overran her neighbor's home and would have to be moved back. Interestingly, GHI inspectors didn't

take issue with this or anything else about this porch roof when she bought the house.)

"The Finance Committee considered that staff spends a considerable amount of time reviewing permits that only benefit the members who submit those permit requests."

The Finance Committee seems to be looking at this issue from only one perspective – staff hours. Given the scenario above, I cannot imagine how many staff hours were wasted unnecessarily on this project. I understand the issue of contractors and members skirting around the permit process in order to get jobs done. However, I cannot believe that a licensed contractor would jeopardize their license status and proceed to do any type of renovations without the appropriate permits. And, any member who would allow this should be sanctioned in some way as this affects our entire cooperative. Additionally, the Committee intimates that the members should be navigating the permit system, not the contractors. I completely disagree. In my case, my renovations will be extensive, and I have absolutely no idea how any of this works and what is needed to obtain a permit. The last thing I want is to have to keep going back and forth between the permit office and my contractor. Now THAT would be a huge waste of staff hours. Also, the added cost of the numerous permits I will need for my project would be onerous.

Furthermore, to say that the members are the only ones who benefit from improving their properties is outlandish and insulting. We live in a 1600 unit COOPERATIVE. We all have a vested interest in the upkeep and improvement of the cooperative as a whole. Most people who live here (in my humble opinion) are of modest means and are looking for, among other things, affordable, decent housing. We have rules and bylaws in place in order to maintain a certain level of living, hence the reason we are not permitted to rent out our homes. We live here and are a part of a community. We take pride in the fact that we've maintained this cooperative for over 80 years! Why would we want to allow shoddy and defective workmanship to jeopardize that or the safety and comfort of our families? This affects the entire community. It's a domino effect. Yes, there are always a few bad apples that appear to spoil the bunch. Punishing the whole community because of a few non-compliant members is incredibly unfair. Address and fine these members directly. To institute across-the-board fees – and to say they are "refundable" is a misnomer – is

not fair nor in the spirit on which this cooperative is based. Also, I don't see that charging these fees will change anything. In fact, they have the potential to cause more members to make improvements without GHI knowledge or involvement and avoid the permit process altogether.

On the face of it, charging these fees appears to be another way for GHI to increase income and offset staff costs. This is an insult to the intelligence of the members. As our fees increase every year, services seem to decrease. I believe that there needs to be much more oversight and accountability by the managerial staff and the Board as to what is actually going on in the field. As you know, much information is exchanged between members both in person and on social media. I am well aware that the Board cannot and should not discuss personnel issues with members. But, I will say that before placing all of the blame on the members for the issues with the permit process, maybe someone should address the issues caused directly by the responsible staff member.

Thank you for the opportunity to voice my opinions and your dedication to the betterment of the cooperative.

89. 4/2/2021

I have read the committee proposal and the letter from Tom and Johanna Jones concerning permit fees. I worry that these views are very far apart.

I believe that the prudent course of action is to delay for a year any decision regarding the proposed imposition of fees and, during that time, to undertake some of the website suggestions proposed by Tom and Johanna Jones and some of their proposed metrics to provide the data with which to make an informed decision.

While many of the suggestions for updating the GHI website are clearly reasonable what is not clear to me is whether permits cluster so cleanly into the proposed common types. Metrics could resolve this issue.

Metrics themselves carry a cost and so care should be taken to ensure that the data gathered will indeed be useful. and is easily gathered.

If a tracking mechanism is not already in place then a simple spreadsheet with one line per permit application could hold the data that would support all but the last of

Joneses proposed metrics. The fields in the spreadsheet might be: (Application number);(Application type I,II, III); (Free form description of improvement to be made), date fields paired with action categories: for instance (Date received at GHI)(Complete vs Incomplete) (Date of initial staff ruling)(Ruling category) (Date of permit resolution)(Resolution category) (A field holding a history list tracking the flow chart path and actions) This field would be a series of pairs of the form (Date of action) (Action category) and would be updated with (Date of last action)(Last action category) appended when an action event occurs. A final pair of fields could hold (Estimated date of next action, Next action category) It is not clear to me how to easily estimate the staff time Perhaps the proposed history list field above could hold a sequence of event triples rather than pairs where the third element of the triple would hold an estimation of staff man-hours for the event. My thanks to the finance committee, Tom and Johanna Jones, and the staff for addressing this issue. 90. 4/2/2021 At this time, the permitting process is so broken, talking about charging money for it is heaping injury upon injury to householders. Even were it not broken, that members upgrade their homes at their own expense is a tremendous benefit to the community, and should be encouraged, made easier, not harder. (I do think Tech Services is trying hard and with good intent, from my experience, but it's not working well.) In considering this and every other policy and practice that affects GHI member householders, I would suggest a basic precept for consideration—any time we make rules and practices that make it harder to live here, that reduce member flexibility, that take from member's freedom and power that they would have living in a non-coop home, we should weigh whatever that thing is and make sure it's worth it, that we're reducing members' freedom and power over their lives and home for a good enough reason, that the balance is it will help us to achieve our deeply held values as a community, that it reduces a member

householder's freedom for the protection and freedom of other members, whatever it is, that it is for a highly valued and worthy cause. All society is a balance between rules and freedom. You can't drive on the wrong side of the street (unless you live far enough out that there is no wrong side), and you can't play your trumpet at midnight (not if you live near others)—for good and sufficient reasons. Let us always every time make sure they are good sufficient reasons, or not do it. And let us review all of our policies, rules, and practices to see where we are restricting members without good and sufficient reason and let us remove those things.

I would suggest a second base guideline for finance. And that is, any extra fee to individual members for specific purposes shall be projected to collect among the people who will pay it sufficient to reduce what all members pay month by month in a noticeable amount (not 19 cents). Some of you would remember that years and years ago I served on the Finance Committee for a while. One of the things that shocked me then was seeing the group go down a list of small member fees (garages, parking boats, etc.) let's raise this one \$2, let's raise this one \$4—without that analysis, just randomly, let's raise stuff. (No one was interested in discussing the base of what we were doing, people wanted to get done and go home; and I have to say I wanted that too.) We member householders all feel like we pay a lot every month, and being nickeled and dimed for every little extra feels like crap. If those extra fees for those who use more services add up to enough to make a noticeable difference for those who scrape by to make their monthly payment, so be it. But not randomly, not without due consideration each and every time.

I don't actually think that is the motivation for this. I 'm guessing it might be a misguided attempt to fix the broken system by reducing the influx of permit requests—the exact opposite of making things better for those of limited means, who then would be even less likely to be able to make small upgrades.

I actually wouldn't care if we have moderate fees for big projects, additions, moving walls, maybe big plumbing and big electrical--ilf, and it's a big if, the broken parts of the system get fixed first. It's a big big big IF. I find the refundable fees kind of offensive and patronizing. I think GHI needs to really review and eliminate most GHI permits for things that the County does not require permits for. I do not think small projects (that then still do require a permit) should have a fee, and I think they should turn around within a week. I think there should be penalties for GHI

(yes, I know that's all of us) when the permit deadlines aren't met, even to the extent of permits being automatically approved maybe. I think others have documented a lot and eloquently. I meant to go on to talk about my history with this and how things have evolved, good things, bad things, but this probably has gone on long enough or too long. I've gotten many permits in my 11-1/2 years here, all of which I have used, I believe. The following is an email I wrote to Tech Services in December 2019. "I would like to ask a clarification. I understand that you need plans and details for mid-size internal projects, things involving walls and such – although the amount of such has increased extremely in the time I've been here, compared to the two other good sized internal projects I've done in this house, and the time to get a permit has greatly increased.

"But apparently you are requiring drawings for the most minor and straightforward of modifications. You added drawings to my request to add two light fixtures—even though I think clearly the drawings made things more confusing, and it's hard to comprehend how they could have been necessary for something so straightforward. Moving a spigot 18 inches is such a minor thing that I doubt either a GHI permit or a Prince Georges County permit is needed for it, and I am at a loss as to why you would need a drawing (although I will provide one).

"These things are possible for me—but I think they put minor modifications of this kind out of reach of a high percentage of the membership. Not all members have computers or technical skills or drawing skills, nor the energy or bandwidth to accommodate this kind of thing, and I can only think on the one hand it makes a barrier to members improving their quality of life in minor ways and on the other it encourages us to do more and more without permits (plus obviously it greatly increases the cost of having work done in GHI and reduces the pool of contractors willing to work here). What's the reasoning behind this? I ask you now, because if the Town Hall on Thursday does have the Q&A component that our other Town Hall's have (I'm not sure where my agenda is at the moment), I will ask about this. It's a pretty major change (as I know personally, having done many projects big (mediumbig) and small over 10 years), and it wasn't even announced to the membership, much less run by the membership for feedback. So I'd be interested to know the reasoning behind it, that offsets the negative impact."

4/2/2021

Hi Manager's office,

I want to comment on the proposals of fee for processing permits for improvements to GHI units.

Here are my points:

First, I do not agree permits only benefit the members submitting the permits requests. While that member may enjoy the benefit of a kitchen renovation or such, improving GHI homes eventually benefit the entire community. The unit can be sold at a higher price. The buyer is happier with not having to do a lot of improving. Nicer; updated homes benefit all of us.

I think one reason GHI members assign these tasks to contractors is because they can be cumbersome. It is on the reason I haven't done the kitchen and bathroom renovation I have wanted to do. I have sat through numerous GHI board meetings where the Architecture review committee has been very kicky and it is tough for the member to get even a minor improvement approved.

I believe our coop fee should cover the permit process. If contractors/members are not having their unit inspected after the work, I think this should be handled in another way.

I actually thought things have gotten better with the permit and renovations that have taken place in GHI over the past few years, so I was surprise to see this proposal in my GHI-E news.

I think this proposal will cause members to either do the work without GHI's permission or delay doing the work.

I think if GHI management and Board decide to charge a fee than the fee should be fully refunded after the work is inspected.

Maybe at the upcoming May annual meeting, GHI management should show how much staffs' salaries and time is going towards reviewing permits and the costs. Members may be more agreeable if it would lower coop fees.

Again, I believe members improving their properties beyond what the GHI management and Board requires, benefits all of us.

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92.	4/2/2021	Dear GHI Board,
		While I am sympathetic to the demands the permit process places on staff, I do not think a permit fee should be \$300/\$800. A reasonable fee would be acceptable (I couldn't find the current fee structure on the website or in the handbook.) Having compliant work done on our cooperatively owned units benefits everyone over time.
		From what I can tell reading the various comments and positions expressed by other members, it seems that much of the problems results from either confusion regarding the requirements/process or a general disregard of the requirements/process – a problem that affects more than permits.
		I think GHI does need to address the confusion that members feel about the permit process. I found the information found in the handbook available on line reasonably helpful – tho some of the information about what type of minor improvements have been removed. I found the search function connected to the GHI website not as much, e.g The process flow chart referenced in the permit form is unavailable. I would think continued effort made to educate the members would be beneficial and ultimately reduce staff time. Perhaps a permit orientation video or FAQ sheet might?. Clarity and transparency will benefit all involved: members, neighbors, contractors – and future GHI member/owners.
		PS I do support are fines for those who disregard GHI requirements, fines that are levied when discovered or upon resale. The fact of and rationale for these fines should be published and reitertated; ignorance or our policies should not be an excuse.
93.	4/2/2021	I oppose the GHI Finance Committee proposal for new \$300–\$800 permit fees in the strongest terms. The proposal is outrageous! I agree wholeheartedly with Tom and Johanna Jones' comments! They could not have said it better.
94.	4/2/2021	Regarding the proposed Permit Fees, I think that the fees are outrageous and inappropriate. I strongly support the comments and recommendations of GHI members Tom and Johanna Jones.

4/3/2021 95. Dear Management Office, PLEASE NOTE: I composed this yesterday and thought I sent it in to you. I just discovered that I never hit the Send button. I hope you accept these comments. Thank you, Michael Hartman (and Lore Rosenthal) **Comments:** Thank you for the opportunity to express our feelings about the proposed permit fees. We oppose the institution of Permit Fees as we believe that those costs should be covered in our Coop Fees. If Permit Fees are established, they should not be draconian as they are now proposed. The fees put forward by the Finance Committee would be excessive and burdensome to members if adopted. We also think that the rules for permits need to be clearly stated in the GHI Website so that members do not have to call staff to clarify simple questions. Having simple procedures and clear guidelines, supplemented with samples of the different kinds of permits will reduce the need for staff to explain them.

To: Finance Committee March 31, 2021

To begin with I am absolutely **opposed** to charging GHI residents for a GHI permit. I understand when making major changes to a house or adding an addition that you need to get approval from GHI and then get permits from the County and City. If someone has made major changes and didn't get permits than they should be penalized. I do not know who came up with the amount of money for the various permits but it is **outrageous**. It is so much more than the County or City permits. I don't believe this is a way to motivate the members. I believe it will have the opposite effect and the members will not try to update their homes. As far as I am concerned this is just another way for GHI to make money off of its members. The Board and GHI should be looking for ways to cut the cost for the members not increase it. The GHI members should have the opportunity to vote on the proposal to institute charges for processing permits.

I read the latest **Greenbelt News Review**, which I have attached, and couldn't understand the list of new or replacements that would need a permit, such as light fixtures, faucets, refrigerators, dishwashers, dimmer switches, etc. If this is true than this is absolutely **ridiculous**!!! To replace an appliance has nothing to do with GHI and most of the other items should be covered under our regular maintenance or fee for service.

In the **GHI newsletter** it mentions the amount of time that staff spends on reviewing permit requests. Isn't this part of their job which they are being paid to do. This is not something new. Members have always had to submit requests for approval of work to be done and management has always reviewed the request and either approved or disapproved the request.

Also, the **GHI newsletter** mentions the need to contact GHI at various intervals for inspection. Why if you have City and County permits do you need GHI to inspect the work when the County sends out inspectors for each aspect of the work such as the foundation, framing, electrical, plumbing, etc. I agree that GHI should inspect once the project is completed and the County has approved the work. I don't believe that GHI needs to spend their time inspecting each item.

I have lived here for 8 years and am completely frustrated with the mentality of the Board, Financial Committee and GHI Management when it comes to charging their members. The cost of the monthly fee just continues to increase every year and we get less service but the employees continue to get increases or bonuses. No one is even thinking about how this community was built to be affordable. The older people here who are on fixed incomes are being driven out. As one of the committee members said to me after I stated that I was really worried about the older people and being able to afford to live here – I was told "If they can't afford to live here than they should move". I guess this must be the way management and the Board feels.

I would suggest that GHI send out a detailed letter of instructions explaining exactly when a member needs to come to GHI for approval of work to be done and what will happen if they have the work done without GHI having approved it. The letter should also explain what is covered under the regular maintenance verses fee for service work. I realize that this information is probably in the handbook but this would be a reminder to everyone especially to those who haven't read the handbook or are new to our community.

First — I'm truly concerned (actually appalled) that during a Pandemic the GHI Board would ask the Finance Committee to recommend fees that GHI could charge for processing permit requests for improvements.

Second - I believe GHI needs to spell out exactly what these 'permit requests for improvements' actually covers. There seems to be some confusion about improvements - is this where members have to get technical services review/approval for electrical and plumbing work if we want to renovate a bathroom/kitchen or maybe put in a patio - or does it cover the repair/replacement of faucets, toilets, wiring, etc, ??

I believe that GHI needs to explain the difference between 'permit requests for improvements' and 'fee for service.' Does a GHI permit replace a city or county permit? If not, it's just an additional burden and cost to the member wanting to improve their home.

If a member doesn't follow the regulations, then that member should be penalized or fined, and GHI should not place a financial burden on all the members.

Third - If this is such a problem for GHI then maybe GHI should 'publish' a summary or key points of certain regulations or periodic reminders identifying the type of work requiring GHI's review, inspection, and approval, and GHI should hi-light the penalty or fee if the procedures are not followed. I believe that it is outrageous to automatically charge each member a permit fee. I compare the 'GHI permit fee' to the fees for speed cameras – they started out supposedly to improve safety but the cameras really ended up making money for the city coffers – the same as I see the permit fees making money for GHI.

Fourth – The statement 'refundable inspection fee' implies that the member will get the entire fee returned to them when in fact the member will only receive \$200.00 out of the \$300.00 they originally paid. What will GHI do with the \$100.00 they keep from the permit fee?? How does GHI justify keeping any of the 'refundable inspection fee'?? What else would these employees be working on??

I can't even imagine what the Finance Committee was thinking when they came up with the unjustified and highly expensive cost of the permit for a new addition. Not only will GHI discourage members from improving/updating their homes, but GHI is making the co-op so expensive that young couples and elderly couples won't be able to afford living in 'old' Greenbelt.

I do not support this proposal and believe that GHI can and should do a better job informing members of the various processes/procedures and the consequences of not following the regulations.

I believe that the proposal for 'Charges for Processing GHI Permits" is excessive and unnecessary and should be brought before the members and have the members vote on it and not the GHI Board.

GHI Finance Committee c/o Managers Office 1 Hamilton Place Greenbelt MD 20770

Cc: Eldon Ralph, Neron Adams-Escalera, GHI Board, Audit Committee

Dear Finance Committee,

Thank you for considering member comments before making a decision about new permit fees. Our feedback is below, including a detailed proposal for Permit Reform.¹ We thank everyone whose ideas, concerns, and experiences are included in this proposal, including Facebook discussion participants and many friends including present and former GHI members.

Summary

We object in the strongest possible terms to any attempt by the Board and Finance Committee to impose massive new permit fees in a misguided attempt to address their own persistent failure to properly manage the GHI permit system. The 1,600 members of GHI own our cooperative. We deserve adequate GHI customer service as we improve our homes and community—not punitive fees for trying to follow the rules.

Problem Statement

GHI once had a functioning permit system, but something has gone very wrong in recent years. Having endured the permitting process when we built our patio last summer, we agree the current process needs improvement. However, we define the problem very differently from the Board and Finance Committee:

- 1) **Slow and capricious bureaucracy:** Neighbors who experienced the GHI permit bureaucracy complain it's cumbersome, changing its mind erratically and sometimes forcing members to spend large sums of member money and time on project modifications later assessed as superfluous. One exasperated former member reported that GHI lost their application but could not even confirm the paperwork was missing for two months.²
- 2) **Missing and confusing documentation:** When members try to determine whether a project even requires a permit, the website is contradictory, incomplete, and confusing.³ Downloadable permit forms are misleading⁴ and broken.⁵ For example, Technical Services

¹ We hesitated to provide such blunt feedback as follows, but we're shocked to learn how many other members have similar experiences.

² This neighbor has since moved to an adjacent street outside GHI, largely to avoid the permit process on a subsequent project they'd already begun planning.

³ See details on pages 1 and 21–22 of our patio permit application at http://spril.com/GHIPermit/

⁴ Example: the Type II permit form declares it covers "appliances," yet no permit is needed to replace an appliance like a microwave or humidifier. The website has no clear indication whether refrigerators, stoves, or dishwashers require permits, but staff claim they do. Decks have a permit form and handbook section, but both are silent about patios.

⁵ Example: Step 1 at the top of the Type I, II, and III Permit forms refers to a "process flowchart" explaining the permit process. On all three forms, this link leads to "Page not found".

staff tell members that permits are now required to replace appliances like dishwashers, refrigerators, and stoves. Yet we've talked to 1 current and 2 recent Board members unaware of this policy—even though they're responsible for setting such policies.

- 3) Lack of accountability: When we pointed out these website errors and omissions to staff, committee members, and the board, we were repeatedly told it was somehow our fault we trusted the website. This officious "blame the victim" approach is extraordinarily poor customer service. We were told the only way to obtain accurate information is to speak directly to staff. It's no surprise that forcing members to call staff to learn the "real" information consumes a great deal of member and staff time for each project, creating a crisis of wasted staff time that these fees purport to correct.
- 4) **Ever-expanding rules:** Any contact between members and staff can result in the spontaneous generation of an entirely new type of permit that did not previously exist. One example above is the "appliances" permits that came into existence without Board knowledge. In March 2021, a member posted to Facebook that staff declared that permits and neighbor permission are suddenly required for raised garden beds, and issued her a stop work order pending ARC and Board review. Only after she mounted a public campaign against this capricious new permit expansion was she told a permit is actually not required. Even so, she noted "it sounds like they want to make it a requirement for raised garden beds in the future"
- 5) **Missing permit information:** Once members learn which permit(s) are required, information about the documentation required for the permit application is *also* missing. With zero information about patio permits published on any GHI form, manual, or instructions, we were forced to repeatedly call and email staff, consuming even more time. It felt like Technical Services concealed their rules and processes, doling them in morsels during one-on-one conversations.
- 6) **Slow staff response:** Staff work long hours, but it's never enough when their role includes personally relaying so much information that could be provided far better on the website. We found staff often promised timely responses—yet repeatedly failed to meet their self-declared deadlines while spending inordinate time compensating for the defective website. After seeing our patio application repeatedly stall, a neighbor recommended we call staff nearly every day to avoid further delays. We can only imagine the time consumed for a more complex project such as a bathroom or addition.

⁶ March 26 Facebook post to Unofficial GHI Group of Greenbelt https://facebook.com/groups/816192378416291: "So, I've been told that I need to fill out a permit for my raised beds, all of my neighbors in my court need to write letters (emails aren't sufficient) and that this might need to go to the board (he wasn't sure). I was also told that I couldn't use leaves as mulch in my garden area or the area under my large tree. Does anyone know if all of this is accurate?" Two days later: "I'm asking for photos of raised beds in GHI yards (especially those in front yards, but any will help). I've been told that my raised bed request (made because I was told by a GHI employee that I need one, not because I asked, and who wasn't sure if my permit would need to go before the board, because apparently they haven't gotten any of them) will have to go before the Architectural Review Committee (ARC) which is 'not keen on setting precedent' according to this same employee."... "I was told that raised beds are a major improvement and therefore I need a permit. I'm not to work on them until the ARC meeting on the 14th."

⁷ Ibid, posted one day later "Update: GHI has decided that I don't need a permit, but it sounds like they want to make it a requirement for raised garden beds in the future, so we may need to watch for proposals from the board and make sure that there is member input."

7) **Disliked and subverted by members:** Member respect for the GHI permit process is extremely low⁸ and members fear retribution during the lengthy process. Several members told us it's a mistake to submit *any* application, and they ignore permit rules to sidestep the bureaucratic nightmare. In social media and private conversations, members coach each other to avoid the GHI permit quagmire.⁹

GHI has developed an artisanal permit submission process that is absurdly wasteful—of time and money—and inefficient, requiring every member receive extensive one-on-one counseling just to navigate the process without violating unspoken and undocumented rules.¹⁰

This problem costs more than just wasted time and mounting frustration. At a party, we met someone very interested in GHI membership but changed her mind when others related their permit nightmares; she soon bought a home elsewhere. We know at least two families who had been fully engaged in the coop but moved out of GHI largely because the permit process is so intolerable. If young families represent the future of GHI, driving them out jeopardizes the survival of the cooperative in coming decades.

We love cooperative living and speak proudly of the many benefits of living in GHI—except GHI's member-hostile permit process. Modifying one's home to suite one's needs *should* be a selling point of GHI. But, like many others, we advise prospective members to avoid the fundamental mistake of buying a GHI home expecting to modify it, as that is a proven recipe for years of co-op induced agony.

GHI consists of 1,600 old homes, many of which would benefit from upgrades. Members who upgrade are doing the cooperative a favor by improving our neighborhood. Instead of encouraging livability and long-term loyalty through home improvement, GHI policy punishes member efforts with a widely-loathed permit process.

• "It's also causing some to not make needed improvements. I agree that the permitting process takes entirely too long. My neighbor has been trying since November to get an improvement permit. She's told different things each time they come out."

• "I have not gone through the permit process. But I know from SO MANY OTHERS that it is a nightmare. The website is abysmal and beyond useless."

"The committees influence the board too much, and the committees are too focused on personal agendas instead of what pleases the majority of the members. I tried to change the rigidness of the door style allowed by GHI and I attended a board meeting for this purpose. The architect committee attended also to oppose me. I found out one person on the architect committee wanted all the doors to be similar and she was holding sway over the entire committee and over the board. It was appalling to discover this. And it discouraged me from any further activity to appeal to the board for changes."

⁸ Recent comments at the Facebook Unofficial GHI Group:

^{• &}quot;It's been an enormous year-plus ordeal and has shaken my faith in our community. I'm also a no-grit millennial crybaby so that's probably a factor. Good luck."

^{• &}quot;The real issue is how broken the permitting process is. This appears to be a cynical attempt to lower the number of permits that have to be processed by putting a financial hurdle in front of GHI Members."

 [&]quot;Just do it. If not forbidden in rule book don't ask."

^{• &}quot;You ask them and they will say you need a permit to sneeze."

⁹ Example Facebook comment: "If you ask, they'll say you need a permit and you'll put in all that effort and then you'll wait for months probably. Just don't ask."

¹⁰ And our project was just a patio! Patios are among the most common GHI projects, simple enough the City and County don't require any permit. After submitting our 25-page permit application (http://spril.com/GHIPermit/) June 16, 2020 and navigating GHI's confusing permit rules in over a dozen conversations with Technical Services, we received approval 112 days later on October 6 after ARC and Board review. We can only imagine the agonizing months and years needed for a more complex project like an addition.

Finance Committee Proposal: Huge New Fees

GHI leadership seems completely unaware of the above issues and seeks to address a completely different problem. The March 8 E-News said the Finance Committee is focused on member compliance: "It was felt that a refundable inspection fee may motivate members to comply with the GHI inspection process." To solve this problem, the Finance Committee proposes charging members an exorbitant new set of fees:

- \$300 for any GHI permit except for a new addition.
- For a new addition: \$800 or 2% of the cost for a new addition (whichever is greater).
- When a project is completed and final inspections, \$200 of the fee is refundable.

As described above, the GHI bureaucracy is already incredibly frustrating, and this proposal seems calculated to make it yet more frustrating by billing members hundreds of dollars for their frustration. Even worse are the punitive effects:

- 1. The proposed fees would accomplish the opposite of their stated goal. The Finance Committee claims their goal is encouraging GHI members to complete the permit process. However, a large new fee will intrinsically produce the opposite effect. Institutions apply fees to behaviors they wish to discourage, like illegal parking and speeding. Imposing new fees for compliance with inspection requirements will clearly incentivize members to ignore and subvert permit rules more than they already do.
- 2. **The proposed fees are wildly excessive.** The Finance Committee fees are three to fifteen times higher than permits from Greenbelt¹¹ or Prince George's County¹². GHI also requires permits for far more projects than the City or County, including sheds, patios, dishwashers, stoves, refrigerators, washing machines, dryers, rain barrels, and privacy screens, so the impact on members would be a dramatic permanent hike in the cost of home improvements. You can't seriously expect members to submit \$300 upfront (even if part of the fee can be refunded later) for a permit to replace a light fixture or rain barrel—when the entire project often costs less than \$100.¹³ These proposed fees tower above what neighbors pay throughout Greenbelt, and will add significant regressive cost to GHI members hoping to purchase newer more energy-efficient appliances.

Here is the GHI vision statement, highlighting relevant words:

We will provide **affordable**, well maintained homes in an attractive cooperative community. We will create a **customer-focused** culture in which members and employees are treated with the same level of respect, courtesy and attention that we would personally expect.

Does the Finance Committee believe *fees twelve times higher* than the City are "affordable", especially when GHI fees will sometimes cost more than the entire project? Does the Finance Committee believe it is "customer-focused" to invent new fines solely to force member compliance with the hostile process described above? This Finance Committee Proposal directly violates GHI's vision statement.

[&]quot;City of Greenbelt permits cost \$20 for a fence, \$25 for a deck, electrical, mechanical, or interior alteration: https://www.greenbeltmd.gov/government/departments/planning-community-development/schedule-of-fees-bonds-and-fines

¹² County permits cost \$25 for a light fixture, \$115 for a deck, \$340+ for an addition, with no permit required for fences 4 feet high or shorter. https://www.princegeorgescountymd.gov/DocumentCenter/View/23559/

¹³ Rain barrels cost \$75 in the 2017 City of Greenbelt program, and for many a \$75 rebate covered that entire cost: https://www.greenbeltmd.gov/Home/ShowDocument?id=920

At some future time, modest permit fees for large projects may be an effective approach. But huge fees for small projects are outrageous, especially as the Finance Committee has made no apparent attempt to reduce the expense and inefficiency of operating GHI's current permit regime. We can do better.

Our Proposal: Permit Reform

To reform the permit system, we need carrots instead of sticks. Instead of deliberately making GHI membership more expensive and less pleasant, we propose improving the process to save money and reduce member aggravation. Let's change the current culture from member hostility to member service!

We propose the following 5 specific reforms:

- 1. **Update the GHI website.** GHI Permit staff currently perform two jobs: processing permit applications and filling the information gap left by the incomplete, wrong, and poorly organized website (and paper documentation). Staff can do their job better if the website does its job better:
 - a. Remove and update contradictory and incorrect information.
 - b. Fix broken links.
 - c. Provide a clear list of when a permit is, and is not, required.
 - d. Provide and maintain checklists of information members must submit or processes they must follow for all common types of projects. These should include patios, decks, fences, ceiling fans, electrical outlets, rain barrels, privacy screens, and additions.
 - e. For these common projects, provide examples of completed applications (with personal information redacted) that meet GHI expectations and were rapidly approved, as templates for new applications.
 - f. Update out-of-date permit forms to reflect current rules—not rules of decades past.

Members and staff should use the same reference tools to increase transparency and consistency. Staff should use website content as their primary manual to guide implementation of GHI policies and rules, not their own interpretation. Most critically, subject matter experts need to update the website as a routine part of their work responsibilities. We also hope the new property management system will make updating information easier on staff, and finding information easier on members.

We support the ongoing member initiative to rewrite the Member Handbook. However, our concerns are far deeper, impacting policies, procedures, and culture.

This pro-active communication plan will dramatically reduce staff time answering the same questions over and over, while also reducing member frustration. The current process forces each permit-seeking member to painstakingly glean how to create a successful application through repeated conversations and iterative application submissions. With a checklist and sample permit application, members will quickly figure out what's needed for rapid approval. Once members are empowered to submit complete applications, staff will spend far less time rejecting incomplete applications and personally coaching individual members.

2. **Establish and publish clear, verifiable commitments,** such as "Members submitting applications for Type I or II permits should expect a response within 2 work weeks."

3. **Standardize staff procedures** to reduce chronic inconsistency. With processes and rules maintained only in staff memories, they keep changing—these shifting sands infuriate members trying to invest in the co-op. A GHI inspector insists members re-open their new wall, without realizing GHI's electrician has already certified what's inside. Members rework their project to accommodate an unwritten insulation requirement, only for staff to change their mind after forcing the members to waste thousands of dollars. Members submit what they believe is a complete application, only to be bombarded by a series of subsequent requests for additional material that should have been foreseen and requested upfront.

Non-standardized procedures make it impossible for other staff to fill in when someone is out. When new employees join the team, they can't replicate established practices, so random changes can ripple through permits and inspections. If an employee leaves unexpectedly, remaining staff must scramble to patch gaping holes in the workflow. Imagine a staffer quit unexpectedly, the only one with access to a critical resource like building diagrams. Panic would ensue while everything stops.

In other cases, unstandardized procedures result in conflicting documentation for a particular house, with no one able to reconcile the conflict. This can add needless costs for members and contractors.

Management practices must be modernized. Just as surgical checklists ensure medical supplies aren't left inside patients, process checklists can ensure members get everything they need for a successful application. When a gap is identified, the checklist is updated and fixed for future projects. Process improvement means the system gets better over time—instead of continually reinventing the wheel and struggling to keep things from getting worse.

Process improvement can start by addressing problems raised by the loudest, most frustrated members—the only ones heard now. But other members' experiences are invaluable. Member Services could play a key role by gathering feedback as projects complete and identifying room for improvement. Someday, maybe a secret shopper program could optimize a well-oiled Technical Services machine. These practices are long-established standard procedure in modern organizations, and GHI needs to join the party.

4. Track and publish annual key metrics including:

- a. average number of calendar days between permit submission and initial staff ruling
- b. average number of calendar days from initial submission to permit approval
- c. total numbers of permit applications approved, rejected, and withdrawn
- d. numbers of applications approved, and rejected, by technical services staff
- e. number of applications recommended for approval, and for rejection, by the Architectural Review Committee (ARC)
- f. number of applications for which the Board overrides ARC
- g. number of applications for which the Board approves exceptions to published rules
- h. approximate total hours staff spend processing permits, and total cost to the membership

These metrics will enable GHI management, the Board, and the Membership to assess and improve the permit process over time. This data may also help overcome GHI's long-standing tendency to add more rules and permit categories year after year. We must consider the cost in staff time and impact on members instead of mindlessly piling ever more work onto already-overburdened staff and members.

Our impression is the Board spends considerable time assessing and overruling decisions made at lower levels by staff and committees—and even the Board's own prior decisions enshrined in the Member Handbook. In a well-functioning system, these overruling exceptions would be rare, because they are expensive: members perceive the system unfairly favors those with confidence, clout, and time to argue; overruled staff and volunteers are demoralized by their wasted effort enforcing policies jettisoned upon appeal; and massive amounts of board, volunteer, staff, and member time are expended solely to create conflict. We have also witnessed the Board spend countless hours arguing over picayune details such as whether brown fences are more offensive to the eye than green fences, and every imaginable detail about sheds. 14 We believe exception requests should be considered opportunities to improve the policy for everyone—far more often than to create a special rule for exactly one home while different rules apply to the other 1,599. For example, the continual need to approve serviceside bike sheds indicates a policy change allowing bicycle commuters easy access to roads. Over time, this will save Committees and the Board considerable time debating exceptions—and save members even more when they won't have to wait weeks or months for meetings at which their exceptions can be reviewed.

5. **Perform a Cost-Benefit Review of Permit Types** and eliminate unjustifiable permit requirements. When you have a hammer, everything looks like a nail. When you have a permit bureaucracy, every project looks like a threat¹⁵ and every applicant looks like a scoundrel from whom tribute must be extracted. Over the years, whenever something undesirable happens, GHI adds a new permit, a new rule, a new form, a new process, a new fee. GHI bureaucracy expands even when *nothing* happens—like the bizarre 2010 ban on cattle and sheep ranching in GHI,¹⁶ even though the Board and staff admitted no resident has ever attempted livestock ranching.

Over the decades, added permits, rules, fees, forms, and processes accumulate like a hoarder's attic to reduce our quality of life. They cost time from members, volunteers, and staff to maintain, dispute, and enforce. They cost money from members as contractors talk of charging GHI members higher prices to compensate for excessive risk and hassle dealing with the ever-growing bureaucracy. GHI has a bad reputation among contractors. Forcing members to submit an additional \$300, \$800, or more for every permit would be a giant step in the wrong direction.

Let's take steps in the *right* direction. Eliminate the (alleged) requirement for a permit to install a replacement appliance—and replace it with an optional review of electrical capacity. Review every other type of permit to assess whether its benefits outweigh its costs. If a Boxwood resident builds a fence that violates code, they have to fix it—but compliance is *free*. If a Lakeside resident installs a refrigerator that trips the circuit breaker, they have to fix it—but compliance is *free*. We propose bureaucracy reduction by eliminating low-value permits altogether, replacing them with improved communication and enforcement of

¹⁴ **This problem has grown to endanger the heart of GHI self-governance:** With each passing year as board meetings grow longer, more frequent, and more frustrating, willing board candidates grow scarcer and scarcer. This is a serious and growing problem experienced by the Nominations & Elections Committee, of which Tom is Chair.

¹⁵ During our permit hearing, one Architectural Review Committee (ARC) member speculated our 19-inch tall stone bench constructed by a licensed contractor might "fall on a toddler" as a special concern for the inspector. We're pleased to report the bench remains secured in place, and the toddlers of Greenbelt remain safe in its vicinity.

¹⁶ GHI Member Handbook §XV.B.13: "No person shall own, keep or harbor an agricultural or farm animal within GHI, as defined by Prince George's County law. This includes, but is not limited to, all livestock, poultry, horses, cattle, sheep and swine." https://www.ghi.coop/content/xv-companion-animals

violations as we already do for overgrown hedges or a house painted in purple and orange stripes: if a member refuses to fix a violation after reasonable notification, charge fee-for-service rates for remediation. With this approach, the few scofflaws would pay about the same amount as their fees under the Finance Committee proposal, but the vast majority of members would save hundreds of dollars, and staff would save countless hours. **Punitive fees should be assessed on the few who violate rules, not the majority who follow them.**

We strongly support GHI inspections for substantial construction, including all additions and inside-the-wall electrical and plumbing work. This proposal would focus inspections where they're needed, on such justifiable projects.

We challenge the Finance Committee, Board, and staff to work with members on the vision of an affordable, customer-focused, simplified cooperative process, then create structures to support this vision.

Conclusion

Please do not let this punitive and ineffective proposal advance any further. While modest permit fees may someday be appropriate, large fees now would only exacerbate and feed the broken system. We thank you for your service, and request you also consider our proposed permit reform, which we submit with the goal of making our cooperative stronger and a better place to live. We remain committed to our community and will gladly discuss any questions.

Sincerely,