



To Honorable County Council Members
Honorable Steve Ehlmann, County Executive

July 18, 2018

The Community Development - Building and Code Enforcement Division examination opened January 19, 2018, has been completed, and the final report is being issued today. The scope of the review covered January 1, 2015 – December 31, 2017. Fieldwork for the review was completed on March 16, 2018, and our report reflects the results of work performed through that date. Responses were requested for by April 20th and received on July 16, 2018.

The objectives of the review were to determine whether internal controls were adequate and effective, operations and records were in compliance with established standards, regulations, policies and procedures, and resources were being used efficiently.

The examination covered permits and inspections, contractor licensing, building and property code violation inspections, fee collection and accounting, municipal contracts, and all related Division processes and activities. We reviewed the internal control environment surrounding those activities, as well as performed an evaluation of the effectiveness and efficiency with which department objectives are being achieved. In addition, reviews for compliance with the County Charter and Ordinances, Missouri Statutes, and internal policies and procedures were performed.

This audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*, and consisted of examining, on a test basis, sufficient evidence to afford a reasonable basis, for our opinion.

In our opinion, except for the opportunities included in this report, internal controls were adequate and effective, and operations and records were in compliance with established standards.

The issuance of this report completes the formal examination process. However, if you wish to discuss any aspects of the audit or report, please contact me.

Brent Statler

Brent R. Statler, CPA, CGAP
County Auditor

Attachment

Copy to Jennifer George, Assistant Director of Administration
Michael Hurlbert, Director of Community Development
Jared Agee, Building and Code Enforcement Division Director



**Community Development - Building and Code Enforcement
Division
Examination Report
Opened January 19, 2018**

Scope: 1/1/15 – 12/31/17

Table of Contents

I. Background and Introduction	1
Authority and Activity.....	1
Funding.....	2
Staffing.....	3
II. Status Board.....	4
III. Executive Summary.....	7
IV. Detailed Findings.....	8
Compliance Opportunities.....	8
Control Opportunities.....	12
Interdepartmental Opportunities.....	13

BACKGROUND AND INTRODUCTION

Authority and Activity:

Authorized by Chapter 132 of the County Code, the Building and Code Enforcement Division of the Community Development Department was created in 2016 by combining the former Building Code Enforcement Division and the Neighborhood Preservation Division. The Division is comprised of Building Inspectors, Code Enforcement Inspectors, Plan Review Engineers, and support staff.

Building Inspectors seek to identify and prevent all hazards related to the design, erection, repair, removal, demolition, or use and occupancy of buildings, structures, and premises in unincorporated areas. This work is accomplished through the review of building construction plans, construction inspections, and enforcement of county building codes and regulations which set safety standards for all aspects of building construction, including structural, fire, plumbing, electrical, and mechanical system.

Code Enforcement Inspectors are responsible for enforcing existing structure ordinances and nuisance ordinances throughout unincorporated St. Charles County and contracted municipalities. Enforcement is accomplished by random and citizen-driven inspections with the most common violations being rubbish, weeds and tall grass, derelict and/or unlicensed vehicles, general building disrepair, and zoning violations. Property owners found to be in violation of an ordinance are notified and given a timetable to correct the violation. If the violation still exists upon completion of the correction period, ticketing procedures are initiated, and the case is sent to the County Counselor to try in the Municipal Court.

The Division also processes licenses for electricians, plumbers, mechanical work (HVAC), drainlayers, 3rd party inspectors, blasters, and pool installers, inspects areas for the spread of Johnson grass (and other noxious weeds) for the Weed Control Board, and biannually inspects creeks, waterways, and sewers, along with investigating all reports of illicit discharge into those areas, as part of the state-required monitoring for the County's MS4 permit.

St. Charles County is currently using the 2015 International Residential Code, 2015 International Building Code, 2015 International Plumbing Code, 2015 International Mechanical Code, 2015 International Fire Code, and 2015 National Electric Code to set safety standards for all aspects of building construction and the 2009 International Property Maintenance Code as the minimum standard for which county properties need to be maintained. These codes have been modified slightly by County Ordinance.

The Building and Code Enforcement Division's program mission as stated in the 2018 budget is as follows:

<p>The mission of the building division is to effectively serve the citizens of St. Charles County by ensuring the health, safety and welfare of the public. This is accomplished by building and code enforcement actions relative to the various county code and ordinances pertaining to building, zoning and health regulations. 2018 budget, pg. 88.</p>

Funding:

The primary funding for Building and Code Enforcement Division is provided by the general revenue fund. The historical funding for the Building and Code Enforcement Division is presented below.

Community Development - Building and Code Enforcement Division General Revenue Fund – Expenditures Fiscal Years 2013-2018								
Fiscal Year	Salaries & Benefits	% Increase	Operating Expenditures	% Increase	Capital Expenditures†	% Increase	Total Expenditures	% Increase
2013^	\$1,209,383	N/A	\$105,612	N/A	\$728	N/A	\$1,315,723	N/A
2014^	\$1,311,419	8.4%	\$102,062	-3.4%	\$0	-100.0%	\$1,413,481	7.4%
2015^	\$1,411,696	7.6%	\$98,074	-3.9%	\$599	100.0%	\$1,510,369	6.9%
2016^	\$1,442,585	2.2%	\$66,609	-32.1%	\$0	-100.0%	\$1,509,194	-0.1%
2017	\$1,360,320	-5.7%	\$65,604	-1.5%	\$0	0.0%	\$1,425,924	-5.5%
2018*	\$1,453,760	6.9%	\$87,600	33.5%	\$16,450	100.0%	\$1,557,810	9.2%

Revenues generated by the Building and Code Enforcement Division are deposited in the general revenue fund. The historical funding is presented below:

Community Development - Building and Code Enforcement Division General Revenue Fund – Revenues Fiscal Years 2013-2018							
Fiscal Year	Permits	Licenses	Construction Management Commission	Municipal Contracts	Abatements	Total Revenue	Division Revenue as a Percentage of Expenditures
2013 [^]	\$1,164,213	\$111,389	\$31,808	\$17,286	\$161,378	\$1,486,074	112.9%
2014 [^]	\$964,067	\$135,705	\$176,512	\$11,274	\$51,192	\$1,338,750	94.7%
2015 [^]	\$942,823	\$126,735	\$9,036	\$9,834	\$138,607	\$1,227,035	81.2%
2016 [^]	\$844,063	\$120,214	\$0	\$14,828	(\$9,610)	\$949,495	64.2%
2017	\$1,400,155	\$151,060	\$0	\$15,303	\$34,870	\$1,601,388	112.3%
2018*	\$1,050,000	\$120,000	\$0	\$12,000	\$40,000	\$1,222,000	78.4%

* These are the approved budget amounts from the 2018 budget.

[^] Combines amounts from the former Building Code Enforcement and Neighborhood Preservation Divisions.

[†] Includes amounts from the Capital Projects Fund (301).

Staffing:

The number of full-time equivalent authorized positions for the Building and Code Enforcement Division remained constant at 20.0 full-time budgeted positions from 2013 to 2018.

Note: The 2013 amount includes budgeted positions for the formers Building Code Enforcement and Neighborhood Preservation Divisions.

II. STATUS BOARD

The status board provides a summary of the Building and Code Enforcement Division’s functions and processes. Each cell located under a function represents an activity that is to be completed to ensure that the process is performed in an effective and efficient manner. The color of the cells represents the assessment regarding completion of the activity. The legend below gives a description of the definition of each color.

- Red indicates management's immediate attention is required.
- Yellow indicates an opportunity for improvement exists.
- Green indicates there is current no action necessary.
- Blue indicates a process that was not included in the scope of the review.
- Grey indicates a County issue that should be addressed by management but is not necessarily a direct responsibility of the audited department/office.

Permits	Permit Inspections	Professional Licensing	Occupancy Permits	Private Waste Disposal Systems	Administrative/ Miscellaneous Functions
Permits are required for work done related structural work (building, electric, mechanical, plumbing), blasting, burning, demolition, and fireworks displays.	Inspections are required at various stages of the project to ensure code compliance.	The County licenses professional contractors for electrical, plumbing, mechanical, pool, drain layer and blasting work.	To ensure code compliance, an occupancy permit must be obtained prior to opening a business or for a change in ownership or tenancy.	Construction for new septic systems or major repairs/remodeling require a building permit and inspections.	Payroll
Permits are applied for in-person or online using the Citizenserve portal. In-person applications will be entered into Citizenserve by Division staff.	After an application is approved, Inspectors are assigned to permits in Citizenserve based on area.	Applicants submit a completed application, documentation, and fee payment. Applications are submitted in-person or online using the Citizenserve portal.	Completed applications are submitted along with a zoning verification letter.	A soil permeability test from a licensed company must be obtained prior to repairs or new construction.	Purchasing
Applications may also require building/site plans to be submitted depending on the permit type.	Customers call the Division or use the Citizenserve portal to schedule inspections and re-inspections; 24-hour notice is required.	Documentation includes a photo, proof of insurance, bonding, and ICC/State test scores.	The information is entered into Citizenserve and a fee, based on the size of the structure, is collected.	Customers submit the permit application, soil test results, and a plan drawing with all information entered into Citizenserve.	Fee Reconciliation and Deposit
Clerical staff reviews submitted applications to ensure that all required information and documentation are included.	Inspections are documented in Citizenserve with documentation/photos added as necessary.	All information is entered/scanned into Citizenserve.	The applicant must schedule a facility inspection within 90 days, providing at least 24-hours’ notice.	The application and plans are reviewed for reasonableness; a site inspection may be necessary prior to approval.	Credit Card Processing

Permits	Permit Inspections	Professional Licensing	Occupancy Permits	Private Waste Disposal Systems	Administrative/Miscellaneous Functions
Plan Reviewers review applications to ensure that projects meet code requirements and any cost estimates are reasonable.	Field correction notices are issued for failed inspections, explaining the problems noted and how they can be corrected.	License and processing fees must be paid to receive the license, with the fee amount set based on the type of license.	If modifications will be made to the structure or a sign will be added, the proper permits must be obtained.	Owners can install the system on their own if they pass (75%) a Division-issued test; otherwise a licensed contractor must be used.	Building Commission (C1)
Permits fees are set by County Code by set fee or by using a multiplier calculation. (B1)	The permit is closed in Citizenseve after a final inspection is passed.	License expiration dates and renewal fees vary based on the type of license.	The fire district and County Health (food service only) may also need to be contacted for inspections.	Inspections required for construction are Layout /Design, Tank & Fill, Septic Filter & Motor Installation, and Final.	Weed Control Board & Johnson Grass Inspections (C1)
After the application is approved, customers pay the permit fee in-person or online to receive the permit.		Renewal notices are sent 4-6 weeks prior to the expiration date.	The permit is issued after all inspections are completed and permit is closed in Citizenseve.	Passing the final inspection approves the system for use and the permit is closed in Citizenseve.	Illicit Discharge and Creek Monitoring for the County's MS4 Permit (C3)
Permits are valid for one year and can be extended by 30 days if requested.		Non-renewed licenses become inactive and a fee is charged for the customer to reactivate the license.	A temporary permit may be issued for projects that are not complete but meet all safety requirements.	An operating permit is also required for septic systems.	Municipal Contracts for Inspection Services
Permits are suspended after 180 days of inactivity with Citizenseve tracking activity dates.		License holders can choose to inactivate their license for up to 6 months for a fee.		Owners submit an application, executed service & maintenance agreement, contractor certification, and fee. (A1 & A2)	Uniform Allowance
Suspended permits can be reinstated by paying a \$100 fee.		Licenses inactive for 2 or more cycles require reapplication.		Service agreements must require at least bi-annual inspections, with results sent to the Division.	Change Funds
Tourist Camp Permit: An application and site plan must be submitted for camps, including trailer parks, campgrounds, etc.				A licensed 3 rd party inspector must inspect a system prior to an ownership transfer.	Bad Checks
				If repairs are required, a signed affidavit and escrow account may be needed.	Refunds

Ordinance Violation Investigations	Abatements	Ticket Issuance	Notice of Unsafe Structure	Vehicle Removal	Mobile/ Manufactured Home Inspections
A citizen files a complaint or Inspector notices potential violations.	Abatements are used for violations (weeds, rubbish, board up, etc.) not corrected by the owner.	Tickets are issued for violations not corrected after a Notice of Violation was issued.	Notices are issued for unlawful or unsafe structures not fit for occupancy.	Inspectors cite violations for cars that are unlicensed, in disrepair or parked in violation of zoning laws.	Inspectors review mobile/ manufactured homes to ensure compliance with federal and state regulations.
A case file is created in the Division's Citizenserve program.	An owner issued a Notice of Violation has 4 days to correct violations.	Inspector reviews the property to ensure the violation still exists.	The notice must contain specific info and be posted on the property.	A Notice of Violations is given to the owner and placed on the vehicle.	Alterations to the home must be certified by a licensed engineer.
The case is assigned to an Inspector based on the property location.	If uncorrected after 4 days, a hearing is held to declare a nuisance violation.	Inspector requests NPD Director approval to issue a ticket.	The notice must be served to the owner and all parties having an interest in the structure.	If still in violation after 7 days, a compliance hearing is held.	Alterations without an engineer seal of approval are subject to fines.
Inspector researches and visits the property, taking notes and photos.	Owner has 2 days to correct the nuisance violation, immediately if declared an emergency.	Approved tickets are issued for each violation.	Work to correct the problems of the structure must begin within 30 days.	Minutes or the hearing are posted on the vehicle.	If the alteration affects the home's structural integrity, it may be condemned.
Inspector discusses any violations with the owner or leaves a door hanger with contact info.	If still uncorrected after 2 days, a company is contacted for the abatement.	The ticket is mailed to the owner and 2 copies are sent to the County Counselor.	If work is not started after 30 days or repair is deemed too costly, a hearing is held to order demolition.	The Police Dept. is contacted to remove the non-compliant vehicle.	
Violations must be corrected by the re-inspection date.	The County supervises and pays the contractor for the work performed.	Tickets are issued through and tracked in Citizenserve.	The owner can challenge the order to demolish.	The Police Dept. notifies NPD when the removal is complete.	
The case file is updated in Citizenserve. Any photos are also added to the file.	The County sends an invoice for the abatement to the property owner.	Counselor handles all legal matters for the case.	Costs for repair or demolition at County expense are assessed against the property.	All case records are updated in Citizenserve.	
If the violation is uncorrected, a Notice of Violation is issued, and ticketing procedures are started.	If the invoice is unpaid, a lien is placed on the property.	Inspections continue to ensure the violation still exists.			
A Notice of Violation may be delayed if the owner is making progress towards correction.		Citizenserve is updated as needed.			

III. EXECUTIVE SUMMARY

Following is a summary of opportunities for improvement which were noted during our review of the Building and Code Enforcement Division:

A. Compliance Opportunities

1. Private Sewage Disposal Permit Fee: The Division is not charging the operating permit application fee and the Private Sewage Disposal Code reference is outdated.
2. Septic System Inspections and Maintenance Agreements: The Building and Code Enforcement Division does not require service and maintenance agreements or biennial inspections for private sewage disposal systems.
3. Employee Professional Licensing and Training: Three (60.0%) out of five employees reviewed do not hold stated certifications for their position.

B. Control Opportunities

1. Permit Fee Multiplier: Documentation used by the Division to calculate the total annual construction value used for the permit fee multiplier formula was not retained.

C. Interdepartmental Opportunities

1. County Boards: The Weed Board and Building Commission were not meeting as required by County Ordinances and members are serving on expired terms.
2. Fee Waiver: The Building and Code Enforcement Division waived building permit fees for a home construction project that did not involve Habitat for Humanity.
3. MS4 Permit Creek Inspections: Through February 15, 2018, 2016 was the last time creek monitoring occurred.

Compliance - Private Sewage Disposal Permit Fee

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>The County adopted the 2015 International Private Sewage Disposal Code as the standard for septic systems in the County. Construction for new septic systems or major repairs/remodeling of an existing system requires the property owner to obtain a building permit and have the work inspected and approved by the Building and Code Enforcement Division. The Waste Water Systems Inspector performs all inspections for the County and for several contracted municipalities.</p> <p>County Code Section 505.020.D.1.d(1) The Division of Building and Code Enforcement shall charge the following fees for permits issued under the Private Sewage Disposal Code, Section 500.080 of this Title: Sixty dollars (\$60.00). (1) For installation of a residential private sewage disposal system: One hundred fifty dollars (\$150.00) or the estimated cost of construction multiplied by the "Permit Fee Multiplier" in Section 505.020(A)(2)(c) of this Chapter, whichever is greater.</p>	<p>During a review of Private Sewage Disposal Permit Fees, the following was noted:</p> <ol style="list-style-type: none"> 1) The Division is charging the \$150 fee (or higher based on construction cost) for residential private sewage disposal system construction/repair, while the \$75 operating permit application fee is not charged separately; and 2) The Code refers to the Private Sewage Disposal Code as 500.080, which has been replaced. 	<p>Updated County Code.</p>	<p>The Building and Code Enforcement Division should determine if they should be issuing and charging separate amounts for the operating permit applications and residential private sewage disposal systems or update the Code accordingly. Furthermore, the County Code for Private Sewage Disposal Code should be updated to 500.300</p>	<p>Staff will be reviewing the requirements of the private sewage disposal code and recommend appropriate changes to the County Council.</p>

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>County Code Section 505.020.F The Division of Building and Code Enforcement shall charge the following fee for application for operating permits issued under the Private Sewage Disposal Code, Section 500.080 of this Title: a. Seventy-five dollars (\$75.00).</p>				

Compliance - Septic System Inspections and Maintenance Agreements

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>County Code Section 500.300 requires the owner of any property serviced by a private sewage disposal system (septic system) to obtain an operating permit from the Building and Code Enforcement Division. To receive a permit, the property owner must submit a completed application, a copy of a service and maintenance agreement with a contractor, and the contractor's certification of the agreement.</p> <p>As part of the service and maintenance agreement, contractors must inspect the septic system at least once every two years and report the results of the inspection to the Building Code Enforcement Division. The Division provides a one-page inspection report to be used by the contractors.</p>	<p>The Building and Code Enforcement Division does not require service and maintenance agreements or biennial inspections for private sewage disposal systems.</p> <p><u>Note:</u> The Division does encourage homeowners to check their systems regularly.</p>	<p>Compliance with County Code requirements.</p>	<p>The Building and Code Enforcement Division should determine the necessity of requiring ongoing system inspections and either enforce requirements or update the Code with current practices.</p>	<p>The operating permit requirement has no associated enforcement mechanism, giving the Department no teeth to ensure compliance. The Department will review the private sewage disposal code and recommend appropriate changes to the County Council.</p>

Compliance - Employee Professional Licensing and Training

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>As listed in job descriptions, some Building and Code Enforcement Division employees are required to hold certifications. Certifications are earned through the International Code Council (ICC) and require yearly training to maintain them.</p>	<p>Three (60.0%) out of five employees reviewed do not hold stated certifications for their position.</p> <p><u>Note 1:</u> Two employees had additional certifications which might be equivalent to the listed certifications.</p> <p><u>Note 2:</u> An employee had all certifications expire due to the number of attended training hours; however, the required training is currently scheduled.</p>	<p>Compliance with County and Division policies.</p>	<p>The Building and Code Enforcement Division should ensure that employees have and maintain all required certifications. If the certifications are not necessary for a position's performance, then the job description should be altered.</p>	<p>Beginning in 2016, the Division of Building and Code Enforcement has placed an emphasis on training and maintenance of certifications. As codes change overtime, certification and training level requirements have also changed. In the past year, the Division has made significant improvements to training and certification. This effort will continue until positions are consistent with their respective job description.</p>

Control - Permit Fee Multiplier

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>As stated in County Code Section 505.020, the Building and Code Enforcement Division uses a permit fee multiplier to calculate the fee charged for building permits. Use of the formula is recommended by the International Code Council, which provides instructions on how to determine the multiplier (also included in Section 505.020.A). The multiplier is calculated by multiplying the Building and Code Enforcement Division's total budget by the percent of the Division's budget expected to be provided by building permit revenue. This figure is then divided by the total annual construction value within the County in the previous year. The total annual construction value is calculated using the sum of each building's value (Gross Area * Sq. Ft. Construction Cost). The Code stipulates that the Building and Code Enforcement Division Director shall compute the permit fee multiplier annually and publish it in the Division office and on the County website by January 30th.</p>	<p>Documentation used by the Division to calculate the total annual construction value used for the permit fee multiplier formula was not retained.</p> <p><u>Note:</u> The Division continued to use the existing 2016 multiplier for 2017 and 2018.</p>	<p>Opportunity for improved documentation.</p>	<p>The Building and Code Enforcement Division should retain documentation for each value used in the formula to calculate the building permit fee multiplier.</p>	<p>The Permit Fee Multiplier calculations were performed and checked, but Management acknowledges that outlined calculation steps were not retained. In the future, the Division will ensure those documents are retained.</p>

Interdepartmental – County Boards

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>The Building and Code Enforcement Division has two County Boards (Weed Control Board and Building Commission) that provide aid and/or direction.</p> <p>A November 1976 election established the St. Charles County Weed Board to help control Johnson grass and other noxious weeds to prevent regrowth and re-infestation within the county. The Board is comprised of three members recommended to staggered three-year teams by the County Executive and approved by the State. The Board operates under the rules listed in Code Section 120 and 420.040.</p> <p>County Code Sections 500.810-.900 establishes a nine (9) member County Building Commission which has powers to develop, prepare, and recommend to the County Executive and County Council for adoption by ordinance any code necessary for promoting public safety, health and general welfare, protecting life and property, and preventing the construction of fire hazardous buildings in the unincorporated</p>	<p>The following was noted in a review of the boards, the following was noted:</p> <p><u>Weed Board</u></p> <p>1) It appears that the Board has not held a meeting or filed meeting minutes with the County Registrar since at least 2013;</p> <p><u>Building Commission</u></p> <p>2) The Commission is not meeting quarterly, but at least annually; and</p> <p>3) All current appointed members' (8) terms have expired.</p>	<p>Compliance with the County Code.</p>	<p>The County should determine if:</p> <p>1) Ensure that boards are meeting periodically or as required by County Code; and</p> <p><u>Note:</u> Determine if Boards can comply with Code requirements by posting that a meeting will not be held due to a lack of business.</p> <p>2) Replace board members within a reasonable time upon term expiration.</p>	<p>The County consistently works to try and find individuals who find Johnson grass to be an issue of concern. The current members of the board have not had reason to meet. The weed board's existence is a product of state statute and to eliminate a Johnson grass extermination area requires a vote of the people.</p> <p>The duties of the Building Commission are limited by 500.900 OSCCMo to the recommendation of new code adoption and the hearing of appeals of decisions of the Chief Code Enforcement Officer regarding the manner of construction or materials used in the erection, alteration or repair of a building or structure. The County has historically adopted every other code revision, causing a need to review code updates every 6 years. If the Commission has an appeal before it, the Commission will meet; however, if no appeals are before the body, the</p>

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>County. Each member shall be a representative from a different building/construction trade serving a three-year term along with one member from the County Council.</p> <p>The Commission shall meet regularly, at least quarterly, for the purpose of the transaction of its business and meet specially as needed.</p>				<p>Commission has no business to regularly conduct.</p> <p>Staff will recommend amendment of the ordinances to remove the requirement to meet quarterly, unless there is business before the body.</p>

Interdepartmental – Fee Waiver

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>County Code Section 505.040 states, "...the County shall waive the permit and inspection fees for the construction of affordable housing by Habitat for Humanity. The County Council hereby finds and declares a public purpose exists in the construction and sale of such housing by Habitat for Humanity. The County Director of the Division of Building and Code Enforcement shall be authorized to grant permits for and authorize inspection of residential construction by Habitat for Humanity, without requiring the payment of such fees. Additionally, any fees paid prior to May 26, 1999, shall be refunded."</p>	<p>The Building and Code Enforcement Division waived building permit fees for a home construction project that did not involve Habitat for Humanity.</p> <p><u>Note 1:</u> The project was related to a charitable effort.</p> <p><u>Note 2:</u> Administration authorized the waiver.</p>	<p>Compliance with the County Code.</p>	<p>The County should determine if current ordinances permit waiving of such fees and if not establish a process to allow fee waivers for other charitable efforts (i.e. Council approval or modify county code).</p>	<p>Various aspects of the development code already allow for waiving of fees by the divisions of the Department, however, those authorities are inconsistent. The Department will send forward an ordinance to Council proposing a change that will allow for waiver of building permit fees in instances of not-for-profits building or retrofitting homes for disabled military and first responders injured in the line of duty.</p>

Interdepartmental - MS4 Permit Creek Inspections

Discussion and Background	Cause	Risk/Effect	Recommendation	Management Response
<p>As part of the County's Municipal Separate Storm Sewer System (MS4) Stormwater Management Permit activities, the Inspectors from the Building and Code Enforcement Division perform monitoring activities on four creeks: Big Creek, McCoy Creek, Peruque Creek, and Dardenne Creek. Monitoring is done in January and May from different locations around the creeks. The results of the monitoring are sent to the Development Review Division and incorporated into Appendix B-3 of the biennial MS4 Stormwater Management Plan Report.</p> <p>The most recent report was submitted on February 28, 2017, and covered activities through December 31, 2016. The next report is due in February 2019 and will cover years 2017 and 2018.</p>	<p>Through February 15, 2018, 2016 was the last time creek monitoring occurred.</p> <p><u>Note:</u> The last MS4 report submitted stated that the County would be re-evaluating and re-prioritizing creek screening sites for 2017.</p>	<p>Compliance with permit requirements</p>	<p>Divisions within the Community Development Department should finalize creek screening procedures to ensure continued compliance with the MS4 Permit.</p>	<p>The MS4 permit for St. Charles County was recently updated and the previous permit in which the Creek Screening procedure was developed ended. The Development Review Division is currently working on reviewing requirements associated with the new permit and updating associated procedures—including any creek screening activities. Once the new procedures are outlined, a new policy regarding frequency, location, and other parameters will be defined.</p>