

# **Office of City Auditor**

**Seattle's Special Events Permitting Process:  
Successes and Opportunities**

**January 31, 2008**



## City of Seattle Office of City Auditor

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### **Mission**

To make City government as efficient, effective, equitable, and accountable as possible.

### **Background**

Seattle voters established our office by a 1991 amendment to the City Charter. The Office is an independent department within the Legislative branch of City government. The City Auditor reports to the City Council and has a four-year term to ensure his/her independence in selecting and reporting on audit projects.

Internal auditing, as defined by The Institute of Internal Auditing, is:

an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to the evaluation and improvement of the effectiveness of risk management, control, and governance processes.

### **How We Ensure Quality**

The Office's work is performed in accordance with auditing standards issued by the Comptroller General of the United States and the Institute of Internal Auditors. These standards provide guidelines for staff training, audit planning, fieldwork, quality control systems, and reporting of results. In addition, the standards require that external auditors review our Office to ensure that we adhere to these professional standards.

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City of Seattle  
Office of City Auditor

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Susan Cohen, City Auditor

January 31, 2008

The Honorable Greg Nickels  
Seattle City Councilmembers  
City of Seattle  
Seattle, Washington 98104-1876

Dear Mayor Nickels and City Councilmembers:

Attached is our audit of the City of Seattle's special events permitting process. We determined that the City's special events permitting process is generally effective in ensuring that the multitude of ways the City must interact with special events occurs relatively successfully. The special events permitting process is meeting its mission and goals and is generally effective in meeting the needs of its stakeholders.

We appreciate the excellent cooperation received from the Special Events Office and the Special Events Committee members during our review process. If you have any questions regarding this report or would like additional information, please call me at 233-1093 or Megumi Sumitani at 233-1096. To improve our work, we ask our readers to complete and return the evaluation form at the back of this report.

Sincerely,

A handwritten signature in cursive script that reads "Susan Cohen".

Susan Cohen  
City Auditor

Enclosure

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Additional Documents (These additional documents are available on our website at <http://www.seattle.gov/audit/>)

## I: Special Events Web Survey

- Special Events Web Survey Methodology
- Web Survey Responses
- Profile of Web Survey Respondents
- Auditors' Note about the Web Survey Comments
- Zoomerang Web Survey Results and Comments

## II: Sample Fee Analysis

- Exhibit I: 2006 Base Fee Schedule per Day of Event
- Exhibit II: Average Number of Permits and 2006 Fees  
for a Sample of 20 Special Event Permits

## III: Compliance Profile of 59 Sample Applications

- Were applications received 90 days prior to the planned event?
- Was the permit fee payment received before issuance of the Special Event Permit?
- Was proof of insurance certification received prior to the issuance of the Special Event Permit?
- Was the permit fee payment transferred to Parks Department Accounting in a timely manner?

## IV: Sample Selection Methodology and List of Sample Projects in Analysis

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## **I. Introduction**

In summer 2006, controversy arose regarding the Hempfest event held annually at Myrtle Edwards Park. This created bad feelings between the Seattle Art Museum and Hempfest, and both groups, in discussion with City officials, while blaming each other, also believed that the City's special events permitting process deserved part of the blame. Because of this, several City Councilmembers requested a performance audit of the special events permitting process. Specific questions raised by the Councilmembers were whether: staffing levels are adequate to review permit applications; follow-up (lessons learned) after the event takes place; and the special event permit process is working to mitigate the impacts of an event and let neighborhoods know that a special event is scheduled.

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## **II. Objectives, Scope, and Methodology**

We conducted this performance audit to determine the effectiveness of the City of Seattle's special events permitting process. The objectives of our audit included:

- To determine, in light of the Seattle Hempfest/Seattle Art Museum conflict, if the special events permitting process was adequately managed;
- To determine the extent to which the special events permitting process is meeting its mission (purposes and goals);
- To determine the extent to which the special events permitting process is effective in meeting the needs of its stakeholders; and
- To identify areas for improvement.

We reviewed the program in the following three areas: 1) overall legal compliance relative to composition of the Special Events Committee, responsibilities/activities administrative provisions, and permit application processing; 2) meeting of program purpose and goals, and 3) process clarity and effectiveness to its stakeholders.

The scope of our audit was limited to the Special Events Office and Special Events Committee's compliance with established City code and guidelines in reviewing and approving permit applications received in 2006<sup>1</sup>, and in effectively coordinating the process and public services necessary to ensure that events occur safely and smoothly. We did not include a review of the Seattle Hempfest/Seattle Art Museum controversy, but rather looked at a sample of other events permitted in 2006 to determine if similar problems and concerns occurred.

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<sup>1</sup> Our scope did not include the 10 commercial vessels permits issued by the Special Events Office in 2006.

During the audit, we performed the following procedures:

- Researched legislative requirements, the Special Events Office Handbook, program information, and other background information related to the special events permitting process;
- Completed more than 30 interviews with key City, County and State managers, staff and representatives to the Special Events Committee, including a citizen representative to the Committee;
- Analyzed a sample of 59 Special Event Permit applications submitted and reviewed in 2006 for compliance with established code provisions and other guidelines governing special events in Seattle;
- Determined whether permits and fees, in addition to the Special Event Permit, were required in 2006 based on a review of 20 Special Event Permit applications;
- Conducted a Web survey of 2006 permit applicants and obtained a response and feedback from 59 applicants regarding their experience with the Special Event Permit review and approval process;
- Attended monthly Special Events Committee meetings between October 2006 and August 2007.

In addition, we developed a Program Matrix (Table II, page 8) that reviews the Special Events Office's performance in relation to legal mandates, program guidelines, and other responsibilities outlined in Seattle Municipal Code 15.52. The matrix also contains performance information from Committee members, permit applicants, and other stakeholders regarding the effectiveness of the special events permitting processes and practices.

We conducted the audit fieldwork between October 2006 and July 2007, in accordance with generally accepted government auditing standards.

In addition to this audit report, we prepared the following additional documents related to this project which are available on our website at <http://www.seattle.gov/audit/>:

I. Special Events Web Survey

- Special Events Web Survey Methodology
- Web Survey Responses
- Profile of Web Survey Respondents
- Auditors' Note about the Web Survey Comments
- Zoomerang Web Survey Results

II. Sample Fee Analysis

III. Compliance Profile of 59 Sample Applications

- Were applications received 90 days prior to the planned event?
- Were applications reviewed within 60 days of receipt?
- Was the permit fee payment received before issuance of the Special Event Permit?
- Was proof of insurance certification received prior to the issuance of the Special Event Permit?

- Was the permit fee payment transferred to Parks Department Accounting in a timely manner?

#### IV. Sample Selection Methodology & List of Sample Projects in Analysis

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### III. Background

Seattle residents have a longstanding tradition of celebrating history, community and current events. The City of Seattle has played an important role in actively supporting the neighborhoods and community groups that organize these “special events.” Special events, which range from street fairs and festivals to concerts and sporting events, serve to bring together celebrants with diverse interests and backgrounds. The magnitude of special events participation varies considerably, ranging from 50 or more people who annually attend parades, races, and other sponsored activities, to the more than 250,000 participants who celebrate the three-day Seafair Hydroplane and Airshow event.

Coordination for citywide special events dates back to the late 1970s and early 1980s. Recognizing the importance of these events in contributing to a sense of community and public engagement, the City of Seattle formalized the Special Events Committee by ordinance in 1991. The special events coordination function is budgeted in the Parks department with a staff of two people (one full time administrative staff and a half time Coordinator) comprising what is known as the “Special Events Office.” The primary mission of the Special Events Office is to assist public and private organizers and city departments in planning and scheduling events, as well as coordinating city services and resources, so events can occur safely and smoothly. The Office also issues Special Event Permits; establishes conditions to mitigate the impacts of major events on municipal and neighborhood resources;<sup>2</sup> and assesses and collects permit fees.

When the City Council adopted Ordinance 115982 in 1991, it also required a “special event” permit for “any event in a park or public place that is reasonably anticipated to require police personnel in order to provide crowd or traffic control”<sup>3</sup>. The Ordinance also established a Special Events Committee comprised of City, King County, and State of Washington representatives to coordinate the governmental services for events in parks or public places that required police services for crowd or traffic control. These provisions were codified in the Seattle Municipal Code, Chapter 15.52 but subsequently modified by Ordinance 120631.

Many events in parks require only a Department of Parks and Recreation parks use permit. Many events in streets or other public places require only a Seattle Department of Transportation street use permit. Some events require no permit. However, some

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<sup>2</sup> One important purpose of the Special Event Permit process is to assist event organizers in exercising their constitutional rights balanced with the City’s right to regulate the time, place, and manner of special events to protect public health and safety, to reduce adverse impacts on public place and neighboring areas, and to protect the right of other users of our public places.

<sup>3</sup> Ordinance 120631 (adopted November 2001) which updated the 1991 Ordinance 115982 provides for exceptions where there is a written agreement between the City and an event sponsor, organizer, or other party (e.g. sports teams such as the Mariners, Seahawks, and UW football) covering the same matters.

events that are reasonably expected to 1) cause or result in more than 50 people gathering in a park or public place, 2) have a substantial impact on such park or public place, and 3) require the provision of substantial public services need to obtain a Special Event Permit. Such events, called special events, require considerable advance planning by the City and other governmental agencies, in order to adequately protect public safety and property and to reduce adverse impacts on the public place and upon neighbors and other users of our public places.

Such events are subject to the City's Special Events Ordinances 115982 and 120631 (Seattle Municipal City Chapter 15.52).<sup>4</sup> Citywide special events include a variety of events, including art festivals, food events, concerts, sporting activities, walks, parades, and other gatherings, including constitutionally-protected events. The latter is defined by SMC 15.52.050E as an event exercising political and religious activities<sup>5</sup>, and although they require a Special Event Permit, no permit fee is charged. Smaller events that are held in a public place –such as block parties– with an expected attendance of 50 or less, and that do not need additional public services, do not require a Special Event Permit but would require a street use permit from the Seattle Department of Transportation<sup>6</sup>.

Ordinance 120631<sup>7</sup>, adopted in response to recommendations of a Special Events Task Force assembled after the tragic loss of life and dozens of arrests during the 2001 Mardi Gras celebration<sup>8</sup>, amended the City Code to:

- establish the definition of a “special event”;
- provide further clarification of the powers of the Special Events Committee (SMC 15.52.030);
- clarify when a Special Event Permit is required (SMC 15.52.040); and
- modify provisions in Ordinance 115982 relative to processing, denying, and revoking a Special Event Permit (SMC 15.52.060), and providing for additional administrative review of a permit denial when requested by the applicant.

The Special Events Office is responsible for coordinating the citywide Special Event Permit review and approval process within the Parks Department. The office coordinates with other applicable City departments and offices such as the Parks Event Scheduling Office, SDOT, Seattle Police Department (SPD), Seattle Fire Department (Fire), Department of Planning and Development (DPD), Department of Neighborhoods (DON), and non-City agencies<sup>9</sup> to issue and collect fees for Special Event Permits. The office

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<sup>4</sup> *Special Events Handbook*

<sup>5</sup> SMC 15.52.050e: When such an event will be an exercise of rights protected by the First and Fourteenth Amendments to the United States Constitution, or Article I, Sections 3, 4, 5, or 11 of the Washington Constitution, the application shall be processed promptly, without charging a fee for political or religious activities or imposing terms or conditions that infringe constitutional freedoms, and in a manner that respects the liberties of applicants and the public.

<sup>6</sup> A Seattle Department of Transportation Street Use Permit is required unless an alternative block party registration process and inspection fee waiver is in place such as for the National Night Out event held annually the first or second Tuesday night in August.

<sup>7</sup> Ordinance 120631 was adopted on November 19, 2001.

<sup>8</sup> The 2001 Mardi Gras celebration was not issued a Special Event Permit.

<sup>9</sup> Examples are the Public Health - Seattle & King County for food worker cards and temporary food service permits and the Washington State Liquor Board for special occasion liquor licenses.

does not issue or collect fees for other permits that an event may require from other City departments or outside agencies, and insurance requirements are handled by the City’s Department of Executive Administration, Risk Management Division.

The citywide special events function is currently staffed by a half-time special events consultant, retained on a contract basis, and a 1.0 FTE administrative support person. The contract special events consultant function was created in 1997, and the current consultant has more than 40 years of experience managing special events for the City. The administrative specialist position was created in 2002.

The Special Events Office is funded under the K2500 Enterprise Division of the Parks Department. The amount of revenue generated through Special Event Permits during the past five years increased from \$278,355 in 2002 to \$360,185 in 2006, or 29 percent. Table I, below, shows revenues received from 2002 through 2006 in 2006 dollars.

<b>Table I Citywide Special Event Permit Applications and Revenues</b>		
<b>Year</b>	<b>Number of Permit Applications</b>	<b>Permit Revenues in 2006 dollars</b>
2006	267	\$360,185
2005	280	\$319,989
2004	266	\$321,153
2003	247	\$325,182
2002	261	\$311,931

Note: Standard permit applications cover day events, Constitutionally Protected events, sporting events, parade events, valet parking and commercial vessels. We did not include permits for commercial vessels in our audit scope; hence they are not included in the number of permit applications in this column.  
Source: Revenue information for the 2002 through 2006 annual reporting periods was provided by the Special Events Office included on an internal events tracking schedule.

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## **IV. Program Review and Potential Areas for Improvement**

### **General Comments**

The City’s special events permitting process is generally effective in ensuring that the multitude of ways the City must interact with special events occurs relatively successfully. The special events permitting process is meeting its mission and goals and is generally effective in meeting the needs of its stakeholders.

We reviewed the City’s special events permitting process in the following areas (see Table II, page 8): Mission and Purpose; Composition of the Special Events Committee; Responsibilities/Activities of the Special Events Committee; Administrative Provisions; Permit Application Processing; and Process Clarity and Process Effectiveness to Stakeholders.

The program is particularly strong in the high level of professionalism and cooperation of Committee members and the Special Events Office in working together to make events happen, as embodied in the “getting to yes” policy. Another area of program strength is the Committee review structure which is efficient and effective for both permit applicants and reviewers. The once per month Committee review provides a convenient, one-stop means for both the applicant and the City to coordinate City responsibilities relative to public safety and traffic with event plans. These program strengths contribute to providing a very favorable environment for encouraging and obtaining citywide Special Event Permits.

This favorable environment for Special Event Permits, however, has the effect of stretching available City resources, particularly for the Seattle Police Department and Department of Transportation in meeting agreed upon resource commitments for the events while fulfilling day-to-day responsibilities. The perception of the process can also be very intimidating to first time permit applicants with little or no experience with City government. We were told that trying to make the case for approving an event permit before ten to fifteen City department and other government representatives, many with questions and concerns about the event plans for security, safety, and traffic control is a daunting challenge. There are three citizen advisory positions (and an alternate) on the Committee to be filled by individuals experienced in organizing special events that are intended to serve as guides/resources for promoters of new events. However, those positions are currently either vacant or inactive.

Another major strength to the program is the Special Events Coordinator’s demonstrated forty plus years of special events leadership experience that includes chairing the Special Events Committee meetings and coordinating the Special Event Permit review process. However, that leadership and institutional memory are tenuous in that the coordinator is a retired former City employee on an annual contract with the City. Currently, there is no one in place with the experience or knowledge to replace this person, nor does the City have a plan to assign a back-up to learn the process to prevent a knowledge gap if the coordinator decided or could not return. In addition, the coordinator and administrative assistant have many permit processing tasks, including effective communications with permit applicants. However, poor fax transmissions and mail delays due to antiquated equipment have sometimes caused frustration among Committee members and permit applicants.

A major weakness of the program is the lack of readily available and easily located information about the program. First-time applicants expressed frustration with finding, obtaining, and understanding permit information. Applicants trying to find information about Special Event Permits on the City’s Web site are diverted to permit information for the Fire, Parks, and SDOT. There is no direct link to the Special Events Office or the procedures for obtaining a Special Event Permit. Currently only SDOT’s Street Use Web site lists the Special Events Coordinator’s name and phone number. Making telephone contact with the Special Events Coordinator results in having questions answered, with the mailing of a detailed information package to the caller. Having a dedicated page for Special Events on the City’s Web site and links to and from other departments to the Special Events page is long overdue. We think such a page with detailed criteria and

information for special events could reduce the number of phone calls to departments and the Special Events Coordinator regarding whether or not a Special Event Permit is needed for a planned activity. Being able to complete and send the application online could also improve the timeliness of application submission, particularly for short notice events, and cut down on questions arising from illegible handwriting on handwritten applications.

Sufficient notification of neighborhoods in advance of planned events was also identified as an area in need of improvement. During interviews with the Department of Neighborhoods (DON), we learned that DON Neighborhood Coordinators receive notice of Special Event Permit applications only days before the Committee reviews the permit applications, and not all Neighborhood District Coordinators are on the distribution list for the monthly updated special events calendar. Although DON is represented at the Special Events Committee meetings, the short notice and lack of an event calendar does not allow Neighborhood Coordinators to obtain neighborhood concerns about an event application and relay them to their committee representative.

### **Potential Areas for Improvement**

We identified a number of potential areas for improvement and consideration, including the following:

- Developing a succession plan for the Special Events Coordinator position (Finding 5),
- Developing a dedicated Web site for the Special Events Office (Finding 6),
- Examining the benefits of an online application process with links to other agencies that require related permits or licenses (Finding 6),
- Developing an InWeb special events system linking City departments and other agencies (Finding 6),
- Posting scheduled special events online for the Department of Neighborhoods and as a courtesy to interested citizens and affected businesses(Finding 6),
- Developing a voluntary new permit orientation program (Finding 4),
- Considering phasing out SDOT’s no-charge policy for “grandfathered” events (Finding 3),
- Revisiting the current requirements for Citizen representatives on the Special Events Committee (Finding 9), and
- Considering adopting an overall City vision for appropriate venues for large special events (Finding 10)

Please see the following section, Findings and Recommendations, for a more detailed discussion of our suggestions and recommendations.

<b>Table II</b>		
<b>SPECIAL EVENTS PROGRAM MATRIX</b>		
	<b>Activities/Requirements/Criterion</b>	<b>Comments</b>
<b>Mission and Purpose</b>		
MP-1	<p>The Special Events Committee provides a process to coordinate governmental services for events in parks or public places that require police for crowd or traffic control; to issue Special Event Permits for such events; to determine appropriate terms and conditions for such permits; or set the applicable fees; and to administer the SMC 15.52 (Crowd Control Events).</p>	<p>The Special Events Committee established by Ordinance 115982 identifies and coordinates governmental services for events in parks or public places that require police for crowd or traffic control; determines the appropriate permit terms and conditions; requires, reviews, and approves security, crowd control and traffic control plans; identifies the appropriate fee or, if applicable, applies a fee exemption or an exclusion for constitutionally protected events; determines the appropriate insurance coverage (with the City as a named insured) that the event must obtain and requires proof of compliance; and works with the applicant and the Police Department to develop an approved security plan.</p>
<b>Composition of the Special Events Committee</b>		
CC-1	<p>The Special Events Committee shall be comprised of the following voting members:</p> <p>A representative of the Mayor, the Budget Director, the Fire Chief, the Police Chief, the Superintendent of Parks and Recreation, and the Directors of Transportation, Planning and Development, Finance, and Neighborhoods, and of the Seattle-King County Health Department. (SMC 15.52.020)</p> <p>A representative of the Metropolitan Services Division of King County also serves as a non-voting member. (SMC 15.52.020)</p>	<p>The Special Events Committee’s voting membership is in compliance with the SMC. A representative of the Metropolitan Transit Services Division is also an active, non-voting member, consistent with RCW 15.52.020.</p>
CC-2	<p>In addition to the government representatives, City code requires that the Mayor appoint three citizens and one alternate, subject to confirmation by the City Council; an alternate may vote when the appointee is absent. One of the citizens shall have experience in organizing special events with attendance 10,000 people; another shall have experience organizing smaller events.</p> <p>The Mayor shall appoint the chair of the</p>	<p>Currently two citizen representative positions and one alternate position are vacant.</p> <p>The current citizen representative plays an important advocacy role for new permit applicants. However, it requires extensive time for committee membership activities. The City may want to determine whether it is realistic to expect citizens to make this considerable commitment to the City on a routine basis.</p> <p>Please see Finding 9 (on page 28) for further</p>

	Committee, who shall serve for a term of two years and may be reappointed. The incumbent chair shall hold over at the expiration of his or her term until a successor is appointed and qualifies. (SMC 15.52.020)	discussion and suggested recommendations.
CC-3	The Special Events Committee has a succession plan in place to ensure continuity of program efficiency and operations.	The Special Events Committee currently relies on the availability of one individual to coordinate the Special Event Permit process and chair the Special Events Committee meetings. That person is on annual contract, already retired from the City, and no back-up or succession plan exists for how to replace this individual if needed. The City's institutional memory plays an important role in the permit review process which currently resides solely with the Special Events Coordinator.  Please see Finding 5 (on page 22) for further discussion and suggested recommendations.
<b>Responsibilities/Activities of the Special Events Committee</b>		
CR-1	Defines when a Special Event Permit is required.	Definition is provided in the <i>Special Events Handbook</i> ; during Committee review of event applications, whether a Special Event Permit is required or not is frequently discussed, reviewed, and a decision made.
CR-2	The Committee coordinates with City departments and other government entities the nature and scope of government services necessary for events, advises the organizer of other permits that appear to be required and identifies contacts for those permits, and, if necessary, may propose change options if the event would interfere with construction or maintenance work, infringe upon the rights of abutting properties, or possibly disrupt safe circulation and traffic.	The Committee generally coordinates services with City departments and other government entities. Although the Fire Marshall's Office attends the Special Events Committee representing the Fire Department, the Fire Operations Division should also send a representative to coordinate fire operation services for large events (e.g., festivals, Seafair, the 4 <sup>th</sup> of July, etc.).
CR-3	Identifies the appropriate fee or, if applicable, applies an exemption or exclusion.	At the close of event presentations after Committee review, the fee is calculated and stated based on a published fee schedule that is annually updated. Fee exemptions apply to event activities that are constitutionally protected under applicable law.
CR-4	Promptly processes and does not charge fees for constitutionally-protected events (for example, political and religious activities protected under the First and Fourteenth Amendments to the United States Constitution, or Article I, Sections 3, 4, 5, or 11 of the Washington Constitution).	Committee complies with this requirement. Our 2006 sample analysis indicated that zero percent (0%) of applications for constitutionally-protected events apply for a permit in advance of the recommended 90 days of the event date, often resulting in a last-minute scramble to process the permit application.
CR-5	Promptly processes applications for constitutionally-protected events in a manner that respects the liberties of applicants and the public.	Interviews with Committee members indicate that Committee goes out of its way to accommodate constitutionally-protected events. Committee members indicate that sub-committees are often formed to work out the terms and conditions for the

		permits, which can be challenging because of the short lead times for most constitutionally-protected events, One Web survey comment expressed however, that “political events often do not have the long lead time, and the special events ordinance makes no allowance for the political realities – furthermore it is up to the whim of the special events chair, and the SPD if/when a permit will move forward or get intentionally bogged down and make planning impossible.”
<b>Administrative Provisions</b>		
AP-1	The Committee adopts rules for its own procedures. (15.52.030 H)	The <i>Special Events Handbook</i> also serves as the policy and procedures guide for the Special Events Committee.
AP-2	The Committee establishes subcommittees for assignments. (15.52.030 H)	Subcommittees are routinely formed to meet with applicants to review complex or specific issues related to specific events apart from the Committee at large, with only the applicable City and agency representatives present  For example, at the August 2007 Committee meeting, a subcommittee was formed to develop policies regarding marathons to address safety issues (e.g. whether to provide services when roads are icy) related to providing Seattle Police Department Motor Patrol resources for outside sporting activities.
AP-3	The Committee establishes and periodically updates the base fee schedule for special events.	Special Event Permit Fee Schedule is published annually and is included in the information packet sent to prospective applicants. The base fee was established before 1992 and has been updated annually every year since per the requirements established in City Ordinance 115982.
AP-4	The chair maintains committee records, arranges meeting times and places, sends statements, and issues permits on behalf of the Committee. (15.52.020 C)	The Committee documents and maintains records of Committee meetings and planned events. However, a post-event debriefing checklist could be developed to fully capture data on past events for use in future planning.
<b>Permit Application Processing</b>		
PP-1	To help City managers plan for and assign police, fire, and other department personnel, the Committee encourages permit applicants to submit their applications at least three (3) months before the scheduled event. (15.52.060)	The majority of Web survey respondents reported that the permit applications were submitted 90 days or more before the planned event.  Our analysis confirmed that the Special Events Office personnel, handbook, and permit application form provide encouragement (and repeated reminders) to permit applicants to comply with the three-month application deadline. Our analysis of the 2006 permits also indicated that the average submission date was 91 days before the scheduled event. The averages for submission of sporting events and day events were 147 and 102 days, respectively. The 14 day average for valet parking events did not comply with code requirements, but was adequate for event planning purposes.

		However, the average for submission of Constitutionally-Protected event applications was only 38 days due to more spontaneous organization of new events.
PP-2	The Committee processes event applications within 60 days of the date of the application, if practicable. (15.52.060)	<p>Ninety-three percent (93%) of the permit applicants responding to our Web survey indicated that Special Event Permit applications received a timely review. Seven percent (7%) indicated “no”. (Web survey Question #15)</p> <p>Our analysis of the 2006 permits indicated that the Special Events Committee reviewed applications within an average of 39 days of the receipt date. The permit application review period ranged between 1 one day and 180 days of the application receipt date. The average review period for larger, more complex events and sporting events exceeded the statutory deadline; however, no event was delayed due to the longer application review period.</p>
PP-3	<p>The Committee denies applications when appropriate based on the criteria as follows:</p> <ol style="list-style-type: none"> <li>1. The applicant supplies false or misleading information; the applicant fails to complete the application or to supply other required information or documents; or the applicant declares or shows an unwillingness or inability to comply with reasonable terms or conditions contained in the proposed permit. (15.52.060 B)</li> </ol>	<p>During 2002-2006, the Special Events Committee denied four event applications (two for unspecified reasons, one for insufficient insurance, and one for lack of promoter signoff).</p> <p>However, interviews with Committee members indicated that permits are not denied to repeat applicants who have provided misleading information in past applications or have not complied with permit terms and conditions in the past.</p>
PP-4	<ol style="list-style-type: none"> <li>2. The proposed event is proximate to another previously permitted or previously scheduled exempt event, so that the combined impacts and required public services exceed that the City, after reasonable efforts have been made to accommodate both events, can reasonably provide; or the proposed event would interfere with construction or maintenance work in the immediate vicinity, or unreasonably infringe upon the rights of abutting properties. (15.52.060 B)</li> <li>3. The proposed event would unreasonably disrupt the orderly or safe circulation of traffic as would present an unreasonable risk of injury or damage to the public. (15.52.060B)</li> </ol>	<p>Efforts are being made to negotiate event times and locations that mitigate conflicts with other scheduled events and use less City resources. On the other hand, efforts to encourage the use of parks for runs and walks have not been as successful. These groups want to have their events in the streets.</p> <p>Police Traffic and Motor Divisions indicate they are not allowed to say NO due to lack of resources; they indicate that inability to adequately staff events because there are not enough resources is repeatedly overridden; that there is increase in need for overtime and that personnel are highly stressed; cannot be everywhere – there’s a limit; have to call in other support because not enough personnel available.</p> <p>The City provides a very favorable environment for obtaining citywide Special Event Permits which often challenges City resources. Please see Finding 3 (on page 19) for further discussion and suggested recommendations.</p>
PP-5	The Special Events Committee may cancel	Interviews with Committee members indicated that

	<p>or revoke a permit already issued upon written notice to the applicant stating the grounds for revocation if:</p> <ol style="list-style-type: none"> <li>1. The applicant, in the information supplied, has made misstatement of a material fact; the applicant has failed to fulfill a term or condition of the permit in a timely manner; or the check submitted by an applicant in payment of the fee for a permit has been dishonored. (15.52.060 C)</li> </ol>	<p>Special Event Permits are not revoked during the event even though City staff and other officials sometimes found that not all the required permits and conditions set forth in the Special Event Permit were obtained or met.</p>
PP-6	<ol style="list-style-type: none"> <li>2. An emergency or supervening occurrence requires the cancellation or termination of the event in order to protect the public health or safety. (15.52.060 C)</li> </ol>	<p>The Special Events Coordinator related that years ago, a Special Event Permit for Occidental Park for Fat Tuesday was revoked before the event at the request of the Police Chief/Mayor. This was the year that the Fat Tuesday incidents in the street occurred and the permit was for Fat Tuesday and was revoked.</p>
PP-7	<p>An applicant may request an administrative review of a Special Events Committee denial of a Special Event Permit application, or conditions placed upon a permit that the applicant alleges are unconstitutional or will prevent the applicant from holding the proposed event. (15.52.060 D)</p>	<p>No administrative review cases in 2006. Prior administrative review cases occurred in 2001 and 2002. Both involved event applications that were denied because of conflict with a previously-scheduled event in the same location. In the 2001 case, the event was re-located to a different area of the park; in the 2002 case, the event was re-located to a different park.</p>
PP-9	<p>The Special Events Office collects the full amount of the base fee upon issuance of the permit and prior to the event date.</p>	<p>Our random sample analysis of 59 events in 2006 indicated the fee for the Special Event Permit for all events was collected. However,</p> <ul style="list-style-type: none"> <li>▪ For all 4 event categories, permit fees were received from 73% of applicants prior to the issuance of the Special Event Permit</li> <li>▪ For Constitutionally-Protected Events: N/A</li> <li>▪ For Parade and Day Events: 89%</li> <li>▪ For Sporting Events: 50%</li> <li>▪ For Valet Parking Events: 14%</li> </ul>
PP-10	<p>The Special Events Office expeditiously transfers fee payments to the Parks Department Accounting Division for deposit.</p>	<p>Our random sample analysis of 59 events in 2006 indicated:</p> <ul style="list-style-type: none"> <li>▪ For all 4 event categories, the average number of days between the applicant's check date and the transfer by the Special Events Office to Parks Accounting was 3.68 days.</li> </ul>
PP-11	<p>The Special Events Office ensures that the City receives certification/proof of insurance from event sponsors prior to the issuance of the Special Event Permit.</p>	<p>Our random sample analysis of 59 events in 2006 indicated:</p> <ul style="list-style-type: none"> <li>▪ For all 4 event categories, insurance certification was received from 89% of applicants prior to the issuance of the Special Event Permit</li> <li>▪ For Constitutionally-Protected events: N/A</li> <li>▪ For Parade and Day Events: 89%</li> <li>▪ For Sporting Events: 83%</li> <li>▪ For Valet Parking Events: 100%</li> </ul> <p>Insurance certification was recorded for 58 of the 59 events before the day of the event.</p> <p>The lack of certification for this one event was due</p>

		to miscommunication between the City’s Risk Management Office and the Special Events Coordinator regarding whether the event was an exempt event and did not require insurance.
<b>Process Clarity and Process Effectiveness to Stakeholders (City Departments, Permit Applicants, Public-at-Large)</b>		
PCPE-1	Information about applying for Special Event Permits is easy to find and understand.	<p>First-time applicants expressed frustration with finding, obtaining, and understanding permit information. The City’s Web site does not have a Web page for Special Events, and a search for Special Event Permits leads to permit requirements for other City departments including Fire, SDOT, Public Health – Seattle &amp; King County, and Parks. Included in the details for these other department permits is outdated information about Special Event Permits and a contact name and phone number for the Special Events Coordinator. (Once the Coordinator is contacted, a current Special Event Permit information packet including an application is sent by mail.)</p> <p>While 72% of Web survey respondents indicated that access to information was “very easy” to “somewhat easy to find and understand”, 15% indicated it was “somewhat difficult” to “very difficult to find and understand”. Fourteen percent (14%) indicated “neutral”. (Web survey Question 9.)</p> <p>As the Web survey respondents have some experience with the permitting process, these responses indicate that accessing permit and application information even for experienced applicants can be challenging.</p> <p>In addition, interested citizens attempting to find information about how to contact the Special Events Office to complain about an event expressed frustration as well. The citizen indicated she called the Mayor’s Office, other City departments, and Seafair, and said, “no one mentioned calling or referred me to the Special Events Office”.</p>
PCPE-2	The criteria for determining whether an event requires a Special Event Permit are established, clear, and available to potential applicants.	<p>The definition for “special event” is confusing for uninitiated applicants and the public. There are at least three other City offices using the term – Parks Scheduling Office, Fire, and SDOT, with no direct link to the citywide Special Events Office.</p> <p>Once telephone contact is made with the Special Events Office, the applicant receives a permit application packet including the <i>Special Events Handbook</i>, which clearly defines when a Special Event Permit is required. The <i>Special Events Handbook</i>, developed by the Special Events Office, provides a complete and useful resource for permit applicants. The handbook contains a copy of</p>

		relevant City ordinances, as well as current information regarding special permit requirements and conditions, fees, requirements for other permits and fees, and other relevant information.
PCPE-3	Instructions for completing the Special Event Permit application are clear and easy to understand.	<p>Forty-four percent (44%) of the Web survey respondents indicated that the instructions to complete the permit application were “very clear and easy to understand.”</p> <p>Forty-one percent (41%) indicated the instructions were “somewhat clear and easy to understand”; 10% indicated “very unclear and difficult to understand” to “somewhat unclear and difficult to understand”; and 5% indicated “neutral”. Over half (51%), indicated there is room for improvement. (Web survey Question 10.)</p> <p>We observed Special Event Permit application reviews at five monthly Committee meetings. In several cases applications were incomplete or inaccurate and the applicants were asked to come back or a Subcommittee was formed to further review the application.</p>
PCPE-4	Insurance requirements for Special Event Permits are clear and easy to understand.	<p>Forty-two percent (42%) of the Web survey respondents indicated that the Special Event Permit insurance requirements were “very clear and easy to understand”; 36% indicated “somewhat clear and easy to understand”; 14% indicated “very unclear” to “somewhat unclear and difficult to understand”; and 8% indicated “neutral”. (Web survey Question 11.) Fifty percent (50%) indicated that there is room for improvement.</p> <p>We found that proof of insurance is often provided late to the City’s Risk Management Office, resulting in a last minute scramble by City officials to certify the insurance prior to issuing the permit.</p>
PCPE-5	City staff are easy to contact regarding special event questions.	<p>Ninety percent (90%) percent of Web survey respondents were very satisfied or satisfied with how easy it was to contact City staff for answers to Special Event Permit questions; 3% were “dissatisfied”; and 7% were “neutral”. (Web survey Question 12A.)</p> <p>Much of this contact occurs by phone. Web survey respondents did comment, however, that they would like to see more information about Special Event Permits and other department/agency permits on a Web page, and broader use of email to query department/agency contacts and receive answers about questions related to application and permit requirements.</p>
PCPE-6	City staff respond to special event questions in a timely manner.	Eighty-eight percent (88%) percent of Web survey respondents were “very satisfied” or “satisfied” with

		the timeliness of City staff responses; 5% were “dissatisfied” or “very dissatisfied”; 7% were “neutral”. (Web survey Question 12B.) One respondent commented that “members of the Committee do not call back and it is very difficult to find out who to speak to prior to the [Committee] meetings.”
PCPE-7	City staff respond professionally to information requests regarding special events.	Eighty-six percent (86%) percent of Web survey respondents were “very satisfied” or “satisfied” with the professionalism of City staff, and those who provided written comments were highly complimentary of the responsiveness and professionalism of Special Events Office staff, particularly the Special Events Coordinator. Seven percent (7%) were “dissatisfied” or “very dissatisfied”; 7% were “neutral”. (Web survey Question 12C.)
PCPE-8	Conditions for approval of permit applications were identified and communicated well in advance of the event so appropriate action could be taken. Individual City department representatives were available to work with applicants to ensure permit conditions were met.	Fifty-four percent (54%) of Web survey respondents indicated the conditions were “very clearly identified and communicated”, 27% indicated “somewhat clearly identified and communicated”; 10% indicated “somewhat poorly” to “very poorly identified and communicated”; and 8% indicated “neutral”. (Web survey Question 19A.)  We observed that the conditions for the permit are often given informally and verbally at the conclusion of the committee review meeting, but that the official permit with specific, written conditions is not provided to the applicant until weeks or days before the event. A small number of Web survey respondents indicated that not getting the permit until shortly before the event creates some problems. One respondent indicated that holding the permit until just before the event makes “planning very sketchy at best”.
PCPE-9	At Committee review meetings, Committee members give fair consideration to applicant input in their decision making process.	Sixty-nine percent (69%) of Web survey respondents indicated they “strongly agree” or “somewhat agree” that their input to the Committee (or Subcommittee) was given a fair hearing and considered in the final decision; 9% “strongly disagreed”; 22% were “neutral”. (Web survey Question 18.)  We observed that applicants are given the opportunity to present their event plan to the Committee. In some cases, there are conflicts with other events or resource constraints that applicants are made aware of by the Committee, and some applicants may feel that because adjustments were required by the Committee, their event did not receive “fair consideration” in the permit decision.
PCPE-	The presence of City department representatives at Committee meetings	Fifty-nine percent (59%) of Web survey respondents indicated they “strongly agree” or “somewhat agree”

10	helps applicants better understand City concerns and resource commitments needed for their events.	<p>that their input to the Committee (or Subcommittee) was given a fair hearing and considered in the final decision; 15% “somewhat “to “strongly disagreed”; 25% were “neutral”. (Web survey Question 17.)</p> <p>Web survey comments included the following:  “The Committee represents the best that the City government has to offer with regard to cooperation and support for individuals and organizations.”  “There were too many people in the meeting - it was a waste of tax payer money.”</p> <p>We observed that this was the first time many applicants made initial contact with City department and other agency representatives who provided information about additional required permits and conditions. For small and new events, it was indicated that the presence of the large Committee review with many department representatives was intimidating. However, this process provides a very efficient and convenient one-stop means for both the applicant and the City to coordinate City responsibilities relative to public safety and traffic with event plans.</p>
PCPE-11	City resources committed to special events were provided as agreed.	Sixty-six percent (66%) percent of Web survey respondents “strongly agreed” that City resources committed to their event were provided as agreed; 10% indicated “somewhat agree”; 4% indicated: “somewhat disagree” to “strongly disagree”; and 20% indicated “neutral”. (Web survey Question 21.)
PCPE-12	Neighborhoods and businesses are given advance notice of the event date, type, and duration.	<p>We observed Committee discussion of a few examples of complaints indicating the neighbors did not know about the event causing inconvenience.</p> <p>There is no formal process or procedure that ensures potentially affected neighborhoods and businesses receive sufficient advance notice and information about special events in their areas. The current application process relies on applicants to contact neighborhoods and businesses either directly or through DON Neighborhood Coordinators. However, Neighborhood Coordinators do not receive sufficient information about special events occurring in their areas with enough advance notice to be able to review and respond to neighborhood concerns. As a result, the current recommended level and method of neighborhood notification may not be sufficient.</p> <p>An informal survey of the Neighborhood Coordinators in the Department of Neighborhoods indicated that at least half of those who responded: 1) did not receive timely information about special events that are applying for a permit in their neighborhood; 2) did not have the opportunity to provide input during the Special Event Permit review and approval; and 3) the effort of special</p>

		event promoters to notify businesses and residents about the time, place, and description of special events is inadequate.
PCPE-13	The permit review and issuance process is efficient and timely.	Committee members indicated that the permit process is extremely efficient, thanks to the Special Events Coordinator. The Coordinator facilitates the Committee review meetings and is extremely effective in coordinating and processing the hundreds of applications, each with unique and often complex problems that need to be worked out. Committee member feedback indicated, however, that there are tradeoffs to this high level of efficiency. Comments included that the process may be at the expense of encouraging neighborhood input, and that a more careful review of applications may be sacrificed because Committee meetings are often rushed due to the limited time available to review many applications.

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## V. Findings and Recommendations

### **Finding 1**

#### **The City of Seattle Special Events Permit Program is Administered Efficiently and In Compliance with the City Code.**

The mission of the Special Event Permit Program is to provide a process to coordinate governmental services for events in parks or public places that may include police for crowd or traffic control; issue Special Event Permits for such events; determine appropriate terms and conditions for such permits; set the applicable fees or apply exemptions; and administer Seattle Municipal Code (SMC) 15.52 that sets forth the mandates and guidelines for special events.

We determined that the Special Events Office administers the Special Event Permit process in a manner that is consistent with its mission of ensuring that public health and safety are protected during major community events. The Special Events Office, in cooperation with the Special Events Committee established by Ordinance 115982, also performs each of the mandated responsibilities identified in the City Code. Based on the results of Special Events Permit Web survey and extensive interviews, we also concluded that the Special Event Permit application process works efficiently for permit applicants as well as for City department representatives who serve on the Special Events Committee that reviews and recommends approval or denial of permits.

During the Special Event Permit Program review, we also identified opportunities to enhance the permit application process. Examples of opportunities to enhance the permit application process include:

- 1) Establishing a dedicated Special Events Office Web site to improve applicant access to permit information and requirements, and to notify interested parties (permit applicants, affected communities, and the general public) of approved events, schedules, and routes;
- 2) Developing a voluntary new permit applicant orientation session that offers first-time applicants additional instruction and opportunity to ask questions prior to completing the formal permit application; and
- 3) Engaging in succession planning so that City special events personnel are appropriately trained and processes are well-documented to ensure a smooth transition in the event that key contract personnel retire.

### **Recommendation**

See the following findings which contain specific information on current Special Event Permit operations and processes as well as related recommendations on program enhancements.

## **Finding 2**

### **The City of Seattle Special Events Coordinator Provides Effective Leadership to Special Event Permit Applicants and the Special Events Committee.**

The Special Events Coordinator plays a critical role in facilitating the special events permitting process. The Coordinator is responsible for promoting good interface between the various agencies that provide separate permitting services to permit applicants; responding to applicant inquiries, questions, and special issues; issuing the Special Event Permit; invoicing and collecting Special Event Permit fees; and ensuring that the Special Events Program operates in compliance with City mandates.

In addition, the Special Events Coordinator embraces community celebrations while performing her job in a highly efficient manner. She has over 40 years of experience in event planning and is well respected by permit applicants and City departments, particularly for her effectiveness and responsiveness in organizing a large number of complex events involving diverse interest groups. She also serves as an important bridge to the Mayor's Office.

Special Events Committee members indicated that the Special Events Coordinator is highly effective and efficient in facilitating and processing Special Event Permits. The permit applicants who responded to the Web survey also consistently provided high marks for the Special Events Coordinator. The respondents were complimentary of the Special Events Coordinator's professionalism, responsiveness, and "delightful" attitude as well as her assistance in "making the [application process] very easy."

## **Finding 3**

### **City Policy Embraces Special Events by Providing a Favorable Permitting Environment and Public Resources For Events And Participants.**

The City has an unofficial "getting-to-yes" policy for citywide special events. This means that instead of denying a Special Event Permit, the Special Events Committee frequently negotiates permit terms and conditions with the applicants to achieve a workable compromise for all parties. Examples of negotiated terms and conditions include revised event dates, start times, locations, routes, and the level of City resources provided. This approach truly fosters a favorable permitting environment for applicants because it results in permitting many more citywide special events than would otherwise occur. During our attendance of several Special Events Committee meetings we observed several new special events getting permit approval even though one of the committee members had concerns about specifics in the event plan. In these cases the decision was made to allow the permit and "see how it works out". Some committee members we interviewed told us that this approach has resulted in challenges and problems for personnel assigned to such events.

The City also provides a favorable permitting environment for special events and participants through a moderate fee structure for Special Event Permits. Although permit

fees have increased by an annual average of three percent (3%) from 1992 to 2006, permit fees have not kept pace with the cost of City services and resources. As an example, the 2006 Seafair Hydroplane and Airshow paid \$160,729 (\$65,350 for the Special Event Permit and \$95,379<sup>10</sup> in estimated fees to other City departments and outside agencies) for its Special Event Permit and related fees, and the Torchlight Parade paid \$29,000 for its Special Event Permit. For Seafair, the cost incurred by just the Seattle Department of Transportation alone to set up and take down barricades in 2006 totaled \$85,000 and the cost for the Seattle Police Department Traffic Control for the Seafair Hydros and Torchlight Parade totaled slightly more than \$400,000 which together exceeded the Special Event Permit fees collected. In addition, other events such as marathons are charged permit fees equivalent to a small fraction of the amount of revenues generated during the events, and constitutionally-protected events are permitted free of charge. In addition to the base entry fees, a per person entry or access fees is charged for events requiring participant entry or access fees. Overall, the total Special Event Permit fees and other fees collected for the various event categories was consistently less than expenses incurred by the City.

The favorable nature of the City fee structure was confirmed during a 2003 City of Seattle Department of Finance study. The study found that special event permit fees charged by other jurisdictions of comparable size were higher than Seattle's fee schedule. In some cases, the other jurisdictions not only charged a permit fee for special events, but also required separate payments for the extra costs incurred for use of additional City services and resources (e.g., police overtime costs). Some of the other municipalities also charged fees to non-profit organizations that allowed cost recovery of city expenses.

Although the Department of Finance study recommended that the City move toward full recovery of event expenses, the Mayor's Office opposed fee increases for special events. The Mayor's opposition was based on analysis that indicated that the fee increases would have a negatively disproportional impact on the smaller special events sponsored by local neighborhood organizers.

In lieu of fee increases, the Mayor's Office requested the City departments and Special Events Committee work with the event organizers to find ways to reduce City services and resources dedicated for citywide special events. For example, relocating fun runs from city streets to city parks would reduce the cost of Police Department and Department of Transportation crowd and traffic control services. The Department of Finance's 2005 update of the 2003 study found that Police Department overtime expenses were reduced by 40 percent from 2003 to 2005 based on strategies to reduce deployment of officers (e.g., committee recommended changes to use alternate/shorter routes, use of sidewalks for marches, etc.).

Based on audit interviews, we also determined that the Department of Transportation is avoiding or reducing its overtime expenses for special events by varying the barricade setup and teardown times for certain events to coincide with regular work hours (not

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<sup>10</sup> Includes fees for Parks Use Permit and for other City department miscellaneous permits and licenses (e.g. Fire Marshal open flame, propane storage, DPD Tent structures, etc).

overtime), and by requiring new event organizers rather than city staff to provide the labor and materials for signage along roadways required for all new citywide special events. However, the Seattle Department of Transportation has adopted a policy of continuing to provide barricades set up and tear down at City expense for over 20 longstanding City special events. These “grandfathered” events include some of Seattle’s traditional and celebrated events including many Seafair events.

It should be noted that if the City wanted to further rebalance its special events policies toward one of fuller cost recovery and less subsidization of special events, it would be necessary to reconsider the current barricade benefits now provided by the Department of Transportation for a group of “grandfathered” events free of charge.

### **Recommendation**

The City should consider developing a vision, and overall City plan, which designates certain kinds of events and activities based on crowd expectations to be held in certain areas or venues in the City. (Same as Recommendation for Finding 10)

### **Suggestion**

The City may wish to consider eliminating or phasing out its policy of not charging “grandfathered” events for Department of Transportation related expenses in order to further reduce its special event expenses.

## **Finding 4**

### **The Special Events Committee Effectively Balances Community and Event Organizers Interests During Its Review and Approval of Special Event Permit Applications.**

The Special Events Committee is chaired by the Special Events Office Coordinator and is comprised of representatives from City of Seattle, King County and Washington State agencies. As noted earlier, the Special Events Committee’s roles and responsibilities are set forth in SMC 15.52. The Special Events Committee meets monthly to review permit applications, interview and exchange information with permit applicants about pending events, schedule special events, identify City resource requirements, and set permit conditions to mitigate any potential public health or safety risks related to the special event.

Based upon our observations of the Special Events Committee meetings, a series of individual interviews with committee representatives, and permit applicant input provided through the Special Events Permit Web survey, we concluded that the Special Events Committee:

- Works effectively as a team in executing assigned roles and responsibilities. For example, Committee members ensure that the general City rules and specialized conditions for each event are clearly communicated; related permit requirements and associated fees are fully disclosed; and contact information is provided in the event permit applicants require additional information or assistance.

- Demonstrates a high level of professionalism and experience in representing the City's and public's interests while offering constructive suggestions to permit applicants that can help save time and reduce costs.
- Assists event organizers and permit applicants in exploring the range of issues they might not envision related to community impacts, and helps identify alternatives (e.g., venue changes, date and time adjustments, plan restructure, etc.) if the proposed event has the potential to adversely impact public health and safety or overextend public services.

Despite the professionalism and openness of Committee members, we noted that some permit applicants were uncomfortable presenting event proposals to the full Committee, or confused about specific steps in the permit process. This was confirmed by the Special Events Web survey results and during interviews with Committee members. For example, the Citizen Representative to the Special Events Committee indicated that new permits applicants had the greatest difficulty understanding and navigating the permit process successfully. Those applicants often needed additional assistance not only with the permit application and Committee presentation, but also with structuring or framing actual events to meet City permit requirements. (Please see related discussion under Finding 11 on permit process advocacy.)

### **Recommendations**

The Special Events Office, in collaboration with the Special Events Committee, should consider developing a voluntary new permit applicant orientation session – presented annually or semi-annually – that offers first-time applicants additional instruction and opportunity to ask questions prior to completing the formal permit application.

### **Finding 5**

#### **Succession Planning is Needed to Ensure the Continued Success of the Special Event Permit Program**

The Special Events Coordinator is a unique, one-of-a-kind position in the Department of Parks and Recreation. The current incumbent has more than 40 years of experience in special events, and is well-respected for her extensive facilitation and organizational skills.

Currently, the Special Event Permit Program is in a vulnerable position because it largely depends on the Special Events Coordinator for its continued success. Given the large number of Special Event Permit applications and the citywide importance of many of these major events, City decision makers and managers recognize that succession planning is needed to ensure an adequate transition when the Special Events Coordinator retires.

In fact, the Parks Event Scheduling Office experienced an operations crisis during 2000, when a single individual handled the processing of Parks Use Permits for Special Events

for decades. His sudden departure from the City left a significant knowledge gap concerning parks events scheduling and associated operations.

Engaging in succession planning is essential so that City special events personnel are appropriately trained and processes are well-documented to ensure a smooth transition in the event that key contract personnel retire. Succession planning for the Special Events Coordinator was repeatedly identified during interviews as a significant concern for several Committee members and as a priority for the Mayor's Office. The Parks Department recognizes this vulnerability and is currently exploring opportunities to integrate both the citywide special events and the park use permit functions so that staffing and other resources can be better utilized. However, no action or substantive succession plans were in place during the audit review period.

### **Recommendations**

The Parks Department, in collaboration with the Mayor's Office, should develop and implement a succession plan for the Special Events Coordinator position. In addition, written policies and procedures for the Special Events Office and permit processes should be developed to provide guidance to incoming personnel, thereby ensuring the continued success of the citywide special events operations.

### **Finding 6**

#### **Permit Applicants Would Benefit from Direct Access to the Special Events Office and Improved Permit Process Information**

Direct access to special events personnel and to improved permit process information was an issue identified by a number of Special Events Committee Members during audit interviews and by permit applicants who responded to the Special Events Web survey. Many prospective permit applicants are unaware of the Special Events Office was established to coordinate the Special Event Permit process, and initially contact other City agencies such as the Seattle Fire Department and the Department of Transportation to obtain information about citywide Special Event Permits. Permit applicants are led to these other City agencies by the City search engine, which provides links to the agencies when applicants type in the key words "special events" or "special event permits". The City has not yet established a direct link for the Special Events Office.

The absence of a dedicated Special Events Office Web site and links to other City agencies creates confusion for applicants. One permit applicant described the confusion created when he mistakenly obtained and completed the application for a *park use permit for special events* rather than a *citywide Special Event Permit*. He discovered the Park Use Permit from the Parks Web site during his search for a citywide Special Event Permit. Confusion regarding outdated Special Event Permit information, including fee

schedules, also occurred because related information posted on other City agency Web sites was not consistently updated.<sup>11</sup>

In the written comments section of the Special Events Web survey, numerous permit applicants requested that the City post the Special Event Permit application on its Web site along with better information about the categories of Special Event Permits, when the various types of permits are required to schedule events, and clearer definition and delineation of potential requirements for other permits (e.g., temporary food service permits, special occasion liquor licenses, etc.) given the type of category of event planned. Permit applicants are currently unable to determine what permits are necessary for their event until they establish contact with the Special Events Coordinator, who ultimately mails (through the US Postal Service) an application packet that includes a comprehensive *Special Events Handbook*, permit application, and related documentation.

Direct Web access to the Special Events Office with the posting of information about permitted citywide special events would also be beneficial for local communities and businesses affected during the actual event. We observed during Special Events Committee meetings several instances where neighbors and businesses complained there was insufficient notification about events held in their area. Posting schedules online for approved special events prior to the event helps affected parties to prepared for increased traffic or potential disruptions.

### **Recommendations**

The Parks Department should develop and maintain a dedicated Web site for the Special Events Office. At a minimum, the Web site should provide online information from the current Special Events Handbook, including the definition of a special event, factors used to determine if a Special Event Permit is required, the permit application and process for obtaining a permit, and information about the Committee review process. In addition, such a Web site should identify and provide links to City departments and other agencies that may require permits and fees for the various categories of events.

The Special Events Office may also wish to consider the benefits of an online application process, and embedding links to other agencies that require event related permits or licenses. In addition, the Special Events Office should consider posting the scheduled dates for approved events, the type of event, and the estimated number of participants as a courtesy to affected communities.

In addition, other City departments and agencies, including the Department of Neighborhoods, could benefit from direct access to an InWeb or similar online site that posts permit application information as it is received by the Special Events Office. Currently, the Special Events Office faxes the applications as they are received, to eight City agencies and Metro. Approximately one week before the upcoming Committee meeting, the Special Events Office prepares a set of all permit applications to be

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<sup>11</sup> Another source of confusion is that the Fire Marshal's Office uses the term "special event permit" in conjunction with temporary assembly permits related to public assembly (e.g., large public gatherings including fairs, concerts, sporting events, and festivals).

reviewed at the meeting and sends the hard-copy sets to 15 City and outside agency/citizen representatives by interdepartmental mail or US Postal Service.

### **Suggestion**

The Special Events office may also wish to consider an InWeb site that posts permit application information as it is received by the Office. During interviews with the Department of Neighborhoods, we learned that DON Neighborhood Coordinators receive notice of citywide Special Event Permit applications only days before the Committee reviews the permit applications. Although DON is represented by a Committee representative, this short notice does not allow Neighborhood Coordinators to identify neighborhood concerns about the event applications and relay them to their Committee representative. An InWeb site (or similar online Web site) would facilitate the processing and reviewing of permit applications by different City departments and outside agencies, eliminate mail transit time, reduce questions related to poor fax copies, and conserve paper. Another recommendation is to insure that all Department of Neighborhood Coordinators are on the distribution list for the Monthly Special Events Calendar Updates which lists all citywide special events.

### **Finding 7**

#### **Special Events Committee Meeting Minutes Are Well-Developed and Serve as a Useful Reference for Future Events Planning. A Checklist Would Be Useful in Addressing and Documenting Post-Event Debriefings for Future Reference.**

The proceedings of the Special Events Committee are recorded in monthly meeting minutes. The meeting minutes generally document post-event debriefings, applicant presentations, and decisions. The content and quality of the meeting minutes are very detailed and well written. The minutes also serve as a point of reference in documenting the proceedings and decisions made as well as for planning similar events in the future. The monthly meeting minutes are in electronic and accessible format to Committee members and maintained by the administrative support staff for future reference.

Proceedings at Special Events Subcommittees, typically established for purposes of reviewing and negotiating terms and conditions for more complex special events, are not recorded. In addition, Committee meeting post-event debriefings are recorded by listing all the events discussed with a short notation as to whether or not issues surfaced, and if so, a short statement about the issues. The entire list of post-discussion events is printed in hard copy and filed with each event on the list.

Recordkeeping documents meeting discussions, processes, and decisions which can be critical in confirming decisions if a question arises. Recordkeeping also provides the institutional memory for strategically programming and scheduling future events. The Special Events Committee meeting post-event debriefings are also included in the meeting minutes. The level of detail on these debriefings varies widely from event to event. It might be more beneficial to develop and maintain a post-event debriefing checklist for systematically capturing lessons-learned relative to event occurrences – both

challenges and successes – such as certain conditions not adhered to by event organizers in the past or best practices that contributed to well-orchestrated events.

Complaint-handling for citywide special events also resulted in missed opportunities for Special Events Committee members to learn from past events and take constructive action for the future. Currently, some complaints are filed with the Department of Neighborhoods Citizens' Service Bureau, and some complaints are received by various City departments (e.g., Parks, SPD (911, non-emergency 911 and calls to Precincts), DPD and SDOT). These complaints may not always reach the Special Events Office. DPD and Police indicated that they maintain their own record of complaints related to citywide special events that come into their respective departments and refer to their records to plan for the next year's event. The Special Events Office does, however, maintain a record of complaints they receive for future reference.

### **Suggestion**

An event checklist form could document the range of items covered during the meeting, including events fees, which City and outside departments the applicant was told to contact, Committee/applicant decisions and agreements, and follow-up (i.e., whether the event went to subcommittee or the applicant was asked to come back for another review, etc.). This checklist could be filled out during the applicant's Committee review, signed by the Coordinator, with copies to the applicant and event file, as a record of what was covered during the Committee review. If not carbon copy, the form could be on laptop and printed out and emailed to everyone as documentation of what was covered at meetings. Post event debriefings and discussions could be captured in this checklist as well.

### **Finding 8**

#### **Flexible Guidelines and Deadlines Established in the City Code for Processing Permit Applications Create Challenges for City Agencies Responsible for Reviewing and Approving Permit Applications.**

Recognizing that special events are by definition, unique events, the Seattle Municipal Code establishes guidelines in SMC 15.52 to accommodate the diverse group of events. These include a "soft" application submittal deadline (event applicants are "encouraged" to submit at least three months before the scheduled event) and the Committee to process the application within 60 days, if practicable. This recognizes that some events, namely constitutionally-protected events for political and religious expression, are often organized and permit applications submitted on short-notice.

The Special Events Committee also has flexibility (because of the word "may" in 15.52.060) in denying permits, allowing it to review each event on a case by case basis depending on activities, location, time, resources available, etc. The "getting to yes" policy highly encourages the negotiation between event applicants and the City/other agencies to accommodate the event to occur. This is a good thing. However, it comes with costs.

As applicants are “encouraged” and not required to submit their permit applications three months before the scheduled event date, when there are applications which come in after the 90 days or last-minute applications, the Special Events Committee goes out of its way to process them. In our sample analysis, we found a range of 290 days to one day prior to the event for application submittal, with an average of 91 days prior to the event.

Last-minute application submittals or application revisions pose permit review and resource planning challenges, requiring the Special Events Coordinator to contact and obtain responses from applicable City departments on a rush basis, and the event added to the Committee review agenda or a subcommittee organized. If there are Traffic Management and Police plans required for “late” or last-minute event applications, SDOT and Police drop what they are doing to develop them. Constitutionally-protected “free speech/protest” events are consistently a problem from a planning standpoint, because the applications usually are submitted at the last minute. SPD indicated that they sometimes negotiate with event leaders about safety issues related to planning protest routes and decisions are made at the department level, but can be changed at the last minute. In addition, last minute application submissions or a late change in event plans 1) makes it difficult for Neighborhood Coordinators to assess the impact of special events on the neighborhood before the event occurs, and 2) increases the likelihood that citizens will not receive accurate or timely notification about the event.

Obtaining proof of insurance certification can also be a last-minute hang-up before the permit can be issued. Proof of insurance is often provided later than the advance 30-day submittal guideline to the City’s Risk Management Office, resulting in a last minute scramble by City officials to certify the insurance prior to issuing the permit. For example, proof of insurance certification was documented by Risk Management within two days of the event for 10 of the 59 sample events in 2006. And, although the Special Events Handbook and permit application provide clear instructions to applicants about insurance requirements and who the insurance policy should be sent to, we were told by Risk Management and Special Events Committee members that some events send the proof of insurance to the wrong location and/or the insurance policy does not include either the proper amount of insurance or coverage for the City. Correcting these errors requires the applicant go back to the insurer and contributes to delays—at the very last minute—to permit issuance.

As it is the City’s policy to foster an environment that encourages special events to happen, interviews with Committee members indicated there are no adverse consequences for applicants with a history of non-compliance. Several Special Events Committee members expressed frustration with the absence of enforcement of Special Event Permit conditions. Violations included non-payment of permit fees, and failure to comply with specified event times, designated routes, and fire permit requirements. In some cases, such as noise violations, DPD’s policy is to deny noise variance applications submitted the following year. In other cases, including fire permit violations, no penalties or sanctions were imposed for recurring violations, i.e., they have either not complied fully with permit conditions or have provided misleading information in the

past. These include such things as repeated non-compliance with clearance for required fire lanes at community fairs, or failure to obtain all required permits and licenses that the event was advised to obtain.

### **Recommendations**

The City's challenge is to find the proper balance between a process that is so flexible it creates chaos and so bureaucratic that it stifles creativity and enthusiasm for special events. City officials may want to revisit the current process to see if they are satisfied with the current balance.

Some City departments represented on the Special Events Committee indicated that additional rules and efforts may be needed to ensure that all City fees are paid in advance and that checks are cleared up front.

### **Finding 9**

#### **Citizen Advocacy Representatives to the Special Events Committee Have Been Unfilled for a Substantial Length of Time**

Three Special Events Committee citizen representative positions and an alternate position were created to serve as volunteer advocates to assist applicants in navigating the permit system. Two of the positions and the one alternate position have not been filled for several years. Although the advocate position is an important one, it requires substantial time from volunteers to attend the lengthy meetings and participate in extensive discussion about special event policy and coordination.

### **Recommendations**

The City may want to revisit the requirements for the citizen representatives to the Special Events Committee. The ongoing vacancies for citizen representative positions may raise the question of whether it is realistic to expect citizens to donate the time to serve on the Committee.

### **Finding 10**

#### **Neighborhoods and Businesses May Not Be Receiving Sufficient Advance Notice or Due Consideration Relative to Impacts of Major Special Events.**

Several Special Events Committee members suggested that due consideration is not consistently extended to neighborhoods and businesses for major citywide special events. For example, fun runs scheduled on Sunday mornings in the downtown area or other neighborhoods impact churches.

Special Event Permit applicants are also required to contact neighborhoods and businesses either directly or through DON Neighborhood Coordinators.<sup>12</sup> During the

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<sup>12</sup> The Special Events Handbook states that DON requires applicants to contact their appropriate Neighborhood Service Center (NSC) about the date of the event, with a wide range of options to meet notification requirements for large and small (<500 in attendance) events. The range of notice options

permit application review by the Special Events Committee, representatives from City departments such as Police and Transportation who are knowledgeable about certain businesses or institutions that may be directly impacted by an event, may require the applicant to obtain documentation that the neighbors and/or businesses have been notified and have no issues with the event. We also learned from interviews with the Department of Neighborhoods that although DON Neighborhood Coordinators may be contacted regarding an upcoming citywide special event, it is difficult to assess the impact of special events with the information provided on the application. This activity is not their top priority.

### **Recommendations**

Rather than approving events on a case-by case, or tradition-basis year after year, one suggested recommendation is for the City to develop a vision, an overall City plan, which designates certain kinds of events and activities based on crowd expectations to be held in certain areas or venues in the City. Another suggested recommendation is to conduct a survey of City neighborhoods and businesses to identify impacts and potential mitigation efforts. Another recommendation is to ensure that all Department of Neighborhood Coordinators are on the distribution list for the Monthly Special Events Calendar Updates which lists all citywide special events.

### **Finding 11**

#### **Advocacy and Support Services Resources for New Special Event Permit Applicants Would Be Beneficial.**

Although the Special Events Committee is professional and helpful, the permits process can be imposing, particularly from a new permit applicants' perspective. New permit applicants are required to make a presentation to the full Committee describing the planned event and the expected number of participants. Following the presentation, Committee members from Police, Fire, Public Health, Transportation, Risk Management, and other City, County and State agencies offer applicants input on their proposals and inform them of permit requirements. Applicants are expected to deal simultaneously with security, finance, health, insurance, and other issues. The permit application alone is a thick and heavy document that contributes to a feeling of intimidation that is experienced by some applicants.

The Special Events Committee structure provides an opportunity for applicants to meet, all at one time, the many department and agency representatives that will be responsible for reviewing their permit applications. However, the cumbersome and layered application process can work against those who are attempting to organize a community celebration—from a block party to a major event. Inexperienced applicants in particular seem to have a difficult time dealing with the application process effectively, but even

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includes contacting affected community, business groups, and residences directly to announcements in neighborhood/citywide newspapers or media such as TV and radio. The handbook states: "The Special Events Committee suggests at least 2 ads (any size) or announcements in neighborhood/citywide newspapers."

experienced fun run and triathlons promoters have trouble navigating the process. One suggestion offered by the citizen advocate representative to the Special Events Committee was to fill the vacant citizen advisory positions and for the Special Events Committee and to explore alternative ways to refresh, better define, and fulfill advocacy support for new applicants.

Some of the “bureaucracy” associated with the permit process could also be reduced by making it easier for applicants to talk to City representatives on a one-on-one basis. City agencies and seasoned event organizers could potentially offer insight and assistance from an applicant perspective. For example, several Seattle Center and SDOT staff were identified as excellent resources in helping applicants frame events and develop programming that worked well for both the event groups and the community. Experienced organizers from One Reel, International Festivals and Events, Capitol Hill Music Festival, and Seafair were also identified as resources, who could offer prospective applicants suggestions in successfully working with the Special Events Committee and navigating the application process.

Scheduling small special events workshops was also identified as a potentially effective method for orienting new applicants to the permit application process. This would allow first-time applicants better access to a pool of event planners that could help them work effectively with communities in organizing events. For example, a Seafair internship program could serve a dual purpose of training new organizers while offering more assistance to the City in planning major events such as parades and hydro races.

### **Recommendations**

As discussed in the recommendation for Finding 4, we recommend that the Special Events Office, in collaboration with the Special Events Committee, develop a voluntary new permit applicant orientation session that offers first-time applicants additional instruction and the opportunity to ask questions prior to completing the formal permit application.

## **APPENDIX I DEPARTMENT RESPONSE**

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We received informal comments on the draft report from the Parks Department and the Special Events Office, Finance, SPD and Neighborhoods. In general, the departments agreed with the findings, conclusions, suggestions and recommendations included in the draft report. Each of the departments also identified recommended changes or additional information they thought would improve the accuracy of the report. We made changes and added information to the report where we thought there was merit and incorporated these changes into the report's suggestions and recommendations.

The official Department of Parks and Recreation response summarizes and addresses most of the comments we received from other departments. Below is the full text of that response.

### **Special Events Permitting Process Audit Department of Parks and Recreation (DPR) Response November 21, 2007**

The DPR would like to thank the Office of City Auditor for performing this thorough, detailed and positive Special Events Audit. DPR is in agreement with most of the findings and recommendations presented in this audit, but some comments are detailed below.

#### **Finding 1**

DPR In agreement

#### **Finding 2**

DPR In agreement

#### **Finding/Recommendation 3**

DPR recommends omitting the suggestion that an overall City plan should be adopted to identify specific and limited venues for special events. Special events planned for Seattle are both public and private, culturally and ethnically diverse and are well-distributed throughout the city with little or no negative public response in the majority of instances. Limiting special events venues would deprive event promoters of creativity, over stimulate targeted neighborhoods, while depriving other neighborhoods and potentially limit private event requests that are currently well served.

DPR agrees that SDOT fees waived for “grandfathered” events should be phased out slowly.

#### **Finding/Recommendation 4**

DPR does not believe that a voluntary new permit orientation would be effective. Such an orientation would have to be offered frequently (probably monthly) and would require staff resources currently not available. DPR also feels that this opportunity would capture a limited minority number of potential applicants, less than 20-30%. Permit process guidelines would be more effectively presented on a well-designed website with an FAQ section. DPR believes that the biggest hurdle to getting applicants to the SEC process is awareness of the process and requirements, not a lack of familiarity or training. Most applicants go through the process one-time and repeat applicants are comfortable with the process initially or after one presentation to the SEC. Based on historical experience with first time applicants, DPR believes that an orientation session would more likely be viewed as a session during which advice could be sought on the planning of potential events, rather than the SEC process to navigate.

#### **Finding/Recommendation 5**

DPR will establish a succession plan possibly to be included in the DPR Strategic Business Plan currently under development. In the interim, the Manager of Seattle Parks Event Management Unit is involved in the SEC and shadowing the SEC Chair/Coordinator to learn the Committee’s processes. The budget implications and any new position authority needed to implement a succession plan will be considered as part of the 2009/2010 budget development.

#### **Finding/Recommendation 6**

DPR fully supports City funding of a dedicated website for the Special Events office. The website should be interactive and completely electronic, backed by a database system that can effectively collect application and other data from the user via the website. (As opposed to current Parks websites .pdf versions of applications that still require printing and then mailing or faxing for submission.)

A Special Events website could reside within the DPR main website or be it’s own independent site, but should be directly reachable upon entering key words into a search engine. The SE website should also be a link included on all other City department’s websites. **Example:** A user researching street use permits on the SDOT website should see text stating that anyone interested in permitting city streets and sidewalks etc. should also research the City’s SE website and a web link should directly take them there. This system should be reciprocal as well, the SE website should contain text explaining that other City departments permits/resources may be required in addition to the Special Events permit and have links referring users to all potential City department websites permit areas.

The SE website should also contain a database supported calendar system so that all users had access to all events that had submitted an application for a permit. This database should allow recently added events to be marked “NEW” for a 15 or 30 day period after being entered onto the calendar.

DPR believes that initial access to a website may increase workload rather than decrease it due to the volume of calls and questions that will increase once this website creates greater citizen awareness. Call volume should be monitored carefully during this website launch phase the City may need to commit resources to temporarily increasing staff as public awareness is increased.

DPR also supports the creation of a Special Events InWeb site to facilitate communication and the timely sharing of information among city departments.

### **Finding/Suggestion 7**

DPR In agreement

DPR will work with the SEC Coordinator to develop this checklist, which should also include a final invoice of SEC fees. This is the type of information that an InWeb would facilitate.

### **Finding/Recommendation 8**

DPR is aware of the need to manage the permit review system so as not to create chaos nor stifle creativity. Lack of public awareness contributes to missed deadlines and late applications, which are 100 % accommodated because of the flexibility of the SEC. A website will improve public awareness.

Events are by nature fluid and change constantly and dramatically in the planning process, resulting in ever-changing support needs from police, fire and other City departments. An event presented in January with a July execution date may change significantly during the planning process and need to be re-presented for all City departments to be aware of changes, this is expected and not chaotic. SEC allows for this and also understands that review too early in the planning process of events may be premature. SEC is constantly sought as an event planning advice resource, which it is not.

DPR agrees that deadlines could be better enforced, but this would require legislating fees or fines to events as penalties for missed deadlines and would have to give the SEC authority to waive these penalties for some late applicants that were unaware of the process. This in itself may cause additional problems. Event permits could be withheld for non-payment of fees in a timely manner, but this also will cause additional problems.

Proof of insurance provided in a timely manner is also an obstacle to permit issuance for many applications. DPR supports better enforcement of this process as well, but feels that it's difficult to determine in many instances the cause of this obstacle. In many cases,

SEC is in receipt of sufficient insurance coverage that Risk Management has no record of receiving. Applicants are often advised to provide insurance proof to Risk Management multi times. DPR recognizes the need to work with Risk Management to clarify the procedure Risk Management uses to process and record receipt of proof of insurance.

**Finding/Recommendation 9**

DPR agrees that citizen advocacy is an important role in the SEC process and also agrees that it may not be realistic to expect citizens to donate their time for this. DPR suggests revising these roles into an Advisory Committee made up of Mayoral appointments (much like the Seattle Center Advisory Committee) that come with prestige in lieu of reimbursement. An Advisory Committee made up of 10-12 members would allow the members to attend as many or as few meetings as they could commit to but likely result in one or two members always in attendance.

**Finding/Recommendation 10**

Same as response to recommendation for Finding 3.

DON receives as much notice as other City departments and may need to make Special Events a higher priority within its department to insure that neighborhoods needs are met. Creation of a calendar on the proposed website may improve notification for timely events, but not for events that apply late.

**Finding/Recommendation 11**

Same as response to recommendation for Finding 4.