



## *City of Caribou, Maine*

*Municipal Building  
25 High Street  
Caribou, ME 04736  
Telephone (207) 493-3324  
Fax (207) 498-3954*

### **AGENDA Caribou Planning Board Regular Meeting Thursday October 12, 2023, at 6:00 p.m.**

The meeting will be broadcast on Cable Channel 1301 and the City's YouTube Channel.  
Public Comments submitted prior to the meeting no later than 4:00 pm on Thursday, September 7, 2023, will be read during the meeting. Send comments to City Manager Penny Thompson at [pthompson@cariboumaine.org](mailto:pthompson@cariboumaine.org).

I.	Call Meeting to Order, Determine Quorum, disclosure of conflicts of interest	<u>Pages</u>
II.	Public Hearings            Site design review – Kip Griffin 960 Access Highway	002-098
III.	Approval of minutes	
	a.        Review and approval of September 7, 2023, Planning Board Meeting Minutes	099-100
IV.	City Council Liaison Updates	
V.	New Business	
	a.        Community Conversation on Vision & Mission, 10.26.2023 Comp Plan	101
	b.        Exchange ideas to boost housing in Caribou	102
VI.	Old Business	
	a.        LD 2003 / LD 1706 update	103-123
	b.        Update on grant funded projects	124-125
	c.        Blight	
VII.	Staff Report	126-128
VIII.	Adjournment	



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### **Caribou Planning Board Meeting Minutes Thursday, September 7, 2023 @ 6:00 pm City Council Chambers**

**Members Present:** Steve Wentworth, Frank McElwain, James Belanger, Eric Hitchcock, Amanda Jandreau, Justin Staples, David Corriveau, Dan Bagley, Council Liaison, Penny Thompson, Staff

**Others in Attendance:** Kip Griffin, Karen Gorman

#### **I. Call Meeting to Order, Determine Quorum, disclosure of conflicts of interest**

Chairperson Amanda Jandreau called the meeting to order at 6:02 pm, all were present.  
No conflicts of interest.

#### **II. Public Hearings**

None.

#### **III. Approval of minutes**

Minutes of August 3, 2023 were reviewed and approved.

Motion by David Corriveau to approve minutes, seconded by Frank McElwain.

##### **Roll Call Vote:**

Steve Wentworth – Yes; Frank McElwain – Yes; James Belanger – Yes; Eric Hitchcock – Yes;  
Justin Staples – Yes; David Corriveau – Yes; Amanda Jandreau – Yes.

. Passed by unanimous vote.

#### **IV. Council Liaison Update**

- Council liaison Dan Bagley, discussed a Land Bank.
  - Working on a development plan – how to follow the whole process through.
  - Need to keep an eye on the tax acquired property new guidance.
  - CEGC would be a good advisory group.
- Discussion on tax acquired property

#### **V. New Business**

- a. Site design review – Kip Griffin 960 Access Highway
  - discussion with Kip Griffin about his business operation
  - could send to MMA Legal – what conditions
  - 1 dismantled car – max – parts, drained fluids
  - - Action Item – From MMA Legal – can we waive the 300' requirement

Motion by Eric Hitchcock to have a public hearing, seconded by David Corriveau.

##### **Roll Call Vote:**

Steve Wentworth – Yes; Frank McElwain – Yes; James Belanger – Yes; Eric Hitchcock – Yes;  
Justin Staples – Yes; David Corriveau – Yes; Amanda Jandreau – Yes.

. Passed by unanimous vote.

- b. Looking ahead to projects in the pipeline:
  - Police station
  - Recycler permit

**VI. Old Business**

- a. Blight – research from last meeting. It was noted to use the Property Maintenance Code; Vacant Building Code; Ordinances; and Blight Tool Kit, etc. The Board agreed they would like to have a dangerous building action taken for the Sweden Street property.
- b. Comprehensive Plan – August 31 workshop (Economy), September 28 (Public Facilities)
- c. Update on grant funded projects -workgroups, public input, and “Big Picture” initiative name.
- d. PL 2021, ch. 672 (LD2003) and PL 2023, ch. 192 (LD 1706)

**VII. Staff Report – by Penny Thompson, City Manager**

- a. Karen Gorman thanked the Planning Board members
- b. Comprehensive Plan – using Social Media
- c. Talked about CEO position
- d. Loring updates – not in talks with LDA coverage
- e. Monthly permit report

**VIII. Next Meeting**

- a. October 12, 2023, at 6:00 pm at the Caribou City Council Chambers
- b. Dave Corriveau asked to add to the next agenda - exchange ideas on boosting housing in Caribou

**IX. Adjournment**

Motion by David Corriveau to adjourn, seconded by Frank McElwain

**Roll Call Vote:**

Steve Wentworth –Yes; Frank McElwain - Yes; James Belanger – Yes; Eric Hitchcock – Yes;  
Justin Staples – Yes; David Corriveau – Yes; Amanda Jandreau – Yes.

. Passed by unanimous vote.

Meeting Adjourned 7:48 pm.

Respectfully Submitted,

James Belanger  
Planning Board Secretary

JRB/JK

**CARIBOU ADMINISTRATION  
25 HIGH STREET  
CARIBOU, ME. 04736**



**MEMO**

**To: Planning Board Members**  
**From: Penny Thompson, City Manager**  
**Date: October 12, 2023**  
**Re: Community Conversation on Vision and Mission for the 2024-2034 Comp Plan**

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Tonight, we are going to hear from Catherine Ingraham from CEI Consultants who will be our facilitator for our Community Conversation on Vision and Mission for the 2024 – 2034 Comprehensive Plan on October 26, 2023.

Catherine (Cat) Ingraham is a resident of Perham. She has been working in community planning and development for about ten years. She started in municipal planning for Androscoggin County and moved into non-profit community development work in 2016. She has been working with Community Heart & Soul in her current capacity since 2020 in several towns/cities across Maine and one in Massachusetts. Cat says she is excited to work with Caribou.

The logistics are October 26, 2023, 6:00 p.m. - 7:30 p.m., at the Caribou Wellness & Recreation Center. All are welcome and encouraged to attend this community visioning workshop and update on the Comprehensive Plan. Light refreshments and childcare will be provided.

Catherine will take us through her vision for how this session will work and what we can do to help get feedback from Caribou citizens.

For those who cannot attend, our website wonders have developed a website which will feature a form that will be active after the event. We also hope to be able to post updates and other feedback opportunities here.

<https://www.cariboumaine.org/caribou2034/>

**CARIBOU ADMINISTRATION  
25 HIGH STREET  
CARIBOU, ME. 04736**



**MEMO**

**To: Planning Board Members**  
**From: Penny Thompson, City Manager**  
**Date: October 12, 2023**  
**Re: Exchange ideas on boosting housing in Caribou**

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Planning Board member David Corriveau asked for an agenda item to have an exchange of ideas on boosting housing in Caribou.

**CARIBOU ADMINISTRATION  
25 HIGH STREET  
CARIBOU, ME. 04736**



**MEMO**

**To: Planning Board Members**  
**From: Penny Thompson, City Manager**  
**Date: October 12, 2023**  
**Re: Update on LD 2003 / LD 1706**

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LD 2003 was signed into law in April 2022 and requires municipalities to amend or create new zoning ordinances. It was designed to remove regulatory barriers to housing production, allow additional density for affordable housing developments, additional dwelling units per lot in residential areas, and accessory dwelling units on the same lot as a single-family home.

LD 1706 clarifies the implementation date. The implementation date for Caribou is January 1, 2024. I'm not convinced this is a reasonable target. The Department amended 19-100 CMR Chapter 5. That final rule was effective October 1, 2023.

Housing Opportunity Program grant funding is available for service providers to support municipal ordinance development. The City of Caribou supported the application of Northern Maine Development Commission (NMDC) to obtain a 2023 Service Provider Grant. They were awarded the grant and could begin work on October 1, 2023.

This legislation has established the Housing Opportunity Program within DECD and they are providing guidance (enclosed).

The actions that will need to be taken by the City of Caribou:

- Work with NMDC for ordinance development.

Other considerations:

- City can add provisions. Example: that one unit per lot with an ADU is owner-occupied.
- Many areas of Caribou are served by subsurface wastewater disposal systems.

**REQUESTED ACTION:**

No action needed, this is for discussion so that staff can get direction.

**PL 2021, ch. 672  
(LD 2003)**

# **Housing Opportunity Program**





# LD 2003 Overview



- Signed by Gov. Mills in April 2022 to increase housing opportunities in Maine by requiring municipalities to amend or create new zoning ordinances.
- Designed to remove unnecessary regulatory barriers to housing production, while preserving local ability to create land use plans.
- Broadly, LD 2003 allows:
  - For additional density for affordable housing developments;
  - The addition of between 2 and 4 dwelling units per lot in residential areas;
  - Accessory dwelling units on the same lot as a single-family home.
- Includes requirements that the
  - State establish housing production goals; and
  - Municipalities align ordinances with the federal Fair Housing Act and Maine Human Rights Act.
- Established the Housing Opportunity Program in DECD.



# Why does LD 2003 matter?

- LD 2003 is one tool to support the development of additional housing units in Maine by encouraging the development of many different types of housing, including affordable housing units. Not all units built according to the requirements in LD 2003 must be "affordable" as defined by HUD.
- LD 2003 removes regulatory barriers to creating additional housing, while allowing municipalities to:
  - Continue to create land use plans and protect sensitive environmental resources through comprehensive planning;
  - Regulate housing development based on documented water and wastewater capacity constraints;
  - Enforce shoreland zoning; and
  - Create rate of growth ordinances.

# Affordable Housing Density Bonus

30-A M.R.S.  
§ 4364

- Creates an automatic density bonus for certain “affordable housing developments.”
- To qualify for bonus, development must
  - ✓ Be approved on or after a municipality's implementation date;
  - ✓ Designate more than 51% of the units in the development as affordable;
  - ✓ Be in a designated growth area as defined by Maine law or served by public water and sewer or a comparable system;
  - ✓ Be in an area in which multifamily dwellings are allowed;
  - ✓ Meet shoreland zoning requirements, meet minimum lots sizes if using subsurface waste disposal, and prove that water and sewer capacity is adequate for the development.

# Affordable Housing Density Bonus

30-A M.R.S.  
§ 4364

- What is a designated growth area?

- An area designated in a municipality's comprehensive plan that is suitable for development, especially over the next 10 years.

- If eligibility requirements are met, the affordable housing development qualifies for the following exceptions to zoning requirements:

- The number of units allowed will be 2.5 times greater than the number allowed for a development not designated as affordable (**base density**).
- The off-street parking requirements may not exceed 2 spaces for every 3 units.

# What does “affordable” mean?

- For rentals: a household with an income at no more than 80% of the area median income for the community, as defined by HUD, must be able to afford at least 51% of the units in the development.
- For homeowners: a household with an income at more than 120% of the area median income for the community, as defined by HUD, must be able to afford at least 51% of the units in the development.
- Affordable units must be restricted through a restrictive covenant for at least 30 years.

Area Median Income:

- updated annually by HUD
- AMI data available on [MaineHousing's website](#)

## 30-A M.R.S. § 4364-A, Residential Areas; Up to 4 Dwelling Units

- Requires municipalities to allow between 2-4 dwelling units on lots where residential uses are allowed, with evidence of sufficient water and wastewater capacity.
- Municipalities may not apply different dimensional requirements to lots with more than one housing unit on them than they would to a lot with one housing unit, with the exception that minimum lot area per dwelling unit can be required, as long as the lot area required is not less for the first unit than for subsequent units.



# Number of Units

## General Rule: Up to 2 Units

- Generally, a municipality must allow up to 2 dwelling units per lot if that lot does not contain an existing dwelling unit.
- A lot with an existing dwelling unit may have up to two additional dwelling units either attached, detached, or one of each.

## Exception: Up to 4 Units

- A municipality must allow up to 4 units on a lot that permits residential uses if the lot does not contain an existing unit and:
  - Is located within a designated growth area; or
  - Is served by public water and sewer (or a comparable designation) in a municipality without a comprehensive plan.

Municipalities may allow more than the minimum number of units described above.

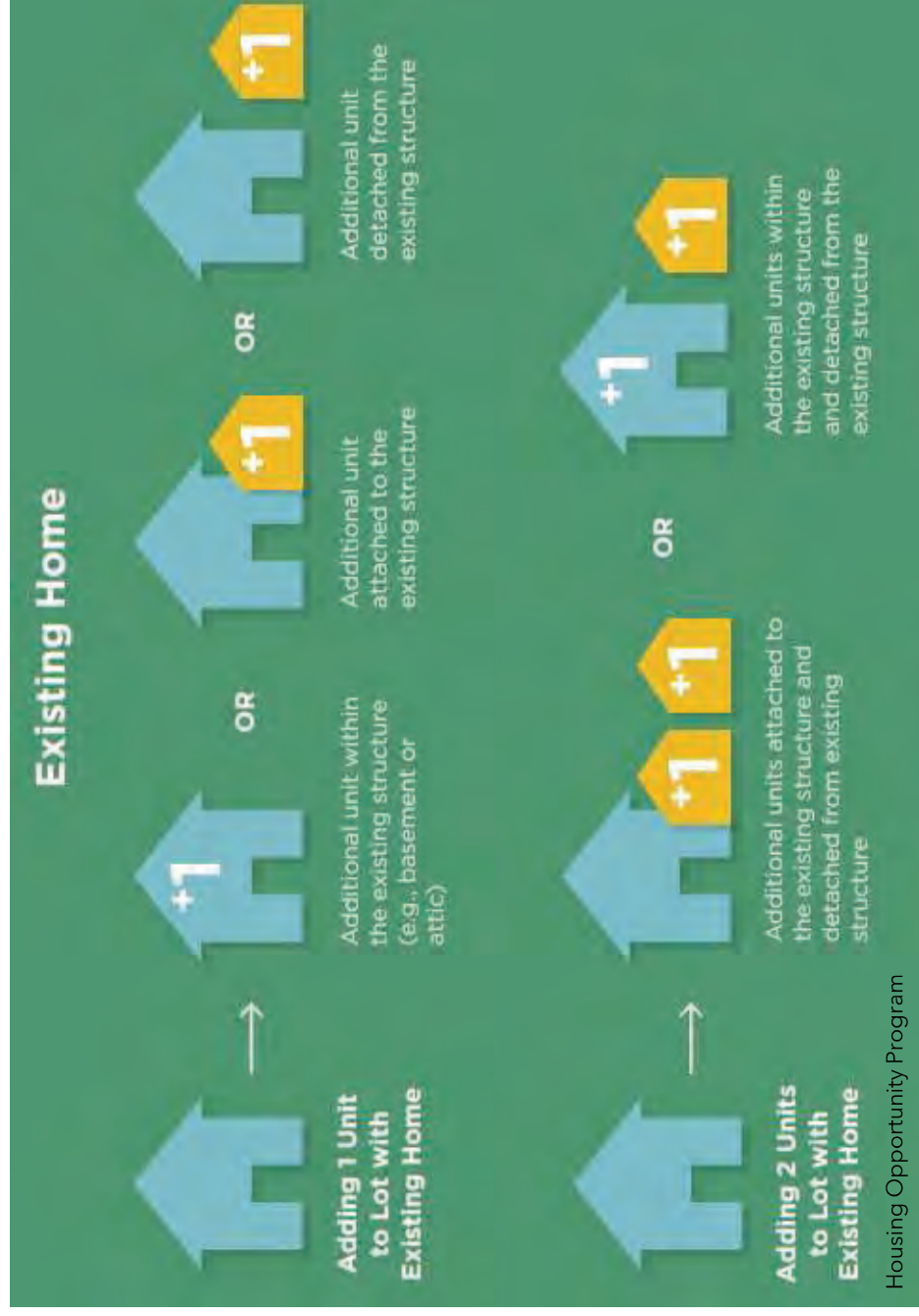
# Example 1: Empty Lot\*



\*Or a lot without an existing residential unit



# Example 2: Existing Home

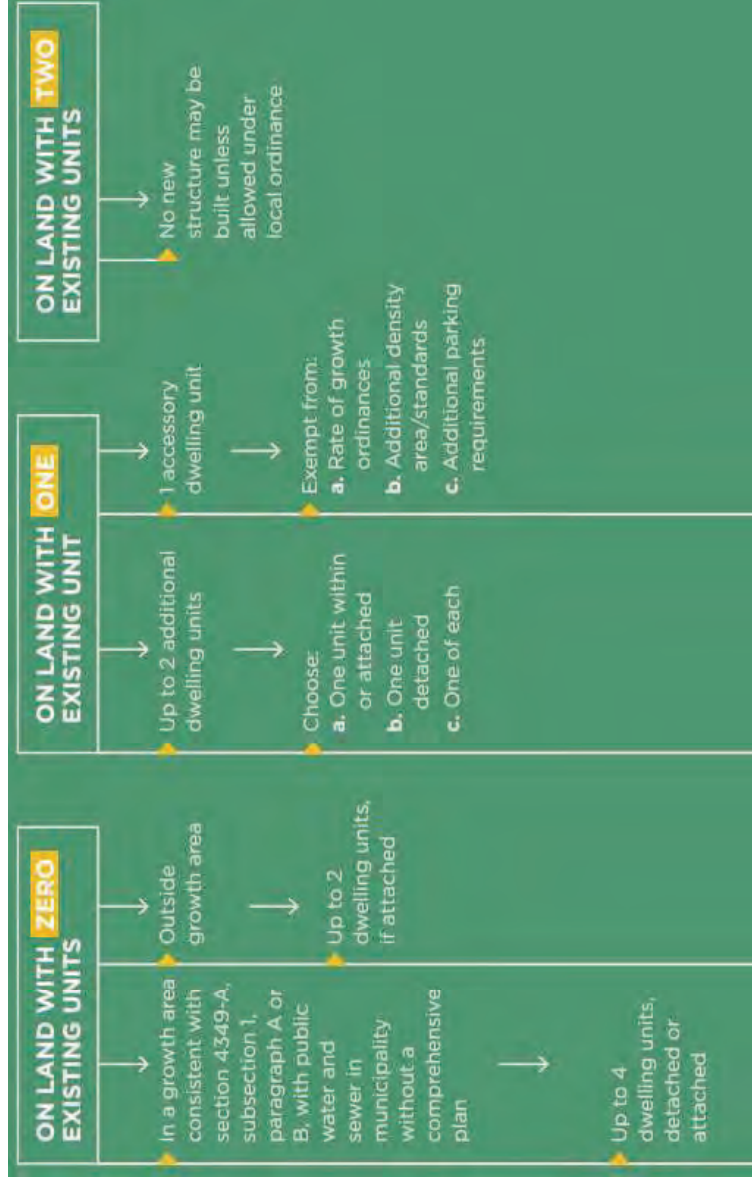


**Note:** Orange units in diagram are intended to be dwelling units, not accessory dwelling units. 30-A M.R.S. 4364-A only governs dwelling units, not accessory dwelling units.

Municipalities can define dwelling unit and accessory dwelling unit in local ordinance to differentiate between the two structure types.

# Restrictions on Additional Density

- If more than one dwelling unit is constructed as a result of this section of LD 2003, the lot is not eligible for any additional increases in density, unless otherwise allowed by the municipality.
- For example, if a lot owner constructed a duplex on a lot with an existing single-family home, a lot owner would not be able to build an accessory dwelling unit on that lot as well, unless this was permitted in local ordinance.



# Accessory Dwelling Units

30-A  
M.R.S.  
§ 4364-B

- This section allows a lot with a single-family dwelling in an area where residential uses are allowed, including as a conditional use, to have one accessory dwelling unit.
- The ADU can be:
  - Within the existing home;
  - Attached to it; or
  - A new structure.
- An ADU is exempt from zoning density requirements but the dimensional requirements, including setback requirements, for a single-family home continue to apply unless the municipality makes them more permissive.

# ADUs

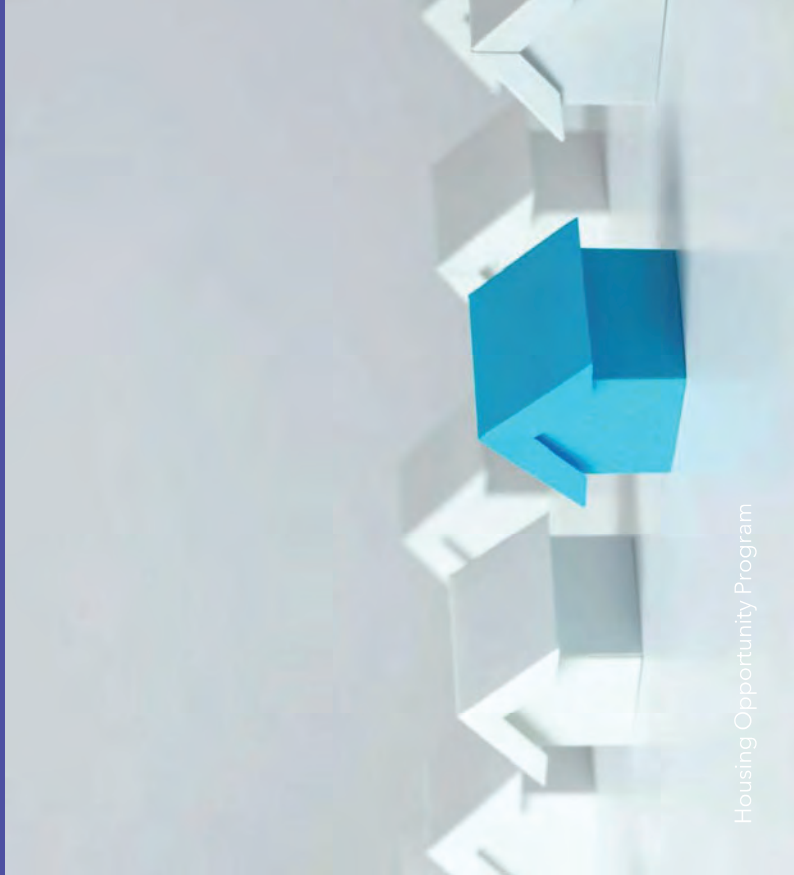
## 30-A M.R.S. § 4364-B

- A municipality may not require additional parking for the addition of an ADU (except those allowed for the single-family unit).
- ADUs must be at least 190 square feet in size. Municipalities can set a maximum size.
- Municipalities may establish an application and permitting process for ADUs that does not require planning board approval.
- An ADU is permitted on a lot that does not conform to the municipal zoning ordinance, if the accessory structure does not further increase the nonconformity.
- Municipalities may regulate short term rentals in local ordinance.
- An accessory dwelling unit that was not built with municipal approval must be allowed if the accessory dwelling unit otherwise meets the requirements for accessory dwelling units of the municipality and under this section

## Other land use standards to consider

- Valid and enforceable easements, covenants, deed restrictions and other agreements or instructions between private parties still apply, as long as the agreement does not restrict constitutional rights.
- Subdivision law may still apply to lots.
- Shoreland zoning still applies to lots located within the shoreland zone.
  - Municipalities cannot categorically prohibit ADUs in the shoreland zone but municipal shoreland zoning ordinances *may* restrict the addition of an ADU.
- Developments must comply with minimum lot size requirements in accordance with Title 12, chapter 423-A, as applicable.
- All units must be connected to adequate water and wastewater services before the municipality may certify the development for occupancy.

# Implementation Date



**P.L. 2023, ch. 192** (LD 1706) An Act to Clarify Statewide Laws Regarding Affordable Housing and Accessory Dwelling Units

- This legislation changes the implementation date for municipal compliance to the following:
  - January 1, 2024, for municipalities for which ordinances may be enacted by the municipal officers without further action or approval by the voters of the municipality; and
  - July 1, 2024, for all other municipalities

# Rulemaking

The Department is in the process of amending 19-100 CMR Ch. 5 because of the passage of LD 1706.

Public Comment	Summary of Comments	Adoption
August 2-September 11	September 2023	Late September/ Early October 2023



## Which statutes of LD 2003 apply to my municipality?

### Affordable Housing Density Bonus

30-A M.R.S. 4364

Applies to municipalities with:

- (1) Adopted density requirements and
- (2) Designated growth areas OR public water/sewer

### Up to Four Dwelling Units

30-A M.R.S. 4364-A

Applies to all municipalities.

Number of allowed units on a lot will depend on whether:

- (1) a lot is within a designated growth area OR
- (2) a lot has public water/sewer in a municipality without a comprehensive plan

### ADU

30-A M.R.S. 4364-B

Applies to all municipalities

## Key Questions to Consider during Ordinance Review

- Does my town need to amend existing sections or create new sections of ordinance to comply with LD 2003?
- Does my town have established density requirements?
- Does my town allow multifamily housing?
- Where are my towns growth areas, if applicable?
- Where is public water and sewer located, if applicable?
- What are my town's parking requirements, if applicable?
- What are my town's procedures for determining "adequate water and wastewater?"
- Does my town have water/sewer systems that could be considered "comparable systems?"
- Some provisions of LD 2003 allow for municipal choice (*may* vs. *must*) . Does my municipality want to set standards in these areas? See next slide.

# Options to Consider during Ordinance Review

30-A M.R.S 4364-A	Allow additional dwelling units than the number required pursuant to 30-A M.R.S. 4364-A
	Establish a prohibition or allowance for lots where a dwelling unit is torn down and an empty lot results
	Establish an application and permitting process for housing structures
	Impose fines for violation of building, zoning and utility requirements for housing structures
	Establish alternative, less restrictive criteria for granting variances pursuant to 30-A 4354(4).
30-A M.R.S. 4364-B	Allow ADUs in accessory structures
	Establish more permissive dimensional requirements, including set back requirements for ADUs.
	Establish a maximum size for ADUs
	Establish an application and permitting process for ADUs that does not require planning board approval
	Impose fines for violation of building, zoning and utility requirements for ADUs
	Establish alternative, less restrictive criteria for granting variances pursuant to 30-A 4354(4).

# Questions?

Hilary Gove and Benjamin Averill

Housing Opportunity Program Coordinators

[housing.decd@maine.gov](mailto:housing.decd@maine.gov)

<https://www.maine.gov/decd/housingopportunityprogram>

Update on grant funded projects (and other good stuff) October 11, 2023

<a href="#">EPA Brownfields FY2023</a>	Diesel Plant and other outbuildings	\$900,000
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Qualified Environmental Professional has been selected – County Environmental Engineering, Inc  
ASAP payment portal is all set up to be able to receive grant funding.  
Cooperative Agreement has been received from the US EPA.  
Grantee training in Biddeford on September 14, 2023 & Massachusetts on September 27.  
Online ACRES (reporting portal) training ongoing.  
Funding anticipated anytime.

<a href="#">CERLA</a>	EPA Emergency Action on Steam Plant	UNKNOWN
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Action plan from US EPA Region 1 has been received. EPA / DEP onsite, waiting for more information.

<a href="#">Northern Border Regional Commission (NBRC)</a>	Riverfront Plan & Projects	\$472,550
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Paperwork to accept grant and start environmental review paperwork submitted.  
Mandatory Grantee zoom was 9/27. LDD Contract approved at 10/10 City Council meeting.  
Story on WAGM, Tuesday 9/26.

#### [Congressionally Directed Spending Requests](#)

FY2022	Senator Collins	Police Station	\$2.5 million
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Working with Artifex. No word on when any funds will be made available.

FY2022	Senator Collins	Mill Pond Reconstruction / Dam / Fishway	\$4.4 million
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Paperwork submitted. No word on when any funds will be made available.

FY2023	Senator Collins	Improvements to Fire Station	\$1.359 million
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Cleared the appropriations committee, waiting for full budget approval.

FY2023	Senator King	Energy improvements at Library (with a GOPIF request)
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Cleared the appropriations committee, waiting for full budget approval.

#### [ARPA NEU Funds](#)

2021	Broadband Study
2022	Used as match for County ARPA project
2023	Used as match for County ARPA project

#### [ARPA – Aroostook County matching funds](#)

FY2022	Improvements to Fire Station & Ambulance equipment	\$150,000
FY2023	Fire department turn-out gear, Police body worn cameras & radios	\$100,349

The Enterprise Grant through the Maine Tourism Marketing Partnership Program was a reimbursable grant through the Maine Office Tourism. With this \$10,000 grant, the City was able to build out the [cariboumaine.org/visit](http://cariboumaine.org/visit) website with the tagline “Caribou is Calling” with a QR code and increased the social media presence. We advertised on the Maine State Highway Map, the Maine Snowmobiler, “The County” Guidebook from NMDC and the Bangor Daily Fall insert. Caribou even caught the attention of Yankee magazine who published a snowmobile adventure video (free) and the banner purchased with grant funds was featured prominently in the background of an interview the City Manager gave on the Weather Channel. The invoice has been paid to reimburse the city for those approved expenses.

#### Façade Improvement

The semi-annual façade improvement grant application period has closed. Meeting with applicants 10/13 to make recommendations to the City Council on awards.

#### Broadband

Charter / Spectrum applied for and was awarded a grant from the Maine Connectivity Authority (MCA) for last mile access in Caribou. There are contract issues to be resolved. Hoping for an update soon.

DEP Small Communities Grant – we are working with one resident to have a new septic field installed.

Possible Future DOT RAISE grant (Rebuilding American Infrastructure with Sustainability and Equity)

Step 1 - Department of Transportation, Village Partnership Initiative – **RFP is out now (due Friday)**

The Caribou City Council has appropriated \$50,000 to pay for half of a DOT VPI transportation plan.

Other Aroostook County municipalities who are using this program are: Ft. Kent, Madawaska, Van Buren, and Presque Isle. Jarod, our DOT area representative, hopes to take projects that the communities support and roll them into a large Aroostook County RAISE grant.

I have also talked to MeDOT Region 5 about repairing the fences (owned by MeDOT) on the City’s southern gateways on Route 1.



**City Manager's Report  
October 10, 2023**

**Economic Projects**

<b>River Front - Powerplants</b>	Met with EPA & DEP at the Riverfront Power Plants site to discuss CERCLA action. EPA contractors were also at the site to determine how to proceed with removing compromised materials from the building.
<b>Broadband Initiative</b>	The contract between the Maine Connectivity Authority and Charter / Spectrum was due back to MCA by 09/30/2023.
<b>CDBG</b>	No new updates.
<b>Ogren Dump Solar Project</b>	No new updates.
<b>Events and Marketing</b>	The 49th Annual Caribou Craft Fair is October 21 & 22 10-4 at Caribou High School with over 135 vendors. This is Aroostook County's oldest and largest Craft Fair and has really put Caribou on the map.
<b>Landbank</b>	No new updates.
<b>Chapter 13 Rewrite</b>	No new updates.
<b>Federal American Rescue Plan Act</b>	No new updates.
<b>Blight Cleanup</b>	Some owners are trying to do the right thing by working with the City, others are ignoring our efforts.
<b>Birdseye Cleanup</b>	No new updates.
<b>Caribou Development Committee</b>	Next meeting is October 18th at 6:00 pm
<b>River Front - Master Plan</b>	LDD contract is on tonight's agenda.
<b>Façade Improvement Program</b>	The application period has closed. Staff will bring a recommendation to the City Council at the next meeting.
<b>Aldrich ATV/Snowmobile Storage</b>	No new updates.
<b>Caribou Economic Growth Council</b>	Next meeting is October 26th at 7:00 am
<b>Business Outreach</b>	Fall business newsletter is in the works. Small business Saturday is November 25.



Other Administrative Projects	
<b>Tax Acquired Property Policy</b>	See additional information on this subject.
<b>Nylander</b>	Saturday October 14 @ 9:00 am will be the soft opening for the Nylander Museum.
<b>Fire Structural Work</b>	No new updates.
<b>Fire Station Renovations</b>	No new updates.
<b>Police Station</b>	No new updates.
<b>River Road</b>	No new updates.
<b>Investment Policy</b>	No new updates.
<b>Trailer Park Closure</b>	No new updates.
<b>Cable Franchise Renewal</b>	No new updates.
<b>Airport</b>	No new updates.
<b>Personnel Policy</b>	No new updates.
<b>New LED Street lights</b>	No new updates.
<b>Comp Plan Update</b>	Community Visioning and Update Session will be held on Thursday October 26 @ 6:00 pm at the Wellness Center. All are invited. Childcare provided.
<b>LD 2003 Implementation</b>	NMDC received funding to begin working on this October 1.
<b>15 Prospect Street</b>	Several meetings with owner.
<b>Water Street Fire</b>	On tonight's agenda.
<b>Age-Friendly Efforts</b>	No new updates.
<b>Personnel Changes</b>	Public Works, Caribou Police Department, Caribou Public Library and Caribou Code Enforcement all hiring.
<b>DOT Village Partnership</b>	RFP is out. Bids due back October 13.
<b>Aroostook Waste Solutions</b>	Construction of 5&6 underway despite all of the rain, only delayed 2 weeks.
<b>Cary Medical Center</b>	100th Anniversary in 2024. Planning underway. If you have old photos, memorabilia or stories, please reach out to Bill Flagg.
<b>Administrative Approvals</b>	Jade Palace, Par & Grill and Caribou Inn and Convention Center liquor license and Special Amusement permits
<b>Other Updates</b>	Congratulations to Spud Sweedway for a successful Caribou Dust Bowl.

# Monthly Permit Report

September 2023

	CURRENT MONTH	YEAR TO DATE	PRIOR YEAR MONTH	PRIOR YEAR TO DATE
BUILDING PERMITS	3	35	5	45
HOMES	0	4	0	2
MOBILE HOMES	0	0	0	2
MULTI-FAMILY	0	0	0	0
COMMERCIAL	0	11	0	5
EXEMPT	0	4	0	1
PLUMBING PERMITS				
INTERNAL	1	12	0	11
EXTERNAL	0	9	1	6
DEMO PERMITS	0	9	1	16
SIGN PERMITS	0	3	1	12

Year-to-Date is      January 2023                      to                      September 2023