

ASO/ASC Task Force Comments on Proposed Architectural Standards Fee Changes

Please find below the comments to 45-day notice "Architectural standards fee schedule changes", which has been discussed by AS Task Force members.

Background comments.

Architectural Standards Task Force discussed similar fee schedule a year ago and all agreed, that the actual numbers are less important than the ASO practices. We had seen from our several surveys, that both members and build/design professionals were not overly concerned about the fees being too high. Their (and our) concerns were about when and how the fees are applied and through what processes.

We believe, that ASC have enough reasons to revise some administrative and inspection fees, as outlined the 45-day notice.

We do have concerns about the proposed Revision Fees. They seem reasonable only in cases, where revisions to the project are significant and processing requires significant amount of time. This is most likely not true regarding Minor Projects without neighbor notifications. And this is probably not true for a wide variety of revisions, not just the color changes. It will be important that the proper language should be added to the rule of applying such fees. Otherwise ASO may start automatically applying revision fees, which would only discourage project owners to seek revision approvals.

We oppose introduction of the new type of fees: "Non-Permitted Improvement Fee". If an inspector files an instance of non-compliance to Architectural guidelines either during HOIP or during project inspection, ASO issues Notice to Comply. The change required to comply with the guidelines may include improvements, which should be submitted to ASO as a project with existing corresponding fees. However, if ASO finds some rule-compliant features, which are missing in ASO files or in current project documentation, it is not in HOA interests to make a "project" of it with extra paperwork, expenses, and fees. The findings should be just added to the property file. Such practice was explicitly recommended by the Task Force more than a year ago.

The following changes should be made in 2020 Architectural Standards Fee Schedule and the explanations attached to the "schedule":

1. Revision fees may be applied only for Major Projects and Minor Projects with neighbor notification.
- 2nd revision. Please add language "2nd revision with multiple items". Add comments explaining "multiple items" as "requiring more than 1hour of processing by ASO and ASC". (or another metric instead of 1hour)
2. Remove revision fees for Minor Projects without neighbor notification.
3. Remove change of administrative fees based on "non-permitted improvement fee".
4. Add explanation in the comments what is defined by "Full Committee Resubmittal New Admin Fee"

Thank you,

-Pavel Bosin on behalf of Architectural Standards Task Force members.