From: Kyle Falbo [redacted]
Sent: Friday, November 13, 2026 5:53 AM
To: Public Comment Received For City Council <citycouncil@cityofsebastopol.gov>
Subject: Public Comment for Agenda Item Number 5

Councilmembers, Staff, and the Public,

While I recognize the value of establishing a consistent and efficient process for considering special event permit fee waivers, I'm concerned that the goal of administrative efficiency may obscure a more consequential policy decision: under what circumstances should Sebastopol taxpayers be expected to subsidize the operating costs of events organized by outside entities?

The staff report frames this proposal primarily as an opportunity to streamline requests from community organizations, particularly smaller events. Yet the financial history presented in the report tells a different story about where the overwhelming majority of these subsidies are going.

Over the two completed fiscal years, the City waived more than $52,000 in special event fees. Approximately $41,000 of that amount was associated with just four event approvals: the Apple Blossom Festival and July 3 fireworks events in each of those years.

Compare that with the Kiwanis Easter Egg Hunt, which received a $400 waiver in each year.

A policy designed to simplify a $400 fee waiver for a community Easter egg hunt should not inadvertently establish an administrative pathway for approving recurring subsidies of $6,000, $13,000, or $15,000 without meaningful public scrutiny.

These are fundamentally different financial decisions, and they deserve different levels of oversight.

My concern is when waived fees represent actual expenditures by the City, rather than simply forgone administrative revenue. Police overtime, additional public works staffing, and other event-specific expenses represent real costs that would not necessarily exist without the event. When the City waives recovery of those expenses, it is not simply helping an organization navigate the permitting process. It is choosing to transfer the financial responsibility for those services to the public.

That distinction matters in a city facing persistent fiscal constraints and difficult decisions about the services it can afford to provide.

I recognize that events such as Apple Blossom and the July 3 fireworks are valued community traditions. They may generate economic activity, support local businesses, and contribute to Sebastopol's cultural identity. Those benefits deserve consideration. But the existence of a public benefit should not establish that the public absorb the costs of producing an event.

Nor should an organization's nonprofit status, by itself, establish financial need or justify a subsidy.

If the City believes certain events merit public financial support, I would rather see those expenditures explicitly identified, evaluated, and budgeted as community investments than concealed within an administrative fee-waiver process.

Before directing staff to develop this policy, I encourage Council to get answers to several questions:

1. What costs are actually being waived? How much of the reported $58,406 in waivers represents administrative fees, regular staff services, police overtime, public works expenses, or other direct expenditures? Council should have this breakdown before establishing a policy that could delegate approval authority.

2. Should actual incremental expenses be eligible for administrative waivers at all? If an event requires additional police staffing or overtime, why should the organizer not ordinarily be responsible for those costs? Shouldn't any exception require an explicit public funding decision?

3. What distinguishes a small community event from a major recurring event? Should an Easter egg hunt requesting $400 receive the same consideration and approval process as a paid entry festival requesting more than $13,000? At what financial threshold should Council review remain mandatory?

4. How will the City evaluate financial need and public benefit? Will applicants disclose event revenues, sponsorships, admission fees, fundraising, and available reserves? How will the City distinguish between an organization that cannot afford its costs and one that has simply incorporated a municipal subsidy into its recurring operating model?

5. What is the cumulative financial obligation being created? If annual waivers routinely exceed $25,000, should that amount be explicitly appropriated in the City's budget rather than treated as a series of individual exceptions? How will Council ensure these expenditures are considered alongside competing priorities for limited General Fund resources?

6. How will the public retain meaningful oversight? If approval authority is delegated to staff, what reporting requirements, financial limits, and public review mechanisms will prevent significant recurring subsidies from becoming routine administrative decisions?

I would encourage Council to amend its direction to staff to explicitly require the policy to address these concerns.

Specifically, I recommend that the policy:

- Distinguish administrative permit fees from direct service costs, including police overtime, additional public works staffing, and other incremental expenditures.
- Presume full cost recovery for event-specific incremental expenses, with exceptions requiring explicit Council authorization and identification of a funding source.
- Establish clear dollar thresholds for delegated approval, allowing genuinely small requests to be processed efficiently while preserving Council oversight of substantial waivers.
- Require financial disclosure and a documented public-benefit justification for organizations seeking significant or recurring subsidies.
- Establish an annual budget for event subsidies, rather than permitting fee waivers to create an open-ended obligation against the General Fund.
- Require annual public reporting identifying the recipients, amounts waived, actual city service costs, and cumulative subsidies provided to recurring events.
- Evaluate recurring events as recurring financial commitments, rather than treating each year's request as an isolated exception.

I also encourage Council to consider whether direct financial support for major community events should be addressed through a separate, transparent community sponsorship or grant process. Such a process would allow the City to recognize the value of these events while evaluating their financial support alongside other community priorities.

I am not opposed to the City supporting community events. Nor am I opposed to simplifying the administrative process for small organizations providing meaningful public benefits.

What concerns me is the possibility that a policy presented as administrative streamlining could normalize the ongoing public subsidy of substantial event operating costs without adequate financial accountability.

The staff report correctly identifies consistency, transparency, and efficiency as desirable outcomes. I would ask Council to ensure that fiscal responsibility and meaningful public oversight are equally explicit objectives.

Sebastopol should be able to make it easier to approve a $400 Easter egg hunt waiver without making it easier to commit $14,000 in public resources to a recurring festival.

Those are not contradictory goals. They simply require a policy that recognizes the difference.

- Kyle Falbo