



Responsible Growth in Marin

January 24, 2022

To: Jacob Noonan

CC: Ali Guidice, Leslie Mendez, Mayor Colin, City Council Members

Re: Planning Commission, January 25, 2022 - Design Review Advisory Committee (DRAC) One Year Pilot Program – FOR PUBLIC RECORD

Honorable Commissioners,

The Design Review Board Advisory Subcommittee (DRAC) pilot began operating in March, 2020, during the Shelter-in Place order, and apparently has been functioning ever since then (21 months) with no formal authorization from the Planning Commission or City Council, no written guidelines for its operations, no public notice or participation in the meetings, no public records of DRAC meetings and decisions, and no public evaluation of the actions of this existing de facto “pilot” committee. Despite significant concerns and questions raised by the public, City Council and Design Review Board at meetings in September and November 2020 and February 2021, this proposal is being presented to you again for your endorsement with many of the concerns and questions still unanswered.

Responsible Growth in Marin (RGM) recommends that an evaluation report of the actions of this “de facto” Design Review Board subcommittee over the last 21 months be presented to the Planning Commission, City Council, and public before extension of the “pilot” DRAC for an additional year be considered. Distinctions between operation of the “de facto” subcommittee and operations of the proposed DRAC committee need to be delineated.

In addition, RGM requests the following questions and concerns be addressed before approval of the proposed one year “pilot” of the DRAC:

- How will the pilot project be evaluated? By whom? With what criteria? Criteria for evaluation and the evaluation procedure need to be specified in the pilot project description before the pilot project begins.
- DRAC composition: If there is only one alternate, then the DRAC will end up with either two architects or two landscape architects when an alternate is substituting for a regular DRAC member. How can this be considered appropriate design review of any project?
- Projects subject to DRAC review (Purpose and Authority): What is the criterion of a small project? 10 units in a high-density residential area may be a small project, but the

same project would be a large project in a low-density residential area. Good design is critical in such circumstances. The criteria for project eligibility need to be changed to set different thresholds for different types of residential areas. The full Design Review Board should evaluate design and environmental review for projects greater than 4 units in low-density neighborhoods and for projects in high-risk areas, such as hillside developments or fire prone areas.

- Public Notice: The pilot program description specifies that projects subject to DRAC review at a Planning Commission meeting will receive public notification in tandem with notification of the Planning Commission meeting. What public notification will be given for meetings of the DRAC on projects subject to Zoning Administrator or staff level review?
- Referral to full DRB: Should referral to the full DRB be required (not optional) when requested by staff or board member? Section E of the Pilot Program description is very vague. Who will determine if a project “would benefit from the full Design Review Board due to proposed design, size, or surroundings”? What about projects that are controversial in a community? Should referral to the full DRB be required when requested by member of the public?
- Concerns raised by the Design Review Board at their 2/17/22 meeting need to be addressed (limited input from only 2 DRB members may lead to less-than-ideal design; overly strong influence of the single architect on DRAC [loss of variety of opinion and expertise]; increased workload for DRB members on DRAC) Should membership on the DRAC be rotated during the one year of the pilot project in order to give more DRB members the chance to participate (or respite from participation)?
- We concur with recommendations that all DRAC meetings will be clearly identified on the City’s Meetings and Agendas web page and that Planning staff shall indicate on the “Project Referral / Transmittal” Sheet and on the project website whether the project will be reviewed by the Full 5-member Design Review Board or DRAC. This should be specified in the pilot project description.

RGM strongly recommends that these concerns and questions be resolved before the Planning Commission proceeds with endorsing the one-year DRAC pilot project.

Thank you for your consideration on this important service to our community.

Respectfully submitted,
Responsible Growth in Marin
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