



General Public Comment Received

Name of Sender	Distributed prior to hearing	Distributed after the hearing
1. Richard Closson	x	

From: [Richard Closson](#)
To: [Community Development PC Secretary](#)
Subject: Objective Design Standards With a Touch of the Human
Date: Tuesday, February 8, 2022 4:36:12 PM

EXTERNAL

Dear Planning Commissioners,

I am sending to you an excerpt from an email I previously sent to the City Council. It draws on a building proposal of local interest that we can view at arm's length. Phew! But it might be a warning of things to come.

"I'll bring to the Council's attention (but mostly to staff) an issue out of its purview, but of interest for its application to City matters, specifically the design of Munger Hall on the UCSB campus. The project is as complex as the many published opinions on it. Not least is the question of whether any public input (largely negative) will impact the University's decisions. I am struck, though, by a quote from a respected architect who writes as objectively as he can on the strongly subjective notion of design review: *'...there is nothing illogical or illegal about the building. Contrary to what some people have claimed, it meets all current codes, (even the windowless bedrooms). Munger could hand this project in for his Architect Registration Examination and pass with flying colors. That in and of itself is scary'* (1)

"The local importance of the quote is this. In many words, the author is describing 'ministerial review.' Having a building project merely meet the minimum standards of codes (some of which may have been written before the importance of their precise interpretation was anticipated) can deliver unanticipated bad outcomes. This is not a prejudged criticism of City staff or their abilities to interpret styles or apply standards. It is only to raise concern that project review guidelines and standards must be written to mean what we want, not what we think they mean.

"Recently a noted public lecturer presented an image worth a thousand words, juxtaposing a portion of our much lauded and landmarked Spanish Colonial Revival style County Courthouse and the nearby County Administration Building. The former defines its style, while the latter meets the minimum review standard for compliance. **White stucco?** Check. **Arches?** Check. **Red tile roof?** Check. **Iron window grilles?** Check. **Integrated sandstone?** Check. **Bracketed eaves?** Check.

"In this new year, City staff and design review boards will continue to work on objective design standards leading to ministerial review of many projects. I support the intent to minimize capricious evaluations of projects based on subjective standards or strange interpretations of objective ones. Whether we can save the baby while discarding the bathwater will be an ongoing conundrum."

The point made best by the photo is that design standards, whether subjective or truly objective, can fail in their intent if not applied with care. None of us want that. There should always be room for a certain human interpretation regardless of how complete and objective we believe a standard is.

Regards,
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(1) <https://www.architectmagazine.com/design/buildings/the-munger-dorm-is-bad-but-why>

