



**STAFF REPORT**  
**CITY OF BEVERLY HILLS**

**For the Architectural Commission  
Meeting of August 17, 2011**

**TO:** Architectural Commission  
**FROM:** Michele McGrath, Senior Planner  
**SUBJECT:** Discussion of Restaurant Permit Streamlining

**EXECUTIVE SUMMARY**

At its August 4, 2011 meeting, the Planning Commission discussed streamlining restaurant review procedures pursuant to direction from City Councilmembers and in accordance with the goals of the Mayor's Task force on Governmental Efficiency. Architectural Commissioners Richards Rubens and Allen Rennett attended the meeting. To achieve a stated goal of permitting restaurants within 70 days of application to the City, the Planning Commission considered a variety of recommendations (see attached report). As the report states, having a discretionary review component in the restaurant streamlining process is the single greatest challenge in reducing the review to less than 70 days. The Planning Commission confirmed the importance of the Architectural Commission's role but, in the interest of meeting the goal of permit streamlining, has requested that the Architectural Commission consider the following:

Architectural Commission reviews, with regard to restaurants, that could potentially be handled by staff;

The potential for developing guidelines that could guide staff's reviews;

The opportunity to develop guidelines for temporary enclosures for outdoor restaurant space; and,

The possibility of having two Architectural Commission meetings a month or setting up a permanent subcommittee of the Architectural Commission that could meet more quickly and frequently when required to review restaurant façade/signage/outdoor dining applications.

The Architectural Commission's recommendations will be forwarded to the Planning Commission.

A handwritten signature in blue ink that reads "Michele McGrath".

Michele McGrath





**City of Beverly Hills**

**Planning Division**

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## Planning Commission Report

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**Meeting Date:** August 4, 2011

**Subject:** **Streamlining Restaurant Review Procedures** Discussion and possible direction to staff to prepare a resolution recommending to the City Council an ordinance amending various sections of the Beverly Hills Municipal Code that relate to restaurant uses, including possible amendments to: Article 27 (Other Use and Building Restrictions); Article 28.6 (Hotel Regulations); Article 30 (Architectural Commission, Architectural Review, And Procedure); Article 31 (Development Plan Review); Article 33 (In Lieu Parking); and, Article 35 (Open Air Dining). These amendments modify or eliminate certain restaurant-related permit requirements; shift the review authority of some permits from the City Council to the Planning Commissions and from the Planning Commission and Architectural Commission to the Director of Community Development; and, modifies standards related to off-site parking. Other amendments update outmoded references and seek to improve code administration.

PROJECT APPLICANT: CITY OF BEVERLY HILLS

**Recommendation:** It is recommended that the Planning Commission review the recommended amendments; provide direction to staff as appropriate; direct the preparation of a resolution and draft ordinance; and continue the public hearing to September 8, 2011.

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### REPORT SUMMARY

This report identifies approaches that would facilitate timelier permitting of restaurant applications and associated text amendments that would be required to complete most reviews within 70 days. An analysis of the amendments is presented as well as additional options to help promote more restaurant opportunities in the future. Included in this report are recommendations to implement these changes. It is anticipated that the subject public hearing would be continued and that the Planning Commission would direct staff to prepare a resolution and draft ordinance for its review in September.

**Attachment(s):**

- A. BHMC ARTICLE 19.5: COMMERCIAL-RESIDENTIAL TRANSITION;  
GENERAL OPERATIONAL REQUIREMENTS
- B. Public Notice

**Report Author and Contact Information:**

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## **BACKGROUND**

Last March Mayor Brucker created a Task Force on Governmental Efficiency that is chaired by Vice Mayor Brien and co-chaired by interim Planning Commissioner, Noah Furie. Additional task force members have been selected and several meetings have been held. Related to the goals of the task force, the Vice Mayor, with support of Mayor Brucker, directed staff to develop options to streamline restaurant permitting procedures. It is expected that options to reduce restaurant permitting (final action) to less than 70 calendar days be presented to the City Council within six months from the announcement, or September/October 2011.

To achieve this goal, staff is presenting a variety of recommendations to the Planning Commission (PC) and is conducting public hearings in accordance with that timeline. Some of the proposed amendments affect the review authority of the Architectural Commission (AC). The AC members have been informed and encouraged to participate in the hearing process before the PC. The recommendations presented in this report have not been reviewed or commented upon by the AC.

## **DISCUSSION**

The specific direction to staff was to develop a process that would enable an application for a new restaurant to be completed within 70 calendar days after submittal. Processing includes the submittal, review and final action, which may either be the issuance of a building permit or denial. The 70 days does not include the time before application submittal or construction / inspection process that follows issuance of a building permit.

### Challenges Opening and Sustaining a Restaurant

Restaurateurs report many challenges opening and maintaining a restaurant. Location constraints, marketing and promotion, hard and soft costs, and timing all contribute for many restaurants to a low profit margin. From a regulatory perspective, the time it takes to obtain permits and go through the inspection process can increase the initial start up costs. In addition to local regulations, restaurants are also regulated by the County Health Department and, when selling alcohol, the State Department of Alcoholic Beverage Control. The City does not have any authority or control over these outside entities. However, staff has begun a dialogue with the County to explore the possibility of taking on some of the health inspection or permitting procedures. At a minimum, the City could require items on plans that will be required by the County to help facilitate that process.

In Beverly Hills, one of the greatest regulatory challenges relates to parking. Restaurants tend to generate a greater demand for parking than other land uses and the existing built environment with its older buildings and limited on-site parking make it difficult or impossible to meet the parking requirements. Prior policy action by the City Council has allowed for certain sized restaurants, less than 1,000 square feet of dining and bar area, to be parked at the same ratio as a retail store, which is a significant benefit. Additionally, an in-lieu parking program in the Business Triangle is another option for restaurateurs looking to open in that location.

In addition to parking, the discretionary review process, whether at a staff level or before the PC and AC, introduces an unpredictable timeline. While the average timeline for each review authority is not excessive, these are averages. Accordingly, there are examples of some restaurants taking much longer to go through the review process.



Having a discretionary review component in the restaurant permitting process is the single greatest challenge in reducing that review to less than 70 days. For this reason, the recommendations in this report focus on the discretionary review components of the process.

#### Current Restaurant Application Process

There are generally three types of restaurant requests the city receives:

1. A change from one existing restaurant to another new restaurant
2. A change in use from a retail or office space to a new restaurant
3. A new restaurant associated with the construction of a new building

The first example generally requires less processing time and is the simplest to administer. While there may be changes to the internal floor plan, exterior modifications and new signs, most of these applications do not trigger any significant reviews other than AC review.

The second example requires greater staff time and may be more complicated from an applicant's perspective as tenant improvements for a kitchen, including grease traps, ventilation and other equipment, is not already in place. Additionally, provision for adequate parking must be analyzed, which can present challenges to an applicant if there is insufficient on-site parking.

The third example typically requires a more comprehensive review by both the PC and AC. Some of these projects may require environmental review and are typically associated with other land use proposals. For the purposes of this report, restaurants that fall into this category are not included. However, once the new building was constructed and a restaurant application filed, then, if the proposed amendments go forward, the applicant could expect to have the application acted upon within 70 days.

An application for a restaurant may require review by the PC, which typically takes 60 – 90 days to process. That review is followed by the AC and, if completed in two meetings, takes another 60 days (approximately). Each of those decisions is appealable to the City Council. Following the necessary reviews, an applicant may submit for plan check. Restaurant plan check times tend to vary based on complexity and range from two to six weeks for the first round of corrections. A typical plan check may have two or three rounds of corrections.

#### Staff Level Review

Restaurants are permitted by right in most commercial zones. When no discretionary applications are sought, staff can administratively process restaurant applications in less than 70 days. Staff has the authority to approve minor façade modifications and signs, and can approve up to six off-site parking spaces provided those spaces are located within 500 feet of the restaurant and a covenant is recorded on the property<sup>1</sup>. Most property owners, however, are unwilling to record such a covenant and the city does not receive many requests for off-site parking.

Staff has the authority to approve open air dining permits on public property and limited approval (no more than eight chairs) on private property when located within 170 feet of a residential zone.

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<sup>1</sup> BHMC Sections 10-3-2733 and 10-3-2734



Discretionary Review: Planning Commission

The PC is typically involved in restaurant reviews when requests are made for open air dining on private property, extended hours permits, or in lieu parking in the business triangle. The restaurant land use is permitted by right in most commercial areas and no public hearings are required to sell alcohol.

The PC has review authority for Open Air Dining Permits that include more than eight chairs when the restaurant is located within 170 feet of a residential zone. Extended Hours Permits are requested when a restaurateur wants to accept patrons after 10PM and the restaurant is located within 170 of residentially zoned property. Requests for in-lieu parking (only available in the Business Triangle) are also reviewed by the Planning Commission.

Discretionary Review: Architectural Commission

Applications for AC review typically involve requests to approve changes to the façade of the building, new signs and awnings, outdoor dining railings and furniture as well as landscaping.

Recommended Restaurant Streamlining Approach

To achieve a timelier review, staff recommends introducing more concurrent reviews, eliminating some discretionary requirements, eliminating some permits, and creating new application and public outreach material.

*In Lieu Parking*

As noted earlier, staff already has the administrative authority to approve a limited amount of off-site parking spaces. Evaluation of off-site parking is not substantively different than evaluating availability of parking spaces pursuant to the City's in-lieu parking program.

**Recommendation #1.** Authorize the Director of Community Development, or designee, the authority to grant up to 10 in-lieu parking spaces for new or expanded restaurants.

This has the effect of transferring PC authority to the Director for a small number of in-lieu parking spaces potentially eliminating 60 – 90 days of application processing and saving an applicant approximately \$11,600 in application fees. Requests for 11 or more spaces would continue to be evaluated by the PC at a public hearing.

*Open Air Dining*

The zoning code includes numerous standards to protect residential properties that are located within 170 feet of commercial uses. These are codified in the Transition Zone standards (Attachment 1). Notwithstanding these protections, open air dining still requires discretionary review when more than two tables or eight customers will be seated outdoors on private property. These properties remain subject to the hour restrictions set forth in the code and cannot accept new customers after 10PM. To accept customers after 10PM requires PC approval of an Extended Hours Permit. It is recommended that the PC remain the authority for Extended Hours Permits, but allow the Director to approve certain open air dining permits on private property.

**Recommendation #2.** Authorize the Director of Community Development to approve Open Air Dining Permits regardless of the number of tables and chairs requested. However, enable the Director to exercise discretion and forward to the Planning



Commission any Open Air Dining Permit on private property that may have the potential to adversely impact adjacent residential properties.

This has the effect of transferring PC authority to the Director for all Open Air Dining Permits, while providing the opportunity to send any case that may have an impact to the PC for review. It also has the potential to save an applicant 60 – 90 days of application processing and approximately \$15,000 in application fees.

#### *Architectural Review*

Most cases reviewed by the AC take two meetings. It is not possible to consistently review restaurant applications within 70 days and still maintain a discretionary review process that includes architectural review in its current forum. While an application for a building permit can be reviewed concurrent to architectural review, by the time the approval is granted, changes may be required on the building permit set of plans extending the review past 70 days.

To address this processing constraint, staff recommends the following:

- Recommendation #3. Authorize the Director of Community Development, or designee, the authority to approve or deny façade modifications, outdoor furniture, landscaping and signs for restaurant tenant spaces less than 25 feet in width.
- Recommendation #4. Authorize the Director of Community Development, or designee, the authority to approve temporary construction barricades regardless of graphic or sign representation.
- Recommendation #5. For projects with a tenant frontage greater than 25 feet, authorize the Director of Community Development, or designee the discretion to submit for a one-time courtesy review before the AC, plans for the proposed restaurant storefront. The ACs comments would be advisory and the matter would not be extended to a subsequent meeting.

To effectively implement this provision, it would be important to work with the AC to develop storefront guidelines that could be used by applicants and the Director, or designee, when reviewing the project. Additionally, it is anticipated that AC comments offered as a courtesy would be incorporated into the Director approval. Poor quality signs and outdoor dining furniture can cheapen the pedestrian experience. Accordingly, certain signs should be prohibited (signs on exposed raceways, for instance) and size limitations established. Guidelines on outdoor dining should also be established and reviewed by the AC. Presently, staff has the authority to approve signs of approximately 25 square feet as well as other minor façade alterations.

Implementing these changes would save an applicant approximately 60 days in application processing and approximately \$2,000.

#### *Administrative Changes*

There are other minor modifications that would be made to the zoning code based on direction received from the PC. These changes largely relate to the above recommendations and clarify recommended changes in review authority, including changes that would shift City Council review of certain Open Air



Dining Permits and requests for reduced parking to the Director and PC as appropriate. Further, current noticing requirements for outdoor dining would be eliminated when being processed administratively.

In addition to the code changes, staff anticipates preparing a restaurant application packet. This new application would facilitate concurrent processing of all applications. For instance, a restaurateur could submit for plan check, architectural review, encroachment permits (for open air dining), in-lieu parking and other components at the same time, instead of sequentially as is the case presently. Concurrent review alone, however, is insufficient to consistently achieve the 70 day review timeframe.

*Additional Options to Promote Restaurant Uses*

The following options are presented to the PC for its deliberation and possible recommendation to staff. The following are not recommendations as they do not relate specifically to improving application processing to the 70 day timeframe, but, if implemented, could make it easier for restaurateurs to open a business in the City. The options include:

1. Increase threshold for administratively approving off-site parking from 6 to 10 spaces as is being proposed for the in-lieu parking.
2. Eliminate the covenant provision for off-site parking and require a lease instead.
3. Extend the radius threshold for off-site parking from the current 500 feet to 1,000 feet.

*Note: Options 1 and 2 may have more practical benefit along the commercial corridors. Within the Business Triangle, restaurant operators can take advantage of the in-lieu parking provision. The lease provision can present challenges at an administrative level from a tracking perspective.*

4. Change the 1,000 square feet of restaurant dining and bar area limitation for a single property to be 1,000 square feet of restaurant and dining area *per restaurant space*. Present code permits only up to 1,000 square feet of dining and bar area on each property to take advantage of the reduced parking requirement (1 space per 350 square feet). Restricting each restaurant space to 1,000 square feet of dining and bar area, but allowing the cumulative dining and bar area to exceed 1,000 square feet per property could encourage more restaurants in the city and improve administrative recording keeping of these requests.
5. Allow restaurants with outdoor dining an opportunity to temporarily enclose that space (located on public property) due to inclement weather. Such enclosures would need to meet applicable life/safety codes, including fire protection, and meet certain aesthetic considerations.

Note: There are many restaurants that already have enclosures similar to that described in Option 5. However, most if not all of these enclosures have not been permitted.

6. Consider changes to the in-lieu parking program to establish a flat fee for restaurants (new restaurants and expansions to existing restaurants).



*Other Considerations*

Restaurants located on certain streets in the C5 zone require a conditional use permit. Because this specific requirement and the limited amount of anticipated restaurant activity in this area, staff recommends no restaurant-related changes for uses that require a conditional use permit.

Hotels throughout the City also have ancillary restaurant uses and are regulated by conditional use permits. Given the specific review already established for hotels, staff is not recommending any restaurant related changes to hotels, including nonconforming hotels in residential zones.

Finally, given the proximity to residential uses, no changes are recommended to the City's transition zone regulations. These standards include a number of protections for residents that have the potential for the greatest impact from commercial land uses, including restaurants. It is recommended that the public participation and public hearing reviews in this regard be retained notwithstanding the desire to streamline restaurant reviews.

**ENVIRONMENTAL ASSESSMENT**

This project has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City. The project qualifies for a Class 1 Categorical Exemption for operational changes within an existing commercial facility, and the project has been determined not to have a significant environmental impact and is exempt from the provisions of CEQA.

**PUBLIC OUTREACH AND NOTIFICATION**

Type of Notice	Required Period	Required Notice Date	Actual Notice Date	Actual Period
Newspaper Notice	10 Days	July 24, 2011	July 22, 2011	12

Public Comment

No public comments were received at the time this report was prepared.

**NEXT STEPS**

It is anticipated that the subject hearing will be continued to September 8, 2011 and the Planning Commission will act on a resolution forwarding a recommendation to the City Council of certain amendments to streamline restaurant review procedures. A City Council public hearing is anticipated in October 2011.

Report Reviewed By:

  
Jonathan Lait, AICP, City Planner



TO: Planning Commission

FROM: Allen Rennett, Z. Richard Rubins and James Blakely, on behalf of the Architectural Commission

Dated: August 4, 2011

SUBJECT: Streamlining Restaurant Review Procedures

The Architectural Commission was informed at its July meeting that this matter would be on the Planning Commission agenda today, but that the Staff report and recommendations would not come out until too late for the Architectural Commission as a whole to review and respond. A subcommittee consisting of Commissioners Allen Rennett, Z. Richard Rubins and James Blakely was charged with reviewing the recommendations and commenting on them.

The Architectural Commission is well aware of the City's need for a vibrant business community and extremely sensitive to the importance of getting projects through the approval process as quickly as possible, consistent with its responsibility to make sure that the projects meet City standards. Thus, we welcome the opportunity to reexamine the process in order to increase efficiency.

As noted in the Staff Report, simple applications can be processed within a 70 day period already. More complex projects necessarily take longer because the City has decided that other interests, such as those of nearby homeowners, need to be considered, and that consideration takes time.

Most of the discretionary matters come before the Planning Commission, not the Architectural Commission. For example, numbered Recommendations 1 and 2 of the Staff Report, dealing with parking and outdoor dining, are Planning Commission matters that are not within our purview.

The other three numbered recommendations affect the Architectural Commission.

Recommendation 3 would exempt restaurants less than 25 feet in width from Architectural Commission review. This recommendation unwisely focuses on the size of the project rather than its impact. Small facades that do not fit with their surroundings or that otherwise do not meet Beverly Hills standards can have adverse effects that are larger than the size of the project itself. In fact, under current procedures simple changes are already handled solely by Staff, regardless of the size of the project. More extensive changes should continue to be reviewed by the Architectural Commission.

Recommendation 4 would exempt temporary construction barricades from architectural review. Construction barricades come before the Commission only if they involve graphics beyond the standard text permitted by Code. We've seen many creative construction barricades for high-end retail stores, but none of us can recall a restaurant wanting to invest in a fancy construction barricade. So, in practice, exempting them is not going to save restaurants a lot of

time. Given that construction barricades are usually approved at the first meeting where they are presented, and that construction barricades for restaurants come up so rarely, any such barricade might as well come before the Architectural Commission to assure that it is consistent with other approvals.

Recommendation 5 would essentially exempt all restaurants from review by the Architectural Commission, requiring larger restaurants only to an advisory appearance before the Commission. This recommendation is a significant and needless reduction of the historical role of the Architectural Commission, arbitrarily eliminating architectural review for one type of business. Restaurants may take longer than other businesses to get all of their permits, but there is no reason to believe that architectural review is the reason, nor is there any reason to believe that architectural review is any less necessary for restaurants than for other businesses.

We believe that there some other procedural reforms that can better achieve the dual goals of maintaining architectural integrity while processing restaurant applications expeditiously. Among them:

1. Staff should work more closely with applicants to assure that applications are complete and in a condition ready to be approved. Staff already knows what the Architectural Commission is looking for and what the Architectural Commission will normally approve. The biggest reason that applications are not approved the first time is that the plans are inadequate or even in an incomplete state for the Commissioners to understand exactly what is being proposed. Staff must possess and exercise the authority to keep projects off the Commission agenda until the applications are fully ready for Commission consideration. Submitting projects with little or no chance of being approved only proven to delay the approval process.

Similarly, Staff should be more aggressive in making sure that returning applicants have addressed all the issues raised in the first hearing. Multiple hearings are most often needed because of the failure to deal with the issues raised in the first meeting, either because the applicant or architect makes a strategic decision not to make the necessary revisions or because the architect is not sufficiently competent. Stronger Staff management of the traffic flow can expediate rather than delay a final approval.

2. Any project that anticipates possible problems in getting approval should be encouraged to have the Architectural Commission “preview” the project - a truly advisory review - even before an application is filed. Major projects often seek advisory review and both the Architectural Commission and the applicants have found these sessions very helpful. It is unlikely that a restaurant would seek advisory review unless the proposed design is highly unusual or radical, but the opportunity should always be available.

3. An alternative form of pre-review would be to offer a pre-review with a committee of the Architectural Commission. The Chair could be given the authority to appoint such a committee upon request without the need for a meeting of the full commission.

4. The Commission should be encouraged to continue its existing practice of approving projects that are largely acceptable, subject to conditions that specified details be

further reviewed by Staff or by a subcommittee, rather than coming back to the full Commission for another hearing.

We support the unnumbered recommendations of the Staff Report to attempt to process necessary approvals in parallel rather than sequentially whenever possible. We believe that a significant part of any concern about the role of the Architectural Commission in delaying restaurants arises from the fact that we don't even enter the picture until late in the process. (Getting the Architectural Commission involved earlier might even have the side benefit of permitting Architectural Commission input to the Planning Commission.)

Some Planning Commission issues, such as parking, do not involve the physical structure. If those Planning Commission approvals that affect the physical structure can be processed first, the project can go to the Architectural Commission sooner, while the Planning Commission is dealing with the approvals that necessarily take longer.

Because the Architectural Commission deals with the outside of the restaurant, while the most difficult and time-consuming construction issues typically involve the kitchen, another suggestion for parallel processing would be to allow interior approvals to move ahead independently of Architectural Commission approval. Although most exterior changes do not require extensive interior changes, sometimes they do necessitate unexpected interior changes. Applicants should be advised of this risk, but if the applicant is willing to assume the risk in order to accelerate the approval process, the applicant should have that option.

We believe that the 70 day period for processing restaurant approvals should be a goal but not a rigid standard. It should certainly be possible for simple projects and well-designed projects to be processed in 70 days or less. More complex restaurant projects may take longer, but the City should constantly be re-examining its processes to help those projects get through in as short a time as possible.

Regardless of what procedures the City adopts, however, it is essential that the applicants do their part to move projects along. They need to recognize that good architects will not only produce better projects, but will produce more complete plans that go through the approval process significantly more quickly than plans prepared by less competent architects who may nominally be less expensive. They also need to recognize that Staff knows what needs to be done to get projects approved, and that it is rarely if ever to the applicant's advantage to try to circumvent or avoid Staff suggestions.

If the Planning Commission would like additional, less hurried, input, we would be happy to respond to questions or to participate in a joint meeting.



## Personal Remarks from Zale Richard Rubins

These are my own personal remarks and may or may not necessarily represent those of the Architectural Commission.

Like a lot of things that happen in the City they start out with the good intentions of making things better but have the unintended consequences of not being thought through as clearly as is necessary because of the haste to implement the change. Sometimes, the ramifications of those good intentions do not play out well in reality. It took years for the problems we are being asked to review to develop. An extra month or two (if need be) to fully involve all the necessary parties and get their input can only prove to be a long-range benefit to the city and its residents.

The Architectural Commission's sub-committee's letter goes a long way to further your understanding for the need of the Architectural Commission to always be the final decider of any decisions necessary in creating the visual fabric for our community.

To simply hand these responsibilities and decisions over to staff is an accident waiting to happen on a monthly basis. You should not allow decisions to be made by good and well-intentioned people who are not properly trained for the job of visualization and taste. It is too much to ask for and too much to expect of staff. This is the Architectural Commission's mandate. The Architectural Commission is a Commission of professionals and community members who are vested in the success not only of their work but of their community as well.

All that being said it is my opinion that the processes need to be structured in such a way as to have the Architectural Commission be one of the first to see a project (Preview). Either as a sub committee who reviews a project before it is presented to the full commission or as a full commission vetting a project before it goes to the planning commission.

A proper firewall should be created where Staff properly and fully vets (punch list of requirements) all the applicants BEFORE submitting a project to the Commission. This act alone will clear up more than half the problems that occur before our Commission where an applicant does not present their information correctly. This presently can cause a 30 day delay or more depending on the ability of the applicant to conform to the requests made by the Commission once their application is finally heard. Staff must also be more overt in ensuring that the "punch list" is adhered to when submissions are made. And the applicant must be made fully aware that not complying to those requirements is cause for the project to be further delayed.

If the Commission creates a standing sub-committee that meets 15 days after the initial full Commission meeting it will cut the processing time of an applicant through the Architectural Commission by 15 days.

This sub-committee could be empowered by the commission to give full acceptance to a project or simply reject it until the next full Commission meeting if the applicant proves to be unwilling or incapable to make the full Commission's previously requested changes. Or to take it even further the commission could simply meet twice a month.

Another option, depending on the workload at hand is to call a special meeting 15 days after the 1<sup>st</sup> hearing by the Commission so that the full commission can review a particularly onerous project.

There are many other thoughts and permutations to explore. But, I think it is extremely important to control the time line where the Architectural Commission initially sees the project. If you let it be too far down that time line you preclude the Architectural Commission's ability to act reasonably and responsibly.

In the end, if staff does not prepare the applicant properly it won't matter when we see the applicant. We can only do so much time-wise to bring an applicant, who is ill prepared or simply incapable of meeting the community's standards through the system faster. That has to be recognized and dealt with irrespective of any desired 70 day timeframe. I think 70 days should be and is a very worthy goal. Reality and its vagaries does not necessarily allow it to be set in concrete.

Once the proper solution is made for this issue it is safe to assume that much of its implementation may be applied to all projects brought before our Commission. Resulting in a responsible and timely speedup in the processing of all applications before the Architectural Commission.

I am personally available to meet with anyone who wishes to solicit my help in working towards a mutually beneficial solution to this issue. Please do not hesitate to ask.

Richard Rubins

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