



October 16, 2025

City of Orange
Planning Division
300 E. Chapman Ave.
Orange, CA 92866

RE: PROJECT JUSTIFICATION / DESCRIPTION (2375 N Tustin St – Orange) - “Halston” - A General Plan Amendment, Zone Change, Major Site Plan Review, Design Review and a Vesting Tentative Tract Map (VTTM 19392)

The Project proposes to demolish all on site improvements and construct 71 new paired and detached small lot homes (58 paired duplex homes and 13 detached homes) on the 4.235-acre Project site (Parcel 1 of LLA 2025-01), including a recreation area, common paseo open space areas, and guest parking. To accommodate this proposal, a General Plan Amendment and Zone Change are requested. The General Plan Amendment would change the land use designation from General Commercial (GC) to Medium Density Residential (MDR). The Zone Change would change the zoning classification from – C-TR - Limited Business Tustin Redevelopment Project Area to Multiple-Family Residential (R-3) with application of Small Lot Subdivision Development Standards (OMC 17.14.270) for fee simple duplex and detached residences. Additionally, the project includes Major Site Plan Review, Design Review and a Vesting Tentative Tract Map (VTTM 19392).

The proposed community would have a density of 16.7 dwelling units per acre (du/ac), consistent with the Medium Density Residential Zone, which provides for densities of 15.1 to 24.0 dwelling unit per acre.

The preliminary unit mix incorporates five (5) different floor plans and will offer three (3) and four (4)-bedroom homes ranging from approximately 2,008 to 2,117 square feet. All homes will be on fee simple lots in either detached SFD or duplex SFD buildings; and each are designed as 3-story homes. The five (5) floor plans are lot specific depending on location within the proposed community. There are simple variations in the Plan 3 (A, B, and C) that specify whether it is detached without a roof deck (3A), detached with a roof deck (3B), or attached in duplex building type with a roof deck (3C). Plan 5 A & B variations distinguish between attached in a duplex building type (5A), or a detached SFD building (Plan 5B). Plan 5 does not offer a roof deck in either variation. Only the proposed project interior lots and proposed Plan 1, Plans 3B & 3C and Plan 4 offer private open space roof decks within the project site (Lots 21-53, and 69-71). These are in Building Types Duplex A, Duplex C and SFD Plan 3B. The exterior perimeter lots (lots 1-20 and 54-68) include proposed Plan types 2, 3A & 5, and do not include roof decks, because they are adjacent to existing R-3 zoned residential properties, and will have private open space on ground level as private rear yard spaces that are minimum 10 feet depth. These homes are identified as Building Types Duplex B and SFD Plan 3A and SFD Plan 5B. All proposed dwellings are a maximum height of 35 feet and 3 stories.

Along the eastern property boundary is Highway 55 with an existing high masonry wall, and to the south are adjacent existing mobile homes and attached MF dwellings, and MF units on the north. The west frontage is commercial uses and the access driveway to the N. Tustin St. signalized intersection. The Project proposes (71) total single-family homes; 58 within single family duplex buildings and 13 detached SFD buildings, all are three-story homes.

Table 1 and 2 below summarize the proposed Building Type and Floor Plans proposed:

Table 1. Building Types

Building Type	Floor Plan(s)	# of Buildings	# of Units	Square Footage	Stories	Garage Count	Bedrooms in each home type	Roof Deck Open Space
Duplex Building Type A	Plans 1 & 4	10	20	Plan 1 – 2,008 SF Plan 4 – 2,086 SF	3-Story	20 two-car garages	3 Bedrooms 3 Bedrooms	Plan 1 – 300 SF Plan 4 – 235 SF
Duplex Building Type B	Plans 2 & 5A	16	32	Plan 2 – 2,014 SF Plan 5A – 2,117 SF	3-Story	32 two-car garages	3 Bedrooms 3 Bedrooms	NA – no Roof Deck NA – no Roof Deck
Duplex Building Type C	Plans 3C & 4	3	6	Plan 3C – 2,026 SF Plan 4 – 2,086 SF	3-Story	6 two-car garages	4 Bedrooms 3 Bedrooms	Plan 3C – 269 SF Plan 4 – 235 SF
Detached SFD	Plan 3A	1	1	2,026 SF	3-Story	1 two-car garages	4 Bedrooms	NA – no Roof Deck
Detached SFD	Plan 3B	10	10	2,026 SF	3-Story	10 two-car garages	4 Bedrooms	Plan 3B – 269 SF
Detached SFD	Plan 5B	2	2	2,117 SF	3-Story	2 two-car garages	3 Bedrooms	NA – no Roof Deck

Table 2. Floor Plan Summary

The baseline individual home Floor Plan information is as follows:

Plan	# of Plans in Project	Square Footage	Stories	Garage Count	Bedrooms	Private Open Space	Garage Storage
Plan 1	10	2,008 SF	3- Story	Two-car garage 472 SF	3 Bedrooms	300 SF Private Roof Deck	120 Cu Ft Shelving
Plan 2	16	2,014 SF	3- Story	Two-car garage 446 SF	3 Bedrooms	Private Yards (approx. 250 SF typical)	120 Cu Ft overhead racks
Plan 3A	1	2,026 SF	3- Story	Two-car garage 477 SF	4 Bedrooms	Private Yard (approx. 250 SF typical)	120 Cu Ft Shelving
Plan 3B	10	2,026 SF	3- Story	Two-car garage 477 SF	4 Bedrooms	269 SF Private Roof Deck	120 Cu Ft Shelving
Plan 3C	3	2,026 SF	3- Story	Two-car garage 477 SF	4 Bedrooms	269 SF Private Roof Deck	120 Cu Ft Shelving
Plan 4	13	2,086 SF	3- Story	Two-car garage 473 SF	3 Bedrooms	235 SF Private Roof Deck	120 Cu Ft Shelving
Plan 5 A & 5B	18	2,117 SF	3- Story	Two-car garage 446 SF	3 Bedrooms	Private Yard (approx. 250 SF typical)	120 Cu Ft overhead racks

Homes along the east (rear) property boundary line have a 10-foot setback or greater consistent with the Small Lot Subdivision Development Standards. Homes along north and south boundaries provide a minimum 10-foot setback, where a minimum 5 feet is permitted, to allow for private ground level private open space yards. Five homes (Lots 1-5) present rear articulated elevations and rear private yard areas adjacent to a commercial parcel being developed as a future bank and beyond is N. Tustin Street. The Project includes a front (West) setback greater than 15 feet from the new property line created by the future Bank parcel (Parcel 2 of LLA 2025-01) and another commercial building between the Project area and N. Tustin Street consistent with the Small Lot Subdivision Development Standards.

Each dwelling unit is designed with a private side-by-side two car garage. No individual driveway parking in front of garages or in the private street is proposed. There will be *142 private garage spaces* and *23 uncovered open guest parking spaces*. In addition, consistent with Small Lot Subdivision Ordinance, there are 14 uncovered “on-lot” dedicated spaces to each of the fourteen Plan 3 (3A, 3B, & 3C) 4-bedroom homes proposed. The site plan provides a total of 179 parking spaces, which represents a parking ratio of 2.52 spaces per residential unit overall. Table 17.34.060(A) REQUIRED NUMBER OF PARKING SPACES FOR RESIDENTIAL USES requires 174 parking spaces for Small Lot Subdivision, 142 private garage spaces, 14 dedicated “on-lot” open stalls for the Plan 3 homes, and 18 open guest stalls required. The proposed project exceeds the minimum parking requirements by 5 spaces. Not included in any of the summary parking spaces is one (1) additional open parking space dedicated to US Postal Service use.

Vehicle access would occur at a shared entry from N. Tustin Street, in the same location as the existing commercial driveway access aisle. This is a signalized intersection at the drive entry and N. Tustin Street. The Project is not proposed to be gated. The Project access point will be 29-foot wide accessway with decorative paving at the entry portal transitioning to a 25-foot-wide circulation drive aisle circulating through the proposed community. The interior loop drive aisle measures 25-feet in width, with Fire access corner radii of 50’ outside radius and 55’ inside radius compliant with Fire Master Plan access standards.

Secondary EVA access is required by OCFD and has been integrated into proposed project circulation design at the northeast corner of the property through fire approved hammerhead and turning radii. The EVA is proposed to connect through a small portion of the adjacent property to an existing 22’ wide dedicated irrevocable easement for the right of access for the purpose of Police, Fire, Safety and Health protection and General welfare. The easement is prescribed on the adjacent recorded Tract 10237. OCFD agreed that full documentation of a connecting easement grant from the adjoining HOA will be required prior to any grading permit for the project, if and when the project is approved.

The project is subject to Small Lot Subdivision Guidelines which are intended to be used to support the implementation of the small lot subdivision ordinance. The stated purpose of the guidelines is intended to convey fundamental expectations the City has for the development of small lot subdivisions. The document offers guidance to promote context-sensitive small lot subdivision development and is adopted by *resolution*. The Guidelines serve as guidelines and elements of the guidelines are not development standards as adopted in the Small Lot Subdivision Ordinance Sec. 17.14.270 Small Lot Subdivision Development Standards.

The building elevations introduce contemporary highly articulated exterior designs utilizing a cohesive mix of stucco, siding materials, and colors, with variations of architectural siding elements on various building types. Each building type and plan share elements including metal railings, decorative metal awnings, articulation along building facades and roof variations consistent with contemporary architecture mixed with some traditional elements.

Consistent with the Small Lot Subdivision Guidelines, each home primary entrance doorway faces the drive aisle or landscape paseo passage. All are connected by walkways to the interior common landscape and recreation area and ultimately connecting out to N. Tustin Street via sidewalk. All homes entries are covered by an entry porch or shallow alcove that accentuates the point of arrival and entry.

Each home is provided *greater than 150 SF* of private open space either on the ground in a private enclosed rear yard or by a private roof deck for those lots on the interior of the project and that are not adjacent to existing residential units. Private open space for every proposed home is provided that exceeds the minimum 150 SF area required. There is approximately 10,360 SF total of ground private yard open space provided in lots 1-20 & 54-68, an overall average of approx. 296 SF each with a minimum of 240 SF each. Lots 21-53, & 69-71, the internal lots provide private open space in roof deck area that total approximately 9,552 SF; with the minimum individual 235 SF roof deck for applicable lots. Further, an additional approximate 6,031 SF Common Open space areas are provided for use and enjoyment by all homes for additional 85 SF per unit average as common area that meet minimum dimension requirements and within a project common lot. The common open space includes a Central community open space area with enhanced paving courtyard, palm trees, shade sail overhead covers, seating tables, and artificial turf for small social events, group gatherings and multipurpose open play and resident use. Landscape open space and walkways are proposed throughout the internal walks in the paseo areas. The common open space areas would be owned and maintained by a newly formed homeowner's association.

Sewer, domestic water, and storm drainage for the Project would be served from existing public services located in both N. Tustin Street for the water and sewer from the existing trunk line within an easement off-site immediately north of the site, which is the same sewer line that the existing Best Buy is connected to. The domestic water main along the Project frontage of N. Tustin Street will provide water service thru a master meter and backflow into a private domestic water distribution to each lot and landscape irrigation with each home utilizing submeters that will be managed by the future HOA. Dry utility service would be accessed from available existing electrical, CATV and telephone providers currently serving the site and area. There are not any on-site existing above-ground electrical lines. The existing sidewalks, street trees, and an existing bus stop along the Project site frontage would also remain and not be modified.

Existing block wall fencing will remain along the north and south property boundaries and range between 6-8+ feet tall. A new block wall is proposed along the Eastern project boundary between the site and existing separate parcel occupied with a billboard that is under separate ownership. The project is required to provide vehicular access to the adjacent east billboard use parcel by an existing easement on the property from our site and is included on the proposed map and proposed slide gate along the east project boundary. The east masonry wall will measure 8 feet in height. A new 8-foot-high screen wall is also proposed at the west project frontage between the existing adjacent commercial office building and the new bank parcel directly west in the frontage.

Solid Waste storage will occur with individual carts stored within the enclosed garages of each dwelling unit outside of the interior clear spaces required for garage parking. On trash days, the service carts will be placed curbside, outside of fire turn radii areas. A solid waste management plan is included for this project in the landscape set of plans.

Construction of the Project would begin with demolition of the existing building, site improvements, and parking areas within the parcel. All materials would be hauled off site and to the extent possible taken to a recycling facility.

The Project site would be graded, which includes the removal and recompaction of the upper five feet depending on the underlying soil conditions. Grading will occur in a single phase and include approximately

8200 CY of cut with approximately 850 Cy of fill, and a preliminary export volume of approximately 7,350 cubic yards.

Stormwater Runoff will be captured by five (5) sump curb inlet catch basins, one (1) proposed grate inlet and an onsite area drain system. Runoff will be routed into proposed Biofiltration Vault treatment devices prior to discharge to the existing stormwater sump pump system. The sump pump system will discharge runoff into N. Tustin Street through a parkway drain, consistent with the current condition, but with an approximate 7% decreased volume from existing condition.

We respectfully request your review and approval of the proposed request.



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Attachement: Small Lot Subdivision Development Standards Table

**Small Lot Subdivision Development Standards
R-3 Zoning District
(OMC Section 17.14.270)**

	Required/Permitted	Proposed	Code Sections
Maximum Permitted Density	15.1 – 24 dwelling units per	16.76 du/ac	§ 17.14.270.
Dwelling Units per Subdivided Lot	One (1)	One (1)	§ 17.14.270.
Lot Area	n/a	Varies – 1,515 SF (Lot 36) to 3,376 SF (Lot 38)	§ 17.14.270.
Lot Frontage	25 feet	25.02 – 52.54 feet	§ 17.14.270.
Lot Depth	50 feet	55.58 – 68.03 feet	§ 17.14.270.
Perimeter Setback: Front (Tustin Street)	15 feet	15.1 feet	§ 17.14.270.
Perimeter Setback: Interior Side (North Property Line)	5 feet	10.0 feet	§ 17.14.270.
Perimeter Setback: Side (South Property Line)	5 feet	10.1 feet	§ 17.14.270.
Perimeter Setback: Rear (East Property Line)	10 feet	10.1 feet	§ 17.14.270.
Interior Setbacks	No front, side, or rear yard is required between interior lot lines created within an approved small lot subdivision.	7 feet minimum between buildings	§ 17.14.270.
Building Height	35 feet or 3 stories	35.0 Feet - 3-stories	§ 17.14.270.
Lot Coverage	75 percent of approved small lot	Varies – 25 - 55.7 percent	§ 17.14.270.
Private Open Space	150 square feet per dwelling unit	235 – 240 square feet per unit PRIVATE YARD AREA - 10,360 S.F. PROVIDED (UNITS 1-20, 54-68) (240 S.F. MIN., 10'X24') PRIVATE ROOF DECK AREA - 9,552 S.F. PROVIDED (UNITS 21-53, 69-71) 235 S.F. MIN., 13'3" X 18'8" TOTAL PRIVATE OPEN SPACE 19,912 S.F. (280 square feet average/UNIT)	§ 17.14.270.
Common Open Space	Only required when lot coverage of each lot exceeds 75 percent.	Each lot DOES NOT exceed 75 percent lot coverage; however, 6,031 square feet of common open space is provided in the form of a central courtyard with shade sail overhead covers, picnic table seating, and open turf area.	§ 17.14.270.C.3(f)
Fence height (maximum)	3 feet, 6 inches: Front yard setback areas along the perimeter of the proposed subdivision. 6 feet: Side and rear yard setback areas along the perimeter of the proposed subdivision.	New 6-foot perimeter wall adjacent to commercial development to the west Existing 6 – 7.5 foot north and south side perimeter walls to remain.	§ 17.14.270, 17.12.070.B.1.c

	8 feet: When adjacent to commercial development.	Existing 8-foot perimeter wall along the west property line; and New 8-foot perimeter wall along the East (rear) property line, both adjacent to commercial development.	
<i>Landscaping</i>	Setbacks and open areas of the site not occupied by buildings shall be landscaped, including surface parking lot areas.	51,464 square feet of landscaping / hardscaping provided.	§ 16.50, 17.14.270.C.9
<i>Secured Storage</i>	120 cubic feet / unit Must be in addition to cabinets and closets typically found within a unit (such as kitchen and bathroom cabinets, clothes, and linen closets)	120 cubic feet per unit provided in either designated areas for shelves or overhead storage in garages.	§ 17.14.140
<i>Parking</i>	174 Spaces Required 2 parking spaces per unit, either enclosed or covered (i.e., garage or carport). For units with 4 or more bedrooms, 1 additional space shall be provided on each lot which may be enclosed or unenclosed. Enclosed or covered parking may be provided in a tandem format, except for guest parking in common parking areas. A minimum of 0.25 spaces per unit (with a minimum of 2 guest spaces) shall be provided as easily accessible and distinguishable guest parking in addition to the required parking for each unit. Guest parking may be unenclosed. 3 Bed: 114 4 Bed: 42 Guest: 18 Total Required: 174	179 total spaces are provided, plus one dedicated USPS space. 142 enclosed garages spaces (71 units) 14 unenclosed on-lot resident spaces (14 four-bedroom units) 23 unenclosed guest spaces (5 surplus)	§ 17.14.270.C.8, 17.34.060 (A)
<i>Trash Enclosures</i>	A small lot subdivision shall provide trash (including trash, recycling, and green waste) collection areas screened from public view.	Three (3) Individual 35 gallon (25" x 18" carts in each garage outside of required garage parking dimensions.	§ 17.14.270.C.11