

July 19, 2021  
Planning Commission Meeting  
Public Comment

# Public Comments

## Item 7.1

### Public Hearing:

An ordinance amending procedures for  
noticing and posting requirements

To: Orange Planning Commission  
From: Adrienne Gladson, AICP  
Date: July 18, 2021  
RE: Comments on amending procedures for noticing & posting requirements - 7.1

- 1) All public noticing should be done in English and Spanish as routine practice. People that require special accommodation for other languages and communication needs should see a footnote within this code section on how to receive such assistance.
- 2) Conditional Use Permits - maintain the current practice of placing an ad in the newspaper. Posting on the site should also continue along with a notice mailed to all property owners within the 500-foot notification radius in line with conflicts of interest provisions.
- 3) Establish a robust notification system through the city's website for all the projects on the noticing table. In the digital age it makes this information very easy to find. The city website is the key notifier of everything & fairness and transparency of what is happening must be paramount. Staff should also determine, with Council direction, when a project requires early notice on the city's other digital platforms and social media. Staff can craft that framework, but at a minimum, all projects initiated by the city, (CIP, NTSP, Zoning Code Amendments, Housing Element update, GP update, etc.) County, and State must be announced every time on those platforms to encourage the public to participate.
- 4) Tentative Parcel Maps\* - TPM should shift to (or remain with) the Planning Commission as the reviewing body not the Director. The Commission (or the Council) should always be the final reviewing body when land is divided. The project should be published, posted, and notice mailed to property owners within the required 500-foot radius.
- 5) Consider including provisions to establish some type of notification for group homes, sober living homes, reasonable accommodation, and short-term rentals, to include, at a minimum, the adjacent property owner touching the subject property. Notice in the newspaper for these could be waived if a robust noticing system is provided on the city website.
- 6) Support staff's posting procedures covered in Attachment 4. I have observed that the current site postings stand up well and often stay up long after the public hearing. I suggest that a separate, second sign (like the size of a residential or commercial property for sale sign), printed in color, be posted on sites when a project includes a CEQA clearance document. This sign should include all the required CEQA details and notice on the CEQA review period in a large font, etc. The sign shall be posted

on the subject site in the most accessible area for public viewing on or before the date the draft CEQA review document is released for public review.<sup>1</sup>

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- Noticing changes are connected to the Small Lot Subdivision Ordinance. PC could consider the two issues together as they interrelate.

# Public Comments

## Item 7.2

### Public Hearing:

Comprehensive Citywide Parking Code  
Update and Related Administrative  
Revisions

**To: Orange Planning Commission**

**From: Adrienne Gladson, AICP**

**Date: July 18, 2021**

**RE: Comments on Off-Street parking code amendment - Item 7.2**

- 1) The Commission has a heavy charge tonight. Your work on this matter requires detailed study with public a workshop so we can have more than 3 minutes to speak with you. It also deserves more than one meeting to do it justice. The public is watching, and their interest must be delivered. These are the meetings I enjoy listening to. I will learn a lot through your questions and the reasoning used in any decision made tonight.
  
- 2) Some of the questions I would ask if I was on the dais with you:
  - What are we fixing?
  - Is this process fair to all involved?
  - What projects are driving this?
  - Will reducing the required parking for non-residential uses (specifically food uses) harm Downtown's historic status as well as our Great Place designation?
  - What are is impacts to the NTSP, area various mixed-use zones, and the commercial corridors along Tustin, Chapman, Main, Glassell, Katella, etc.?
  - Why did the community only get 72 hours to review this code amendment along with the two others? Couldn't a better choice be made to give the community time to review this? Wouldn't it be wise to hold a series of workshops on it as per city GP policy and the consultants contract?
  - Are all sides of this matter being heard and considered?
  - What does the timing of this action mean in relationship to Council's decision last week to close the paseo the end of August and reopen it again the end of September?

A decision on this matter will have short and long-term consequences and your names will be on it. Let's do this right.

- 3) Ask staff for specifics. Have staff cite examples where the existing parking code was an issue for project they reviewed. Why did we apply for the SB-2 monies to pay for it? Are we at risk of an audit if this process isn't done correctly and with transparency?
  
- 4) Parking drives development. If the project doesn't have the required parking the project must be modified. Who can you put a size 10 foot in an 8 shoe? Sometimes the answer is "no" until the project is modified. I am not opposed to refining the parking code for Orange but let's make sure we do this correctly.

5) The draft code language proposes a new tiered parking rate for food uses. I think the new restaurant and food rates are confusing. The Commission needs them fully explained with on the ground examples. I am not comfortable they will work. We all can see the challenges for projects like Caines, McDonalds, In& Out, Chick-fil-A, and others. I also find it appropriate when a shopping center has more than 30% of the center dedicated to food uses the Commission should review it through a CUP. I think a higher rate should be used for those locations. Also, the new rate for drive-thrus need careful attention. Nearly all our drive thrus had existing parking and circulation issues before Covid-19. You've all had first-hand experience with being asked to approve projects you didn't feel comfortable with because the parking wasn't enough, and vehicle access and on-site circulation were left to the operator. Very problematic.

6) Covid-19 has clearly changed the parking demand related to the commercial and retail world for sure. Parking demands at big box and grocery stores is higher now, and drive-throughs were very busy before Covid-19. Now they are worse. The future of AI and driving less will happen at some point, but we aren't there now. I enjoy walking to places, but I am not going to walk to and from Taco Mesa at night, in the rain, nor do I want to pay for ride service for such a short distance. People overwhelming still prefer to drive and own a car. Further, on the east side of town (as well as other areas), older commercial centers already have battles for parking because drive-through queuing snakes through the parking lot. I believe we shouldn't be reckless in moving forward with any lower parking rates that will push parking (customer and employees) into adjacent commercial properties or into surrounding neighborhoods. Let's sunshine this matter and take the time necessary to do this right.

# Public Comments

## Item 7.3

### Public Hearing:

An ordinance amending Titles 16 and 17 of the Orange Municipal Code to Establish Development Standards and Streamlined Subdivision and Entitlement Procedures for Small Lot Subdivisions in Multi-family Residential Zones



**To: Orange Planning Commission**

**From: Adrienne Gladson, AICP**

**Date: July 18, 2021**

**RE: Comments on the Small Lot Subdivision (SLS) Ordinance - Item 7.3**

- 1) The Commission should start your work tonight learning every aspect and element of what this code amendment will do. The main question that requires a straight answer is what are we fixing? What's not working in our R-3 and R-4 zoned areas that we need to see the redevelopment of those existing apartments and housing stock? Some of those property owners could oppose this. It's best to carefully review this and all its consequences because your name will be part of it. My sense if you may choose to continue this until those answers and alternatives can be given and considered before action taken. This may or may not be the direction the community wants this to go.
- 2) This is a unique residential housing development concept. It has been successful and a failure. I am familiar with two OC cities that use this tool: Costa Mesa and Brea. Costa Mesa adopted it to increase home ownership citywide. Costa Mesa wanted more housing privately owned and less rentals. Orange doesn't have that problem. This could harm those multi-family property owners that don't want the pressure to sell to residential developers, rather they want to keep their apartment inventory.

I strongly recommend the Commission, along with the City Council, if they desire to join you, take a field trip to Costa Mesa and Brea to see first-hand what these projects look like after they are built. Staff may know of other cities to visit as well. I would be pleased to join such field trips.

- 3) One of the key reasons why residential developers like this Ordinance is that it takes away the minimum lot size requirement. For our draft SLS ordinance, there is no minimum lot size. It can be as small as the developer wants once all development standards are met. SLS have very small lots with compact setbacks and limited open space.
- 4) I recommend the Commission change the reviewing body to the Planning Commission for SLS, not the Community Director. This needs your oversight.
- 5) I strongly recommend a detailed inventory and map of where R-3 and R-4 zoning areas are in Orange. This data must be made available to the Commission to better understand the context of these existing neighborhoods and those impacted before any recommendation to approve or deny this is done. Are there property tax impacts for those existing property owners?

- 6) I recommend after comment 5 is done, staff, along with De Novo, evaluate where overlay zones on certain R-3 and R-4 areas be also considered along with this SLS action. It may be necessary to establish an overlay zone with applicable development standards for these established Orange neighborhoods to make sure these more compact and intense residential developments fit in. A one-story overlay or a design theme may prove necessary in some areas.
  
- 7) The Commission knows the need for affordable housing in Orange. SLS can play a role in that effort. The Commission should explore what that role should be for SLS and recommend them to the Council.