



Attachment 15

**BUILDING INDUSTRY OF SOUTHERN CALIFORNIA,
ORANGE COUNTY CHAPTER**

May 6, 2026

Mayor Dan Slater
City of Orange
300 E. Chapman Avenue
Orange, CA 92866

RE: Support of Housing in the City of Orange – 2375 N. Tustin Street

Dear Mayor Slater, Mayor Pro Tem Bilodeau, and Members of the Council,

On behalf of the Orange County Chapter of the Building Industry Association of Southern California (BIAOC), representing thousands of home builders, trade partners, and suppliers throughout the region, we write to express our strong support for additional housing in the City of Orange – specifically the proposed project at 2375 N. Tustin Street.

The application before you is an important step toward addressing the City's housing needs by helping combat the ongoing housing shortage and providing much-needed homes for the community. This thoughtfully designed project would deliver 71 paired and detached residences, open space, recreation, and parking on an underutilized commercial site, advancing the City of Orange's long-term housing goals while making efficient and responsible use of land.

This location is the perfect example of redevelopment and revitalization of neighborhoods by replacing aging commercial infrastructure with much needed housing. The proposed development reflects a context-sensitive approach to housing delivery that is compatible with surrounding neighborhoods. Each residential unit would have three or four bedrooms, ranging in size from approximately 2,008 square feet to 2,117 square feet and would be developed above two-car garages. The 71 residences on the 4.235-acre site would result in a density of 16.76 units per acre. The Project would include parking, open space, ornamental landscaping, and incorporates high-quality architecture to compliment the area.

Importantly, these homes will provide a meaningful opportunity for younger families and working residents to attain homeownership in the City of Orange, helping to sustain a diverse and vibrant community.

In addition to its housing benefits, the project will generate positive fiscal impacts. It is projected to contribute approximately \$92,600 annually to the City's General Fund and produce \$2,686,865 in development impact fees, including \$1,539,205 for city capital projects and \$667,000 for local

schools. From both a fiscal and economic standpoint, this site is well-suited for residential development, and specifically, the proposal before you today.

For these reasons, we respectfully request your support of the proposed application and allow this project to move forward. At a critical time of limited housing supply, approving this development will help bring much-needed homes to the market while remaining consistent with the City's adopted plans and policies.

Thank you for your time and thoughtful consideration. Should you have any questions regarding this letter, please do not hesitate to contact me at agromis@biasc.org or (949) 777-3856.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ana Gromis', with a stylized flourish at the end.

Ana Gromis
Vice President of Government Affairs
Building Industry Association of Southern California



- 1) We are not opposed to housing here, if Council property finds that changing the land use from commercial to residential is fiscally responsible. We share our request in case that occurs.

Our overarching concern is the overwhelming height and insensitivity to the surrounding neighborhood. We are extremely concerned about the inconsistency of three stories next to two well-established one-story neighborhoods (zoned R-3a – single-story overlay). Our request: Limit project height to 2 story where adjacent to the south and north property lines. See highlighted areas of the cities Small Lot Subdivision Ordinance and Guidelines an explain specifically how the findings can be made. We request to be treated with same respect and fairness like the two similarly approved projects:

- Viewpoint on Katella: applicant/developer lowered the height of the homes next to adjacent one-story homes to two story with a height of 20 feet with a deeper second-story setback of +/-12.5 feet. The yard is 10 feet deep on the first level. The three-story units are massive, but they are closer to Katella.
- The Fletcher Standard: Applicant/developer was very sensitive to the surrounding two-story homes by lowering the overall height of the 15 homes and made all rear facing (facing the existing neighbors) third floor windows fixed and non-egress. All egress windows were shifted to the interior side of the homes for the third level master bedroom. Frosting windows that can open or be changed out even with a condition of approval doesn't respect all 88 property owners and residents that will see this project every time they go outside.
(715 West Fletcher)

- 2) Alternative grading option for the site: If the developer can't prove to decision-makers why a two story isn't physically viable (likely smaller 1,600 to 1,800 square foot home that Orange clearly needs) we request the project be conditioned to drop site grade conditions down another 3 to 5 feet lower (project must re-grade the whole property anyway to recompact it and install all infrastructure for the new homes **) so it provides a 2-story feel for Coco Palms and Park 72 property owners.
- 3) Real privacy concerns for 88 property owners: All rear elevation windows overlook directly into existing south (and north) property owners' homes, patios, and all common areas. Our request: All required egress windows to shift to the east and west sides of proposed homes that are adjacent to one-story communities. All windows on third floor shall be fixed (frosting isn't enough) and if possible, do the same for the second floor as well. We understand landing pads on the sides maybe an issue and suggest a unit on the north and south sides of project be removed to make enough space to address that issue. Or consider other options or reduce the units to a two-stories along this edge.

** see grading and infrastructure disclosures of the Final and Draft Mitigated Negative Declaration

- 4) Height softening and additional privacy. Request: Soften the rear elevation for neighbors by planting more evergreen native trees on the south and north property lines. Use a 3rd party independent Landscape Architect, to recommend best tree options. If needed, provide wider setback to the north and south property lines in the private yards so abundant trees can be provided at the time of occupancy. Plus, all trees shall have root barriers so down and not grow toward or in any impact the existing and shared north or south shared property areas or walls.
- 5) Confirm if all existing power lines to and thru the site will be underground including those that tie into our service.
- 6) Condition the project to work with Coco Palms HOA on protecting the condition of the shared wall. Any damage to the existing wall will require its replacement during construction or thereafter. Work with HOA on a maintenance agreement protecting both parties on future wall needs.
- 7) Condition the project to confirm and communicate all phases of project construction thru direct mail, with an emergency 24-hour hotline phone number, and early consulting with the HOA Board presidents (or management company) and the mobile home park.

Long-term community issues

Traffic problem: Adding 71 housing units on an almost 5-acre lot will increase the traffic on Tustin Street. The study that was done did not consider the shift in **the peak use** and the **daily nuisance** of the delay we will have to endure in leaving our property.

- Short-term
To help mitigate additional challenges can the signals to the south and north be staggered, or with better integrated timing.
- Long-term
With the re-development of the Mall property, those plans shall re-locate the signal to the entrance of Coco Palms and the entrance to the commercial properties on the east side of Tustin

Fiscal impacts: Giving away commercial sites is not wise per the Grant Thornton report. Will a 2% increase in property taxes annually and high wage homeowners pay for all city services forever? That's a gamble we are in position to take due to our current structural financial situation.