

901 East Katella Avenue Residential Development Project

FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION NO. 1882-22

SCH 2023110185



Lead Agency:

City of Orange

Community Development Department • Planning Division

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March 5, 2024

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SECTION 1.0 INTRODUCTION

1.1 Introduction

This Final Initial Study / Mitigated Negative Declaration (Final IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

This document contains responses to comments received on the Draft IS/MND No. 1882-22 for the 901 E. Katella Residential Development Project (Project) (State Clearinghouse No. 2023110185) during the public review period, which occurred November 9, 2023, through December 11, 2023. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated Draft IS/MND comprise the Final IS/MND. A Mitigation Monitoring and Reporting Program (MMRP) incorporates commitments in the form of Project Design Features (PDFs) and Mitigation Measures to ensure implementation. The MMRP is included as **Attachment E**.

The Draft IS/MND No. 1882-22 for the 901 E. Katella Residential Development Project (Project) (State Clearinghouse No. 2023110185) is hereby incorporated by reference, in its entirety. The Draft IS/MND is available for review at the Orange City Hall, Offices of the City Clerk and Community Development Department, 300 East Chapman Avenue, Orange, CA 92866, on the City's website at <https://www.cityoforange.org/our-city/departments/community-development/planning-division/current-projects>, and included as **Attachment F** to this document. The technical appendices to the Draft IS/MND are included as **Attachment G**.

The City published a Notice of Intent and circulated a Draft IS/MND for public review and comment for the period of November 9, 2023, through December 11, 2023. A total of 37 correspondences were submitted to the City during the review period. Section 2 of the Final IS/MND includes a list of all correspondence submitted to the City on the Draft IS/MND, each identified by a number for later reference, together with the authors and the dates the letters were received. Following this list, all of the letters are presented, with numbered brackets to highlight specific comments that are responded to in the next section.

SECTION 2.0 RESPONSE TO COMMENTS

This Final IS/MND has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the Draft IS/MND are excerpted in this document, the sections are shown indented. Changes to the Draft IS/MND text are shown in **underlined bold** text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons who submitted comments on the Draft IS/MND during the public review period.

This section provides all written responses received on the Draft IS/MND and the City's responses to each comment.

Number Reference	Commenting Person/Agency	Date of Comment
Agency Comment Letter		
A-1	Caltrans	December 11, 2023
Individual Comment Letter		
1	Jay Chaisson	November 11, 2023
2	Dan Graupensperger	November 15, 2023
3	Joseph and Zeina Fierro	November 26, 2023
4	Rosalie Huynh	November 28, 2023
5	James Garaghty	November 28, 2023
6	Schoen Tucker	November 28, 2023
7	David Nelson	November 28, 2023
8	Jamie Fingal	November 29, 2023
9	Kevin Tong	November 29, 2023
10	Jenny Tom	November 29, 2023
11	Timothy Chi Ngo	November 30, 2023
12	David and Linda Crawford	November 30, 2023
13	Denise Floryan	November 30, 2023
14	Alex Martin	December 1, 2023
15	Joann Jeon	December 2, 2023
16	Amy Moen	December 2, 2023
17	Karen Goran	December 3, 2023
18	Hung Doan	December 3, 2023
19	Kevin O'Connor	December 4, 2023
20	Adam Le	December 4, 2023
21	Carolyn Jones	December 4, 2023
22	Jeffrey Jones	December 4, 2023
23	Kendall Jones	December 4, 2023
24	Laurence Hamlin	December 4, 2023
25	Stephen and Kristina Reifenstein	December 4, 2023
26	Todd and Brittany Calvert	December 4, 2023
27	Betty and Bill Bath	December 5, 2023
28	Eduardo Esquivel	December 5, 2023
29	Mai Vu	December 5, 2023
30	Mika Jones	December 5, 2023
31	Katherine Gernak	December 5, 2023

Number Reference	Commenting Person/Agency	Date of Comment
32	Al Tucker	December 5, 2023
33	Jeremy Campadonia	December 6, 2023
34	Melissa Campitelli	December 6, 2023
35	Janet Majick	December 6, 2023
36	Pamela Dittrich	December 6, 2023

2.1 General Response 1 – Traffic and Parking

Many of the comment letters received on the Draft IS/MND include one or more comments pertaining to traffic congestion, sight distance and turning movements, parking, and vehicle miles travelled. Instead of repeating responses, one comprehensive response to these related topics is provided.

In 2013, the State Legislature signed into law Senate Bill 743, which changed the requirements for analyzing traffic pursuant to the California Environmental Quality Act (CEQA). SB 743 requires CEQA documents to analyze vehicle miles travelled (VMT) instead of auto delay at intersections or similar measurements of traffic congestion. In response to SB 743, the City of Orange adopted guidelines for preparing traffic studies. The guidelines, titled Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (TIAG), were adopted in July 2020. These guidelines require Applicants prepare a traffic study that includes both VMT analysis and traffic congestion analysis.

Numerous comments suggested the traffic study for the Project was inappropriately prepared in 2020, in the middle of Covid. These comments are incorrect. The traffic study for the Project was prepared October 2022, and unaffected by Covid as explained later in this response. The City’s traffic guidelines were prepared in 2020 during the time of Covid.

The first step in preparing the traffic congestion analysis is to determine the number of trips generated by the Project. Trip generation is not based on the number of bedrooms or number of new residents. Instead, trip generation relies on the number of average daily trips per dwelling unit as determined by the Institute of Traffic Engineers (ITE). The average daily trips account for a wide variety of vehicle trips, such as work trips, school trips, landscaping, delivery trucks, etc. By applying the trip generation rates from ITE as outlined in the trip generation analysis included in **Appendix K**, the Project would generate 353 vehicle trips in a 24-hour period, with 24 trips during the morning (AM) peak one-hour period and 28 trips during the afternoon (PM) peak one-hour period. The City’s traffic study guidelines state that a more detailed traffic analysis is only required when a project generates 51 or more peak hour trips. Since the proposed Project generates much less than 51 peak hour trips, no further traffic study is required and for the congestion portion of the analysis, impacts were determined to be less than significant.

The trip generation analysis prepared in October 2022 was unaffected by Covid because the study relies on trip generation factors prepared by the Institute of Traffic Engineers, which has been compiling traffic data for decades. The study did not rely on any intersection counts or traffic patterns that could have been affected by Covid.

To put the trip generation numbers into perspective, the existing commercial zoning on the Project site would allow for general office, medical office, or retail uses, which have different trip generation rates

based on the amount of building square footage. The following comparison relies on the amount of square footage of the existing building on the Project site, which is approximately 20,621 square feet. The following table compares trip generation rates between general office, medical office, retail, and the proposed Project.

Table 1: Trip Generation Comparison

Use	Average Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
General Office	224	31	30
Medical Office	742	64	81
Retail	1,123	49	136
Proposed Project	353	24	28

Source: 2021 ITE Trip Generation Manual (11th Edition)

As shown in Table 1, the proposed Project generates fewer AM and PM Peak Hour trips than other uses permitted by the current zoning.

The Draft IS/MND also includes a sight distance analysis prepared May 30, 2023, and included as Appendix L. The sight distance analysis analyzed the turning movements into and from the Project site from the driveway on Cambridge Street. The study takes into consideration sight distance and vehicle speeds. Speed count data was collected on Cambridge Street on July 12, 2022. The study concluded that sufficient stopping sight distance exists for outbound (leaving the Project site) left turn and right turn movements. Therefore, there are no restrictions on outbound turning movements. However, the study determined that insufficient stopping sight distance is available for southbound Cambridge Street left turn movements into the Project. Therefore, Mitigation Measure MM TRANS-1 was included in the Draft IS/MND to restrict southbound left turns into the Project.

Many comments focused on the difficulty for existing residents making a left turn onto southbound Cambridge Street from East Carleton. That turning movement and the sight distance associated with that turning movement is an existing condition, which occurs with or without the proposed Project. Because that condition is existing and the Project has no ability to affect or revise that intersection, no further sight distance of that intersection was prepared.

The proposed Project generates 24 to 28 peak hour trips during the AM and PM peak hour periods, respectively, and 353 daily vehicle trips over a 24-hour period. The Project site has two driveways and traffic will disburse in multiple directions from those driveways. Therefore, not all Project vehicle trips would occur northbound on Cambridge Drive and impact turning movements from East Carleton.

Cambridge Drive is designated as a secondary arterial roadway. According to the City’s Circulation and Mobility Element of the General Plan, secondary arterials have a daily capacity of up to 24,000 vehicle trips¹. The City conducts traffic counts approximately every two years. According to the City’s 2020 traffic counts, Cambridge Street between Katella and Taft Avenue had 6,700 average daily trips (ADT). This count would have been affected by Covid. The counts in 2016 showed 9,400 ADT and in 2018 9,800 ADT, which more closely approximate current traffic volumes. Based on traffic volumes of around 10,000 ADT and a roadway capacity of 24,000 ADT, the roadway has sufficient design capacity to accommodate the additional 353 ADT produced by the Project.

¹ City of Orange General Plan Circulation and Mobility Element, Table CM-3, Page CM-13

Therefore, the additional traffic generated by the proposed Project is 1) less than the threshold established by the City for further study, 2) a fraction of the total number of existing (non-Project) trips on Cambridge Street, and 3) a very small percentage of the overall design capacity of Cambridge Street. The traffic concerns expressed by the residents are recognized, however, the existing traffic conditions at East Carleton were not caused by the Project and the Project would not change or substantially exacerbate the existing traffic conditions. Therefore, under the thresholds established by CEQA, the Project would not cause a significant traffic impact.

Numerous comments also expressed concern about the amount of parking provided by the Project. Parking is provided in enclosed garages and open guest parking spaces. The City of Orange Municipal Code requires a total of 128 parking spaces. This calculation is based on 2 spaces for each 3-bedroom unit, 3 spaces for each 4-bedroom unit, and 0.25 spaces for each dwelling unit. The proposed Project provides 128 parking spaces. Each dwelling unit includes a two-car enclosed garage and 30 uncovered guest parking spaces are provided.

Parking is not an environmental topic specifically included in State CEQA Guidelines Appendix G, therefore, the Draft IS/MND does not include a parking study or specific parking analysis. The Land Use Section (Appendix G, XI (b)) of the CEQA Guidelines establishes a threshold of significance pertaining to consistency with adopted policies or regulations (codes), which could include the parking code if an inconsistency would cause an environmental impact. Since the proposed parking provided by the Project is consistent with City code requirements, the Project is consistent with adopted parking regulations and therefore no impact would occur.

The VMT analysis for the proposed Project (RK October 2022) relied on the North Orange County Collaborative VMT Traffic Study Screening Tool (NOCC+) to evaluate vehicle miles generated by the Project. This analysis concluded that Project generated VMT per service population (15.4 VMT per service population) would not exceed the City of Orange General Plan Build Out Baseline VMT per service population threshold (31.3 VMT per service population).

To confirm the conclusion from the NOCC+ screening tool, a supplemental VMT analysis was prepared by RK Engineering Group (**Attachment A**) that includes a full model run of the Orange County Transportation Analysis Model (OCTAM). The OCTAM Model run determined that the City of Orange has a General Plan Build-Out (Year 2030) VMT per service population of 28.3. This VMT per service population represents one of the thresholds of significance for determining Project impacts. The OCTAM model run for the proposed Project determined that for the Base Model Year (2016) with Project the VMT per service population would be 15.4. For the Cumulative Model Year (2045) with Project the VMT per service population would be 15.2. In both model year runs, the proposed Project would not exceed the City's threshold of significance of 28.3 VMT per service population. A second threshold of significance pertains to whether the baseline or cumulative project-generated VMT per service population would increase under the plus project condition compared to the no project condition. The OCTAM model run determined that in the 2016 base model year, the Project would reduce VMT 0.025%. In the 2045 cumulative model year, the Project would reduce VMT 0.034%. Therefore, the Project would not cause an increase in citywide VMT per service population. The supplemental VMT analysis confirmed the conclusions derived from the NOCC+ screening tool and no changes to the conclusions presented in the Draft IS/MND would occur.

2.2 General Response 2 – Privacy, Light, and Shade/Shadow

Many of the comment letters received on the Draft IS/MND include one or more comments pertaining to privacy, light, and shade/shadow concerns. Since these are related topics, instead of repeating responses, one comprehensive response to these related topics is provided.

Many of the comments have expressed concern about the loss of privacy and shading due to a 10-foot setback from the northern Project boundary and two and three-story homes, some with roof decks. This response first addresses the thresholds of significance established by CEQA and the City for the topics of privacy and shading. Second, this response addresses the change in zoning from C-P to R-3 with application of the Small Lot Subdivision Ordinance development standards. Lastly, this response provides analysis of shading from the proposed Project compared to the existing condition.

Thresholds of Significance

Cities establish thresholds of significance to determine whether an impact is significant or less than significant. Often cities rely on the checklist in Appendix G of the CEQA Guidelines to establish the thresholds of significance. Cities can also adopt thresholds of significance through the adoption of local CEQA Guidelines.

For the topic of privacy, the CEQA Guidelines Appendix G does not establish thresholds of significance for privacy impacts. First, privacy is subjective and second it has not been determined to be an environmental impact analyzed pursuant to CEQA. Additionally, the City of Orange has not adopted thresholds of significance for privacy in locally adopted CEQA guidelines or in the municipal code. The CEQA Guidelines addresses impacts to aesthetic resources, such as scenic resources and scenic vistas, but not privacy. Furthermore, private views are not protected by CEQA or California law. Therefore, privacy is not an environmental impact analyzed under CEQA.

Shading and shadowing can be a potential impact when a building(s) blocks sunlight from neighboring properties, including roof-top solar. The CEQA Guidelines have not established shade/shadow thresholds of significance, nor has the City of Orange formally adopted code standards or thresholds of significance as part of the City's local CEQA Guidelines. While not a formally adopted threshold of significance, the City's past practice has been that new shading from a project should not continuously cover either rooftop solar panels or residential windows for a two-hour period between 7:30 am and 9:30 am. The City uses the winter solstice for the analysis because the sun angle is lowest on that day, resulting in the most restrictive condition of the year. The spring and fall equinox and summer solstice may also be analyzed, but are not required, for this Project because the sun angle is much higher during those times of year, resulting in less shading.

Light and glare are topics addressed by CEQA in Appendix G of the CEQA Guidelines. Appendix G states:

Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

This question in Appendix G is often used as a threshold of significance for light and glare impacts.

Change in Development Standards

The Project proposes a zone change from a commercial zone (C-P) to a residential zone (R-3) with the application of the Small Lot Subdivision Ordinance development standards. While CEQA does not

establish thresholds of significance for privacy or shading, it is important to consider whether the change in zoning, and therefore a change in development standards, would have a substantial effect on surrounding land uses.

The two development standards that most affect the adjoining residential properties on E. Carleton Avenue are the setback from the northern Project property boundary and the height limit.

The existing C-P zone requires a setback of 0-feet along the northern Project property boundary and a height limit of 32 feet. Therefore, a commercial developer could build a 32-foot-tall office building or other commercial structure 0 feet from the northern Project property boundary without the need for discretionary City approval (called “by right”) because the commercial use and structure would be consistent with existing zoning standards.

The proposed Project requests a zone change to R-3 with the application of the Small Lot development standards. The Small Lot development standards require a 5-foot setback along the northern Project property boundary and a 35-foot height limit. Therefore, the zone change would increase the setback standard from the northern property boundary and allow for an increase in height by 3 feet.

However, for the proposed Project, the Applicant has restricted the building height for the first row of residential units to two-stories and increased the setback of the second story for these units. The proposed two-story structures measure approximately 20 feet to the eave and 24.5 feet overall height, and the second story of those residential units would be setback an additional 2 - 5 feet, for a total second story setback between 12 and 15 feet from the northern property boundary. Therefore, the Project would result in the height of the structures being approximately seven (7) feet lower than permitted in the C-P zone and setback 10 feet and more than permitted in the C-P zone. That two-story height restriction and additional second story setback for the northern-most row of residences would be governed by the Design Review approval and conditions of approval.

Therefore, the proposed change in zone and development standards would not cause an adverse effect on surrounding land uses and furthermore, the restrictions placed on the proposed Project would be more restrictive and have less effect on surrounding land uses than the commercial development that could be built “by right” under the existing C-P zoning standards.

Shade / Shadow Analysis

While neither the CEQA Guidelines nor the City of Orange have established thresholds for significance for shading, the City’s past practice has been that new shading from a project should not continuously cover either rooftop solar panels or windows for a two-hour period between 7:30 am and 9:30 am. The City uses the winter solstice for the analysis because the sun angle is lowest on that day, resulting in the most restrictive condition.

Two of the technical components of this analysis are the azimuth of the sun, which is the location of the sun in degrees from north, and the sun angle elevation. Both of these components were used in the shading analysis during the winter solstice at the latitude and longitude of the Project site.

Attachment B (sheets L7-L8) provides a shade analysis during the winter solstice from 7:00 to 9:30 am in both the existing condition and the proposed condition. This analysis was done from overhead, in the 9:30 am condition, a yellow line marks the limits of shading. In all but two locations, 932 and 942 E. Carleton Avenue, Project shading is absent from the residential structures along E. Carleton Avenue by 9:30 a.m.

Further analysis of both 932 and 942 E. Carleton Avenue was performed to determine the change between existing and proposed conditions. Additional analysis and modeling were necessary because of the existing vegetation both on the Project site as well as on each individual property. The analysis, included in **Attachment C (sheet L35)**, is shown at an angle, which allows for the relationship between the existing landscape and the residential structures to be clearly seen. The analysis shows that the proposed Project would not create new shading impacts beyond what occurs during the existing condition on the winter solstice due to existing vegetation on the Project site and on each private property.

It is important to further note that the shading impacts from the proposed Project are less than what could occur “by right” under existing zoning. The existing zoning permits a 32-foot-tall commercial structure located where the Project proposes structures less than 25 feet tall. The additional seven (7) feet in building height permitted under the existing zoning would increase the shading of the residential properties along E. Carleton compared to the proposed Project.

Light and Glare

The CEQA Guidelines has identified projects that create “a new source of substantial light or glare which would adversely affect day or nighttime views in the area” as causing a significant impact. The proposed Project includes residential lighting, consistent with the lighting found in the E. Carleton Avenue neighborhood and generally less intensive than commercial lighting that could be found in the C-P zone. Therefore, the lighting associated with the proposed residential neighborhood is not considered a source of substantial light. To further document this conclusion, a photometric analysis was prepared to show footcandles and light spillage from the light sources proposed on the Project site. The photometric analysis is included as **Attachment D** to this document. Furthermore, the Project does not include an architectural style with reflective glass windows often found in commercial buildings that could cause glare impacts.

2.3 Response to Comments

The following are specific responses to comments received during the public review period.

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Agency Comment Letter A-1 – Caltrans (December 11, 2023)

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 12
1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705
(657) 328-6000 | FAX (657) 328-6522 TTY 711
<https://dot.ca.gov/caltrans-near-me/district-12>



December 11, 2023

Ms. Monique Schwartz
Senior Planner
City of Orange
300 E. Chapman Ave.
Orange, CA. 92866

File: LDR/CEQA
SCH:2023110185
12-ORA-2023-02420
SR-55, PM: 15.25
SR-57, PM: 12.525

Dear Ms. Schwartz,

A1-1

Thank you for including the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration (MND) for the 901 East Katella Residential Development Project. The Project proposes to redevelop an existing 2.71-acre commercial site with 49, two and three-story single-family small lot homes (17 paired and 15 detached), open space recreation areas, guest parking, and related site improvements. The unit mix includes three- and four-bedroom floor plans ranging from approximately 1,701 to 2,004 square feet and the incorporation of roof decks on all three-story units with a maximum building height of 35 feet. The project proposes 12, two-story detached units along the north property boundary, adjacent to existing single-family homes.

The project site is located at 901 E. Katella Avenue (Northeast corner of E. Katella Avenue and N. Cambridge Street) Assessor's Parcel Number (APN) 375-461-41. State Route 55 is less than a mile from the project site and State Route 57 is approximately 2 miles from the project site. State Route 55 and 57 are considered to be within the project area and are owned and operated by Caltrans. Therefore, Caltrans is a responsible agency on this project, and has the following comments:

A1-2

1. Caltrans supports opportunities for affordable housing, and the state mandates that cities must plan for housing needs of future residents of all incomes. Please provide an analysis and discussion that would assist in accommodating the Regional Housing Needs Assessment (RHNA) allocation per the California Department of Housing & Community Development (HCD).

A1-3

2. Caltrans recognizes our responsibility to assist communities of color and under-served communities by removing barriers to provide a more equitable transportation system for all. The Department firmly embraces racial equity,

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Ms. Monique Schwartz
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inclusion, and diversity. These values are foundational to achieving our vision of a cleaner, safer, and more accessible and more connected transportation system. Please consider including a discussion on equity in the MND.

A1-4

3. Residential infill development offers an opportunity to encourage multimodal transportation options. Caltrans encourages the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. This may include safety measures such as physically separated sidewalks and bike lanes; pedestrian-oriented LED lighting; high-visibility continental crosswalk striping; raised crosswalks; refuge islands; wayfinding signage; and safe connections to existing and proposed bicycle, pedestrian, and transit facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation.

A1-5

4. Caltrans supports projects which provide a diversity of housing choices and destinations accessible by Active Transportation (i.e. bicycle and pedestrian) and transit users. Please consider improving multimodal connections to housing which will encourage future residents, visitors, and workers in the city to utilize all modes of transportation. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.

A1-6

5. Caltrans seeks to promote safe, accessible, multimodal transportation. Please consider methods to reduce pedestrian and bicyclist exposure to vehicles by lessening the time that the user is in the likely path of a motor vehicle. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, off-road paths and trails, or a reduction in crossing distances through roadway narrowing. Caltrans recommends the project consider concepts such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping, to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists where appropriate.

A1-7

6. Caltrans encourages the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. This may include safety measures such as physically separated sidewalks and bike lanes, pedestrian-oriented LED lighting, high-visibility continental crosswalk striping, raised crosswalks, refuge islands, wayfinding signage, and safe connections to existing and proposed bicycle facilities. Complete Streets improvements promote regional connectivity, improve air quality, reduce congestion, and increase safety for all modes of

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transportation. (see Caltrans' Director's Policy on Complete Streets here <https://dot.ca.gov/-/media/dot-media/programs/esta/documents/dp-37-complete-streets-a11y.pdf>)

- A1-8 | 7. There are several planned and existing bikeways surrounding the project area. Please consider adding dedicated bicycle infrastructure on E. Katella Avenue in the form of bike lanes or other traffic calming measures to facilitate regional access to these existing and planned connections. For example, the Class II bike lanes on N. Cambridge Street run perpendicular to the E. Katella corridor; to the east, SART provides north/south connections to the entire county; and to the north, a planned bike lane on W. Taft Avenue connects to SART and other planned bike routes. (Source for existing/planned regional infrastructure: <https://www.octa.net/getting-around/active/oc-bike/bikeways-planning/overview/>)
- A1-9 | 8. During construction, please ensure appropriate detours, signage, and safety measures are planned that prioritize and ensure the safety and mobility of pedestrians, bicyclists, and transit users.
- A1-10 | 9. Please identify the existing transit services for local and regional bus services including the connectivity to rail services from the nearest train stations provided by Metrolink and/or Amtrak Pacific Surfliner. Also, please provide adequate wayfinding signage to transit stops within all the project vicinity and local roadways.
- A1-11 | 10. Please Consider encouraging or incentivizing the use of transit among both construction workers of the proposed development and future employees. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled, and improve air quality.
- A1-12 | 11. Consider how many individual packages will be delivered daily to individual residences within the areas identified for increased housing production. Shared drop-off locations can help reduce the amount of driving done by delivery trucks and can increase the efficiency of deliveries in densely developed areas. Similarly, high-density residential developments should consider automated parcel systems (i.e., Amazon Lockers) so that deliveries can be made with one truck stop instead of multiple stops to individual residences.
- A1-13 | 12. If truck parking (i.e., for home deliveries) is to be on-street, ensure the width of the parking lane is wide enough for freight trucks without encroaching on bicycle lanes, vehicle parking or street lanes.

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A1-14

13. The project is anticipated to generate an increased amount of residential traffic. Any potential adverse traffic impacts to freeway facilities including on and off ramps in the vicinity should be studied, determined and mitigated.

Caltrans' mission is to provide a safe, sustainable, equitable, integrated, and efficient transportation system to enhance California's economy and livability. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at Julie.lugaro@dot.ca.gov.

Sincerely,



Scott Shelley
Branch Chief,
LDR-Climate Change-Transit Planning
Caltrans, District 12

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Agency Response A-1 – Caltrans (December 11, 2023)

- A1-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- A1-2 The comment expresses support for affordable housing and meeting the RHNA allocation. The Project site is not identified in the City’s Housing Element for production of affordable housing and the City has identified other candidate sites to meet its RHNA allocation.
- A1-3 The comment suggests adding a discussion of racial equity into the ISMND. The City fully supports racial equity; however, this project does not create an environmental justice issue and therefore, racial equity is not an environmental topic of concern in the ISMND.
- A1-4 The comment encourages the use of Complete Streets, which is noted. The proposed Project does not include off-site roadway improvements and does not have the ability to convert off-site roadways into Complete Streets.
- A1-5 The comment suggests supporting Active Transportation and transit users. The Project is located near commercial uses and bus stops, both of which encourage Active Transportation and transit use.
- A1-6 The comment encourages promoting multimodal transportation. The Project is located near commercial uses and bus stops. Pedestrian access from the Project site to existing sidewalks would be provided. No other off-site roadway improvements are part of the Project.
- A1-7 The comment encourages the use of Complete Streets, which is noted. The proposed Project does not include off-site roadway improvements and does not have the ability to convert off-site roadways into Complete Streets.
- A1-8 The comment suggests adding dedicated bicycle infrastructure to E. Katella Avenue. The comment is noted, but beyond the scope of the Project. The proposed Project does not include off-site roadway improvements and does not have the ability to add off-site bicycle lanes to E. Katella Avenue.
- A1-9 The comment requests appropriate detours, signage, and safety measures for pedestrians, bicyclists, and transit users. Any work done within public right-of-way is required to have appropriate detours, signage, and/or safety measures in accordance with the City’s encroachment permit procedures.

- A1-10 The comment requests identification of bus service and connectivity to train stations. The Project site is located approximately 2.3 miles east of the ARTIC Station and 2.4 miles north of the Orange Station. OCTA Bus Route 50 provides east/west transit along Katella, including transit to the ARCTIC Station. OCTA Bus Route 71 provides north/south transit along Tustin Avenue, just east of the Project site, and Bus Route 59 provides north/south transit along Glassell just west of the Project site.
- A1-11 The comment requests incentivizing the use of transit for construction workers. The comment is noted and will be considered as a condition of approval. No significant impacts were identified triggering the need for this suggestion to be included as a mitigation measure.
- A1-12 The comment requests consideration of shared drop-off locations for delivery trucks. The comment is beyond the scope of the Project and the ISMND.
- A1-13 The comment pertains to on-street truck parking. No on-street truck parking is permitted within the Project site and no parking is permitted on surrounding arterial roadways.
- A1-14 The comment pertains to trip generation. Please refer to **General Response 1**.

Remainder of this page left intentionally blank.

Individual Comment Letter 1 – Jay Chaisson (November 14, 2023)

Monique Schwartz

From: J. Chaisson <jayc1@yahoo.com>
Sent: Tuesday, November 14, 2023 12:14 PM
To: Monique Schwartz; Vicki Chaisson
Subject: Project @ 901 E Katella Avenue

You don't often get email from jayc1@yahoo.com. [Learn why this is important](#)

Good morning Monique.

1-1 Last night my wife and I attended a meeting at El Modena Library hosted by Emilie Simard. We live on N Pine Street about 200 yards from the former AT&T lot. While my neighbors on Carleton street may voice their concerns over the privacy the proposed units may be taking away from them, all people attending the meeting agreed traffic and safety is a top concern. Cambridge Street between Katella and Chestnut is a very dangerous section of road way. Crossing the street at various points between those streets is dangerous for people animals or cars, the comments made in the conclusion of Appendix J imply the amount of new traffic generated by these additional units do not need additional study since the anticipated traffic is not considered impacting. While the traffic on this stretch of road does not produce traffic jams, it does create a solid stream of traffic making the crossing unsuitable in the mornings and evenings for even Orange High track stars. Other times of the day produce moderate traffic flows. My neighbors and I have attempted to petition the city to place a 4 way stop sign at Trenton and Cambridge for years and we have been denied based upon the City's view there is not enough traffic. See for yourself some morning by attempting to cross Cambridge and Trenton as mothers rush their children to school in their cars, while their dads zoom by at higher than posted speeds to get to work. We are still waiting for the city to alleviate this situation.

1-2 Explain to me how the Intersection of Palmyra and Shaffer can have a 4 way stop sign for a much lighter traffic flow.

1-3 Residents will require the City present mitigations and offsets where traffic exiting the former AT&T lot will not be forced onto other side streets.

1-4 For example, traffic exiting the proposed project attempting to turn left at high volume times of the day will be extremely distressed attempting to do so. I will be attending the next meeting on Nov 27th at the Main Orange library. I suggest you attend as an interested onlooker to hear the concerns prior to the City meetings.

Please place my name on all future correspondence for this project. I believe you, as a representative of the City will find a way to make this project work. The proposal is better than another car wash or fast food restaurants.

Thank you for listening to my concerns.

Jay

Individual Response 1 – Jay Chaisson (November 14, 2023)

- 1 - 1 The comment suggests that Cambridge Street between Katella and Chestnut is a dangerous street and crossing the street is dangerous due to the steady stream of traffic. It is unclear whether the Commenter is describing crossing Cambridge Street at a designated crosswalk or at an unmarked location. Please refer to **General Response 1**.
- 1 - 2 The comment questions why four-way stop control is provided at the intersection of Palmyra and Shaffer. The rationale for the intersection control is beyond the scope of this environmental document.
- 1 - 3 The comment requests mitigation to prevent traffic exiting the Project site from being “forced onto other side streets.” The proposed Project has two points of access, one connection to Cambridge Street and another connection to E. Katella. Cambridge Street and E. Katella are both classified as arterial roadways, not side streets. Please refer to **General Response 1**.
- 1 - 4 The comment expresses concern about Project traffic turning left during times of high traffic volume. It is unclear from the comment, what left turn is being referenced. Please refer to **General Response 1**.

Remainder of this page left intentionally blank.

Individual Comment Letter 2 – Dan Graupensperger (November 15, 2023)

Monique Schwartz

From: Dan Graupensperger <yonka@pacbell.net>
Sent: Wednesday, November 15, 2023 7:04 PM
To: Monique Schwartz
Subject: 901 E Katella

Monique.

2-1 | Thanks for the link to the map. At first blush it looks like there are about 2.8 possible parking spots for each unit. Many of these are 4 bedroom with 3.5 bathroom units. What that means in real life is there will be three to four cars for each unit actually in the complex or more likely parked around in the surrounding neighborhood unless there is enough curb side parking in the complex. It looks like the streets are about 25 ft. wide but I cannot tell if this includes any sidewalk. As I remember this parking ratio meets code. However, in real life it is not adequate. All of these kinds of projects, and I include the newest problem child the ADU sound great on paper but they end up having a negative affect on the neighborhood. On my street which has no projects like this on the street but there is an apartment complex around the corner, the overflow parking has on occasion forced me to put my trash cans in front of the neighbors house because there is no curb space in front of my residence. I respectfully request you tell the developer to go back to the drawing board and come up with more parking on site within the complex.

2-2 | Or it could be I am full of it and there will be no problems.
On a side note, after 36 years on the Orange fire department my experience tells me those streets are going to be tight for an engine and really tight for a tiller truck.
Be well, enjoy the cooler weather,
Dan Graupensperger

Individual Response 2 – Dan Graupensperger (November 15, 2023)

- 2-1 The comment suggests the proposed parking is inadequate. Please refer to **General Response 1**.
- 2-2 The comment suggests the street widths will be tight for a fire engine and tiller truck. The street widths have been reviewed by both the City engineering and fire departments and deemed to meet requirements.

Remainder of this page left intentionally blank.

Individual Comment Letter 3 – Joseph and Zeina Fierro (November 26, 2023)

Monique Schwartz

From: Zeina Habash <zhabash08@gmail.com>
Sent: Sunday, November 26, 2023 3:44 PM
To: Monique Schwartz
Cc: joseph fierro
Subject: Concerns about Intracorp development

You don't often get email from zhabash08@gmail.com. [Learn why this is important](#)

Hello Monique,

Hope you are doing well. My husband and I live at 1217 E Carleton Ave and are writing to you to share our concerns regarding the Intracorp development located on 901 Katella Ave. Here are our main concerns:

Parking issues

3-1 With 49 homes being built on a ~2.7 acre lot, two car garages and only 30 guest spots, these residents and their guests will park on our street as they cannot park on Katella or surrounding streets. Intracorp's requirement to not allow homeowners to flip their garages into living spaces will no longer be in their control in the future due to California's new law allowing garages to be rentable dwelling. Without a doubt, the homeowners (HOA) will change this requirement and we will have an even worse parking situation.

Dangerous opposing traffic turns and increase in noise

3-2 Having to make a left turn on Cambridge from Carleton towards Katella is already challenging and hard to see cars coming around the corner, especially when people are driving fast. This will make it more challenging for us to make a left turn given the increase in traffic and proximity to my street. More cars and people will only mean more noise on a street that is quiet, which is very important to us. The bus stop at the corner of Katella and Cambridge is already busy and additional traffic in and out of both entry points of the new housing complex will increase backup. This is in addition to the senior living complex being built less than 1/4 mile on the same side of Katella.

Doesn't align with the aesthetic of Orange

3-4 We moved to Orange two and a half years ago because we love the charm that Orange offers, including living near the circle. This building will not go with the style of homes in the surrounding area. This will be the only 3 story building on Katella in our area.

Reduction in the value of our home

3-5 The 10 foot distance from the property line will make the homes on our street less desirable given the lack of privacy/noise/traffic, lowering comps in the neighborhood and as such lowering the value of my home.

3-6 We believe the only way this development would benefit the neighborhood would be to build a fraction of the number of homes (e.g. 25 or less) with additional guest parking, two-story maximum and additional space from the development and adjacent homes on our street. We understand there is a shortage of homes and we are not opposed to using this lot for housing but it has to be done in a thoughtful way that doesn't negatively impact the quality of life for existing homeowners and residents of Orange.

Thank you for taking our concerns into consideration.

Respectfully sent,
Joseph & Zeina Fierro

Individual Response 3 – Joseph and Zeina Fierro (November 26, 2023)

- 3-1 The comment suggests the proposed parking is inadequate. Please refer to **General Response 1**.
- 3-2 The comment pertains to concerns about traffic impacts. Please refer to **General Response 1**.
- 3-3 The comment suggests that more traffic will result in noise impacts. The additional traffic generated by the Project was analyzed in a Noise Study included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 3-4 The comment pertains to the style (architecture) of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 3-5 The comment suggests that the Project will lower the value of the Commenter's home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 3-6 The comment provides the Commenter's opinions on the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 4 – Rosalie Huynh (November 28, 2023)

Monique Schwartz

From: R H <rchuynh@hotmail.com>
Sent: Tuesday, November 28, 2023 6:15 PM
To: Monique Schwartz
Subject: Opposition to 901 Katella Development

Dear Ms. Schwartz,

4-1 | My name is Rosalie Huynh and I have lived at 1116 E Carleton Ave in Orange, CA for 23 years. I am writing this email to you to express my opposition to the application by Intracorp to build a 49 unit high/medium density small lot subdivision adjacent to our R-1 zone property.

4-2 | I purposely chose to buy a home in this type of neighborhood in Orange and not some high density cookie cutter community. I am not opposed to the construction of much needed additional housing but the purpose of zoning laws is to separate incompatible uses of property. The proposed community would place 12 two story units only **10 feet** away from our neighbors back wall. A home should be a sanctuary but a 10 foot setback will eliminate all privacy. The proposed additional 37 three story units with 37 roof top decks would cause noise and light pollution due to the density and proximity to our neighborhood.

4-3 | This project will create very serious traffic problems and additional dangers for all who travel on Cambridge St. It has always been a challenge to exit out of our neighborhood due to a poorly designed curve as you head North on Cambridge St from Katella Ave creating a blind spot for the residents of East Carleton Ave. The addition of 49 units would add at least 100+ cars going in and out of Cambridge St creating more hazards for everyone. The traffic study for this site was done in July 2020 right in the middle of Covid restrictions. This is not a true representation of current day normal traffic patterns. I encourage every traffic planner, city planner, city council and mayor to drive onto our street and then try to turn left onto Cambridge St - then you will understand our concern.

4-4 | The proposed community only has 30 parking spots without any driveways, curbs or streets where the residents can park. A standard garage will not fit 2 typical cars comfortably (and definitely not 3+ cars for 3/4 bedroom homes) thereby leading to parking outside of their community. Since parking is not allowed on Cambridge St, the overflow of cars will crowd our neighbors living near the entrance of Carleton.

4-5 | This project will be a first of its kind in Orange that is immediately adjacent to single family homes without any barriers or adequate spacing to provide any privacy. I've attached pictures of my neighbor's yards (with their permission) at a 15 foot setback at a height of 25 feet to show how apparent the loss of privacy is to these individuals. Please reconsider approving the

4-6

change in zoning for this lot as it does not adhere to the City of Orange’s General Plan Land Use, specifically:

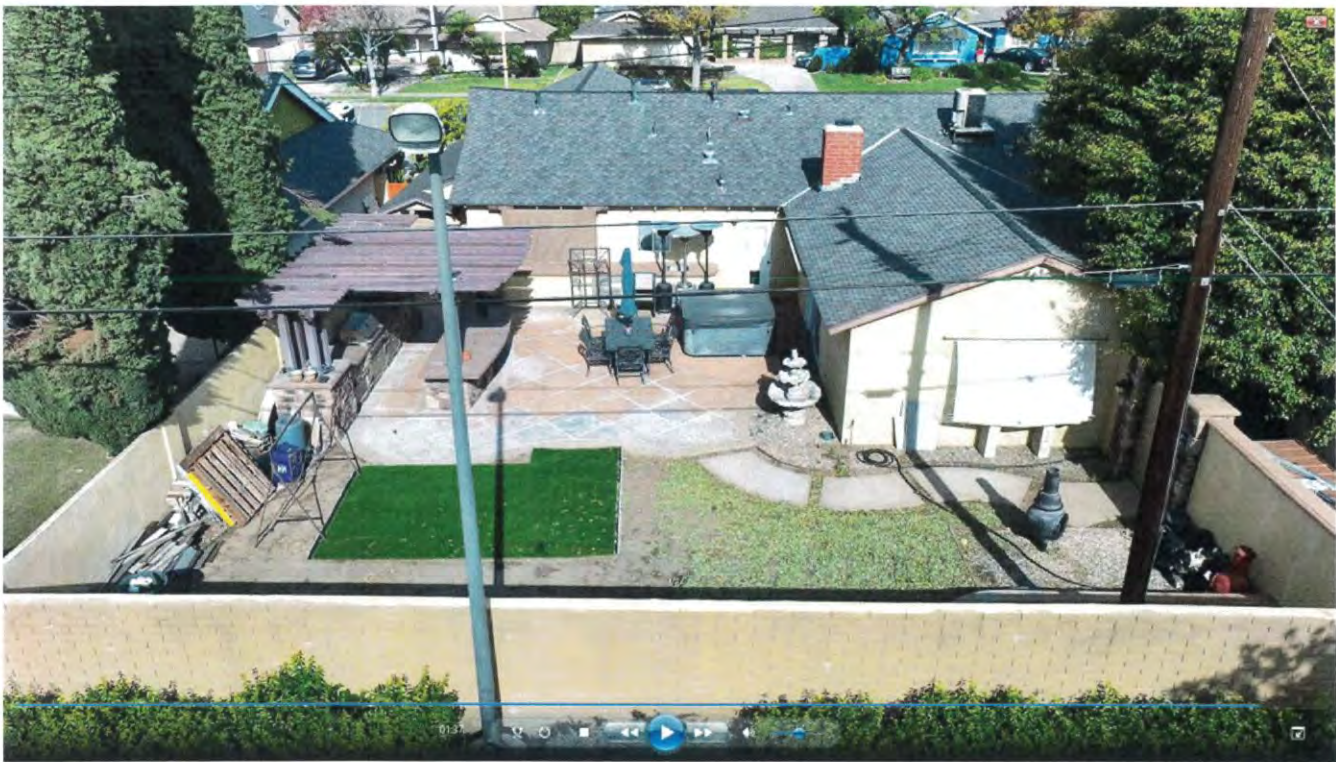
Policy 1.4: Ensure that new development reflects existing design standards, qualities and features that are in context with nearby development.

Policy 1.6: Minimize effects of new development on the privacy and character of the surrounding neighborhoods.

Policy 6.10: Mitigate adverse air, noise, circulation, and other environmental impacts caused by new development adjacent to existing neighborhoods through use of sound walls, landscaping buffers, speed limits, and other traffic control measures.

Thank you for your time and consideration,

Rosalie Huynh





Individual Response 4 – Rosalie Huynh (November 28, 2023)

- 4-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 4-2 The comment suggests the Project would cause noise and light pollution. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- Residential homes create new sources of light or glare, however the new light sources would have the same character and intensity as the existing surrounding light sources in the residential neighborhood to the north and lower intensity than the existing surrounding commercial light sources (see Draft IS/MND Page 24). Therefore, no significant impacts would occur from new light sources. Please refer to **General Response 2**.
- 4-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 4-4 The comment suggests the proposed parking is inadequate. Please refer to **General Response 1**.
- 4-5 The comment pertains to loss of privacy. Please refer to **General Response 2**.
- 4-6 The comment suggests that the Project is inconsistent with General Plan policies 1.4, 1.6, and 6.10. Policies 1.4 and 1.6 pertain to design and privacy. Please refer to **General Response 2**. Policy 6.10 states that impacts to air, noise, circulation should be mitigated through the use of sound walls, landscape buffers, speed limits, and other traffic control measures. The Draft IS/MND analyzed impacts to Air Quality (Section 5.3, Page 28), Noise (Section 5.13, Page 67) and Transportation/Traffic (Section 5.17, Page 81). The Draft IS/MND determined that no significant impacts and no mitigation measures are required for Air Quality and Noise impacts. The Draft IS/MND determined that the proposed Project would not cause a traffic impact to surrounding streets or intersections with implementation of one mitigation measure. Please refer to **General Response 1**.

Individual Comment Letter 5 – James Garaghty (November 28, 2023)

Monique Schwartz

From: James Garaghty <drjimbog@gmail.com>
Sent: Thursday, November 30, 2023 6:46 PM
To: Monique Schwartz
Subject: 901 Katella Residential Property

[You don't often get email from drjimbog@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

November 28, 2023

Dan Slater
CITY OF ORANGE
MAYOR

Monique Schwartz
CITY OF ORANGE
Planning Division
300 E. Chapman Avenue
Orange, CA 92866

Dear Ms. Schwartz:

My name is James I. Garaghty (drjimbog@gmail.com). I have lived at 1011 East Carleton Avenue in Orange, CA. with my family for the past 60 years.

5-1

I feel our elected city officials need to be aware of this proposal.

I am writing this email to you to express my opposition to the application by Intracorp to build a high density small lot 2 and 3 story subdivision adjacent to our R-1 zone property. I also feel that as our senior planner if you had viewed a city map at the onset you would have rejected this proposal immediately. Remember you are working for us. There should have been no reason whatsoever to get the existing homeowners in the area involved.

5-2

I am not opposed to housing construction. The primary purpose of zoning laws is to separate incompatible uses of property. Putting 49 units on two acres of property consisting of 12 two story units ten feet from our neighbors fences and allowing 37 three story units with 37 roof top decks which can be lighted and used day and night less than 50 feet from our single story homes is an invasion of our privacy in both our front and back yards which will also create substantial noise and light pollution. And what is the purpose of 37 roof top decks? To give the developer the density he needs to build an inappropriate project on this 2 acre parcel of land. In short, this project on this parcel of land is the definition of an incompatible use. In definition, it would look like you were living in San Bernardino or Riverside.

5-3

This project also creates serious traffic problems and additional dangers to the residents of East Carleton Avenue, Cambridge Street adjacent to the AT&T property is incredibly poorly designed. There is a curve in the road that makes it impossible for the drivers on East Carleton to see cars in the curve that are going North, while attempting to make a left turn onto Cambridge. You must look left last to avoid oncoming traffic. This new project seriously increases this

5-3
(cont) | dangerous condition. I do not want you to rely on what I have said here, I want every traffic planner, city planner, city council and mayor to drive onto our street and then try to make a left turn onto Cambridge, even a right turn can be hazardous - then you will understand our concern. But be sure to look left last, because you cannot see cars in the curve and unsurprisingly many people drive very much faster than the speed limit on Cambridge.

5-4 | Instead of approving a General Plan Amendment to allow this small lot subdivision next to single family zoned property, the General Plan should be amended to prohibit small lot subdivision from being allowed next to R-1 zoning anywhere in the City of Orange. Such a General Plan Amendment would relieve other neighborhoods in Orange from the necessity of fighting this incompatible use in the future. There is not a homeowner in Orange that wants to live near 2 or 3 story residential units with or without roof top decks!

Sincerely,

James I. Garaghty
1011 E. Carleton Avenue
Orange, CA 92867
drjimbog@gmail.com

Individual Response 5 – James Garaghty (November 28, 2023)

- 5-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 5-2 The comment suggests the Project would cause noise and light pollution. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- Residential homes create new sources of light or glare, however the new light sources would have the same character and intensity as the existing surrounding light sources in the residential neighborhood to the north and lower intensity than the existing surrounding commercial light sources (see Draft IS/MND Page 24). Therefore, no significant impacts would occur from new light sources. Please refer to **General Response 2**.
- 5-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 5-4 The comment expresses the Commenter’s opinion about preventing a small lot subdivision from being allowed next to R-1 zoning anywhere in the City. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 6 – Schoen Tucker (November 28, 2023)

Monique Schwartz

From: Schoen Tucker <schoentucker@gmail.com>
Sent: Tuesday, November 28, 2023 9:48 AM
To: Monique Schwartz
Subject: 901 E Katella

[You don't often get email from schoentucker@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Ms Schwartz,

- 6-1 | Im not please to find out that the property at 901 E Katella will be change to residential status. Also, why where my neighbors not notified? I was the only one on my street who got a notice. I spoke with 2 of my neighbors yesterday.
I have lived at 841 E Hoover Ave, Orange for 22 years. There is no room for those houses on one small plot of land.
- 6-2 | Traffic after covid has been terrible. It is already difficult getting out of my street and driveway. They finally put signs up on the speed limit, but no one adheres to the 25 mph. On many occasions, I can see them while I am washing my dishes, in my kitchen window.
- 6-3 | Also, why do we need housing there. There are already lots of apartments and condos on Katella. The street is filled with cars parked on the street. Also, I understand that the Village will now get housing put on the property. This is a better area and larger size to fit the housing.

Thanks for you call back to the message I left.

Schoen Tucker

Individual Response 6 – Schoen Tucker (November 28, 2023)

- 6-1 The comment includes questions about public notification. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

- 6-2 The comment pertains to traffic. Please refer to **General Response 1**.

- 6-3 The comment suggests that housing is not appropriate on the Project site. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

The remainder of this page left intentionally blank.

Individual Comment Letter 7 – David Nelson (November 28, 2023)

Monique Schwartz

From: denrefce@aol.com
Sent: Tuesday, November 28, 2023 1:37 PM
To: Monique Schwartz
Subject: 901 E. Katella Ave.
Attachments: City Of Orange.docx

You don't often get email from denrefce@aol.com. [Learn why this is important](#)

Attached is my letter objecting to the proposed high-density single-family development at the subject location.

David Nelson
714-6395324
denrefce@aol.com

P.S. Please acknowledge receipt of the email.

City Of Orange

Attn: Monique Schwartz, Senior Planner

Subject: 901 E. Katella Ave.

7-1

I am David Nelson. I live at 1201 E. Carleton Ave. My wife and I have lived here for 55 years. While our house does not back up to the proposed development, we do strongly object to this high-density type of development at this location. We do however believe that getting rid of the abandoned phone building is a good idea, it is a maintenance eye sore.

7-2

I am a licensed Civil Engineer in California with over 50 years of experience in public works engineering including traffic engineering, design and construction. Our objections are many. First, the two and three-story houses will look down into the backyards of the houses they back up to the proposed project and destroy any privacy in the yards and back facing rooms. There is only a ten-foot proposed setback for the two-story houses backing up to the Carleton properties. The roof of the three-story houses is proposed as rooftop patios which will add to the intrusion.

7-3

Second, the proposed on-site packing of two car garages and 39 surface stalls, for guests is entirely inadequate and will force residents to use surface street in the surrounding area. Many of the owners may have more than two cars and also many garages may be filled so that only one or no cars can be parked inside. Our street already has cars parking on it from the Apartment building across Cambridge. The developer stated that the HOA would enforce onsite parking rules, I very much doubt that can be effective. Parking is not addressed in the Draft Negative Declaration.

7-4

Third the Draft Negative Declaration assumes that the average occupancy is 3 people per unit. With all these houses being three or four bedroom that would appear to be underestimated.

7-5

The fourth issue is traffic access to the site and its impact on existing streets. The proposed Cambridge access driveway is located on a curve and is opposite a left turn lane for southbound Cambridge on to Katella Ave. This turn lane is frequently backed-up past the proposed driveway location which will force cars exiting the site to turn right adding more traffic to an already bad problem for people exiting Carleton Ave. The sight distance is very poor as Carleton is at the inside of the s-curve. The amount of traffic on Cambridge has increased dramatically over the years and adding the new turns from the site will increase the danger. Also, the driveway on Katella will exit on to a major street and will be difficult to turn left.

Individual Response 7 – David Nelson (November 28, 2023)

- 7-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 7-2 The comment pertains to loss of privacy. Please refer to **General Response 2**.
- 7-3 The comment suggests the proposed parking is inadequate and parking was not address in the Draft IS/MND. Please refer to **General Response 1**.
- 7-4 The comment questions the use of 3 persons per dwelling unit in the Draft IS/MND. As stated in Section 5.14, Population and Housing, on Page 73 of the Draft IS/MND, the average household size in the City of Orange is 3.03 persons per household. Footnote Number 2 on Page 73 explains that this figure was obtained from the 2022 American Community Survey, prepared by the United States Census. The footnote also indicates that the 2022 figure is slightly lower than the 2019 figure used in the City’s Housing Element of 3.18 average persons per household.
- 7-5 The comment pertains to traffic. Please refer to **General Response 1**.

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Individual Comment Letter 8 – Jamie Fingal (November 29, 2023)

Monique Schwartz

From: Jamie Fingal <jamie.fingal@gmail.com>
Sent: Wednesday, November 29, 2023 6:34 AM
To: Monique Schwartz
Subject: 901 E Katella

Dear Monique:

Privacy is everything. Our neighborhood with 39 homes on a culdesac has been a safe haven for decades. A place to raise our kids. A safe place to play in the street with one another. To socialize as families, as moms, as couples. Girl Scouts walking the block with their wagon of cookies selling to our neighbors. Kids running down the street to find their friends to ride bikes, shoot baskets, and laugh, and scream and enjoy being part of a pack. Pool parties! People with kids and people without, the young, the old and everyone in between. We take care of one another. We have created a safe haven on our block.

8-1

We live in the middle. Our kids are all grown up now enjoyed these joys with their friends and when they come home, we keep on with our traditions of entertaining, pool parties, walking dogs, playing on the lawn and in all this we have our privacy.

I am deeply opposed to this project. I don't want to feel like we are always being watched from above. Why should our American Dream be cut short by a company who is in the business of making money OVER our what is best for us in our neighborhood, our kids and families?

I keep going to back to the language in the City of Orange's about home development:

Policy 1.2 Balance economic gains from new development while preserving the character and densities of residential neighborhoods.

Policy 1.6 Minimize effects of new development on the privacy and character of surrounding neighborhoods.

8-2

Privacy is important.

Jamie Fingal

1115 E Carleton Ave

I have lived on this street for over 35 years

Individual Response 8 – Jamie Fingal (November 29, 2023)

- 8-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 8-2 The comment expresses concern about privacy. Please refer to **General Response 2**.

The remainder of this page left intentionally blank.

Individual Comment Letter 9 – Kevin Tong (November 29, 2023)

Monique Schwartz

From: Kevin Tong <kevintong_email@yahoo.com>
Sent: Wednesday, November 29, 2023 9:46 AM
To: Monique Schwartz
Subject: Intracorp 901 Katella Project

You don't often get email from kevintong_email@yahoo.com. [Learn why this is important](#)

11.29.2023

City of Orange Design Review Committee
Attn: Monica Schwartz
re: Intracorp 901 Katella Project

Dear Ms. Schwartz,

9-1

My name is Kevin Tong, 13 year resident of 1126 E Carleton Ave. I moved to Orange for its small city atmosphere, for its small-town character and charm. I love its historical rich background. When I first bought my home on E Carleton, some of the homeowners on our street were original owners. I cherished that because it meant they valued our quiet neighborhood and street.

9-2

I am writing this letter in opposition to Intracorp to build a 49 unit high/medium density small lot subdivision adjacent to our R-1 zone property. If the city planners approve Intracorp's 901 Katella project, it will be going against the old town charm and attraction to living in Orange. I am not for development on that lot, just not 49 families moving in. This project will highly impact the traffic and parking situation on Carleton Ave. There are existing parking situations already on Carleton Ave near Cambridge. The people in the apartment complex living across the street are already parking on Carleton Ave. I am sure people from the proposed project will park on Carleton Ave also because there is no ample parking inside the complex. This will be a strain on our area residents, and especially on E Carleton.

9-3

Furthermore, traffic turning left on Cambridge into Katella is already a bad situation and having 5-6 cars slotted for turning left, it's going to get worse during with another 49 possible cars turning left onto Katella. The traffic safety and environmental impact concerns should be considered here.

9-4

Lastly, I enjoy my existing privacy and sanctuary of my home. I garden in my backyard and enjoy the tranquility. There currently is a large parking lot between my backyard and the commercial building. However, if this proposal goes through, having a 10 ft distance between our single story home and a towering 2 story complex will take that all away for every homeowner on my street.

9-5

This was AT&T old commercial property. Why is the city changing its zoning? It's very difficult to see the upside to this development. It creates more hazardous traffic and parking issues, takes away our privacy, creates more lighting and noise pollution and degrades Orange's old town neighborhood charm. For all these reasons, I will fight whole heartedly against this. Thank you in advance for your reconsideration.

Sincerely,
Kevin Tong

Individual Response 9 – Kevin Tong (November 29, 2023)

- 9-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 9-2 The comment expresses the Commenter’s opposition to the Project and focuses on parking concerns. Please refer to **General Response 1**.
- 9-3 The comment pertains to traffic concerns. Please refer to **General Response 1**.
- 9-4 The comment pertains to loss of privacy. Please refer to **General Response 2**.
- 9-5 The comment generally expresses opposition to the Project, but also references impacts to traffic, parking, privacy, lighting, and noise. For traffic and parking concerns, please refer to **General Response 1**. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.

Residential homes create new sources of light or glare, however the new light sources would have the same character and intensity as the existing surrounding light sources in the residential neighborhood to the north and lower intensity than the existing surrounding commercial light sources (see Draft IS/MND Page 24). Therefore, no significant impacts would occur from new light sources. Please refer to **General Response 2**.

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Individual Comment Letter 10 – Jenny Tom (November 29, 2023)

Monique Schwartz

From: Tom, Jenny <tomjc@hs.uci.edu>
Sent: Wednesday, November 29, 2023 6:41 AM
To: Monique Schwartz
Subject: Intracorp 901 Katella Project

You don't often get email from tomjc@hs.uci.edu. [Learn why this is important](#)

11.29.2023

Ms. Monique Schwartz
Senior Planner
City of Orange
Community Development Department Planning Division
300 E Chapman Ave.
Orange, CA 92866

Dear Ms. Schwartz,

10-1 | My name is Jenny Tom and have lived on 1126 E Carleton Avenue in Orange for 13 years. I am the third owner of this home. I have enjoyed living in my quiet, friendly old town historical neighborhood. All the single-family homes on our street were built in the 1960s and we have a number of neighbors that are original owners. I am writing this letter strongly against the proposed development of 49 new homes behind our houses on the corner of Cambridge and Katella Avenues. This building plan by Intracorp needs to be stopped because it was badly designed on a very busy street and intersection, is too close to our backyards, and will add long term traffic and parking congestion as well as privacy concerns for us single story homeowners. Let me start by saying that I am not against housing development. I know we have a housing crisis, and we built an ADU in our back yard to help with that. What I am against is a badly designed/proposed housing development in an originally commercial zoning space on a busy corner/intersection of our Orange neighborhood.

10-2 | I've noticed tall rental housing popping up all on Katella Avenue these several years... first the Garrison next to the Santa Ana River trail, and then the senior housing complex that is now being built behind our yards next to Smart and Final. Now they want to build another dense subdivision on this busy corner of Katella and Cambridge. When will these rezoning of commercial area properties to housing stop??? I feel we are especially targeted because our backyards are next to commercial properties on Katella. If these proposals continue, the old town charm of living in Orange will be gone, replaced by monolithic new high density housing towering over our single-family homes. We need to keep Orange a desirable place to live, and not comprise the character and charm of our neighborhoods and town.

10-3 | The 901 Katella project will create additional traffic and congestion that is already on a very busy street and intersection. We are surrounded by two schools, two busy gas stations, various shopping centers and the Honda Center in this vicinity. On the weekends, there are soccer tournaments at the fields next to the schools on both sides of Cambridge Avenue. Katella and Cambridge are already such busy streets and adding a housing unit on that corner will just add to the chaos. For me and my neighbors, making a left turn out on East Carleton is already so difficult. I cringe every morning when I drive to work because it is so hard to make a left turn with oncoming traffic on both sides of Cambridge. People are not driving the speed limit and there is a blind curve. I cannot imagine adding more fast-moving cars to this congestion with this proposed development. It is a hazard for all the owners and families with children on our street.

10-4 | The traffic study for the project was done was back in 2020 during Covid, so it should not be even considered. Traffic safety and environmental impact should be a priority when planning development. Second, the project will cause more people to park on our street. We have tenants of Cambridge Court opposite of us that already do park on our street in the evenings. It will be sad if we need to issue a City of Orange permit to park on our own street. Thirdly, having these

10-6 | homes built within only 10 ft of our backyards will cause much noise and light pollution as well as privacy concerns. Who

10-6
(cont) | wants anyone peeping at you and your backyard from 3+ stories and just 10 ft from you? Would you want such a neighbor next to you?

10-7 | In closing, please reconsider and stop the proposed Intracorp 901 Katella project. The proposal is badly designed, planned, and developed. Please do not approve such a faulty planned project in our Orange neighborhood. We should not be rezoning commercial area spaces to high density housing in our Orange neighborhoods. Please keep Orange desirable to live and work with its old town charm and character. Thank you in advance for your consideration.

Sincerely,

Jenny Tom

Individual Response 10 – Jenny Tom (November 29, 2023)

- 10-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 10-2 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 10-3 The comment pertains to traffic concerns. Please refer to **General Response 1**.
- 10-4 The comment suggests that the traffic study was prepared during Covid. Please refer to **General Response 1**.
- 10-5 The comment expresses concern about parking. Please refer to **General Response 1**.
- 10-6 The comment expresses concern about noise and light pollution as well as privacy. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- Please refer to **General Response 2**.
- 10-7 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 11 – Timothy Chi Ngo (November 30, 2023)

Monique Schwartz

From: tngo <hoangsa@gmail.com>
Sent: Thursday, November 30, 2023 10:51 AM
To: Monique Schwartz
Subject: Pour planning at 901 E. Katella Ave. Parcel.

You don't often get email from hoangsa@gmail.com. [Learn why this is important](#)

Dear Ms Schwartz,

11-1

My name is Timothy Chi Ngo, I am living at 1243 E. Vanowen Ave in Orange, California since June 12, 1979 with my wife and two children. I am writing this email to express my opposition to the planning of your Department with Intracorp to build a high density small subdivision at the location now: 901 E. Katella Ave. This parcel is still unoccupy for more than few year.

11-2

The reason I am opposing to this project is:

1/- The size of the parcel is small (only 2.71-acre) to build total 49 units of houses from 12 Two-story homes to 37 three-story homes with top deck open as a balcony.

2/- This project if materialized, will creating a havoc on the street of Cambridge/Katella and surrounding streets of four sides as well. And for sure it will change the nature of this corner to the worse ever. I

11-3

remember the accident around 15 year ago of my uncle who had lived on 917 E. Vanowen Ave. when he made a left turn from E. Vanowen ave. to the south bound of Cambridge. His car had been hit by another oncoming traffic and he's been seriously injure by that accident. The traffic from this new place will be a mess and very dangerous for the residents of this area as a whole.

11-4

3/- Not counting the cars from this new development will pour out and park on nearby small streets like Carlton, Vanowen, Trenton on the north side of Katella, but either on the south side of Katella as well...

11-5 | 4/- This parcel is a very small commercial piece of land and adjacent to the large and quiet residential area, so it could not be suitable to place a large number of housing as dictated in the rezoning statement.

11-6 | 5/- Not counting the noise, the influx of people into a small area will definitely create a terrible living condition for those people. They will be a burden for the City of Orange Police Department to come...

6/- And with more unforeseen problems should arrived in the future...

11-7 | Therefore, Instead of approving a General Plan Amendment to allow this small lot subdivision next to single family zoned property, the General Plan should be amended to prohibit small lot subdivision from being next to R-1 zoning anywhere in the City of Orange territory. Such actions would relieve other neighborhoods in this city to unnecessarily fight this incompatible use in the future. I would guarrantive to let you know that there will not wny homeowner in this city who wants to live next to 49 units of two and three stories housing with top roof decks opening above!!!

I hope that my concerns will be considered,
Thankyou for your help.

Best Regards,
Timothy Chi Ngo

Individual Response 11 – Timothy Chi Ngo (November 30, 2023)

- 11-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 11-2 The comment suggests the parcel size is too small to build 49 units. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 11-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 11-4 The comment pertains to parking concerns. Please refer to **General Response 1**.
- 11-5 The comment expresses concern that the project site is not suitable for residential development. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 11-6 The comment suggests the Project will be a burden on the Orange Police Department. The potential impacts on Public Services, including the Orange Police Department was analyzed in Section 5.15 of the Draft IS/MND (see Page 76). The analysis determined that the proposed Project would not cause a significant impact to the Orange Police Department or require any additional staffing.
- 11-7 The comment expresses the Commenter’s opinion about preventing a small lot subdivision from being allowed next to R-1 zoning anywhere in the City. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 12 – David and Linda Crawford (November 30, 2023)

From: linda1crawford@yahoo.com
Sent: Thursday, November 30, 2023 6:27 PM
To: Monique Schwartz
Subject: Proposed Housing Development on Corner of Katella & Cambridge

You don't often get email from linda1crawford@yahoo.com. [Learn why this is important](#)

Dear Ms. Schwartz,

We're writing this letter to express our concerns about the housing development under consideration on the corner of Katella and Cambridge in Orange. We know housing is needed, but this small lot for 49 homes is not the answer.

12-1 We have lived here at 1229 East Carleton Ave. in Orange for 52 years. There have been many changes in the area during those years, but there has been nothing that impacts our street as much as this new development would. When we were house hunting, we looked at some single story homes that had two story homes next door. We noticed that from the second story windows the backyard of the house next to it could be seen. We decided that a single story home with **some second story homes next to it would take away our privacy.** Our home is the 35th home we looked at, and we have loved it for many years. However, after several years and a growing family, we built a second story over our attached garage making sure that our **neighbors still had their privacy.**

12-2 After looking at the specifications for the proposed development, we could see that 49 houses on the proposed small two (2) acre lot was not a good use of land. The complex with third story rooftop decks would interfere with the privacy of the people behind on East Carleton. Lights, noise, and a view of backyards **would not insure the privacy we have been able to enjoy. A second story complex of homes only ten (10) feet from the wall shared by our neighbors on East Carleton does not insure privacy either.** Also, this housing development could add a lot of traffic to the area. There is already a Senior Living complex under construction with many units in close proximity to the proposed development, also on Katella. Having quiet businesses in that area have not taken away from our privacy, as the set back of the buildings from the wall is a good distance leaving parking lots near the wall. These businesses have not added significantly to the traffic.

12-3 Entering and leaving East Carleton would be more difficult with the probability of more people entering and exiting throughout the day from the proposed project than has been before. **It would be difficult and dangerous for people using Cambridge or Katella to exit or enter the proposed complex of homes. There is a blind curve on Cambridge, and Katella is an extremely busy street.** It would also be inconvenient for so many people living in such a small area to have only one entrance/exit. Lastly, it would be difficult for emergency vehicles used by paramedics and firemen to access the home in need. We, would never consider living in such a "sardine" situation.

12-4 We feel a small lot subdivision should not be allowed next to a single family zoned property. The proposed site is zoned for (light) commercial use and should remain so. Thank you for considering our concerns.

Sincerely,

Dave and Linda Crawford
1229 E. Carleton Ave., Orange

Individual Response 12 – David and Linda Crawford (November 30, 2023)

- 12-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 12-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 12-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 12-4 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 13 – Denise Floryan (November 30, 2023)

From: myszka_1046@yahoo.com
Sent: Thursday, November 30, 2023 2:57 PM
To: Monique Schwartz
Subject: Design Project No. 5092-22 Intracorp Residential Project

You don't often get email from myszka_1046@yahoo.com. [Learn why this is important](#)

13-1 | My name is Denise Floryan and have lived at 1046 East VanOwen Avenue, Orange for 45 years. I strongly oppose the application by Intracorp to build high density, small lot subdivision adjacent to my R-1 zone property.

13-2 | While I realize additional housing is needed, but putting 49 units on two acres of property consisting of 12, 2-story units ten feet from my neighbors fences and allowing 37, 3-story units with 37 roof top decks less than 50 feet from single family homes is clearly an invasion of our privacy. Giving the developer the density he needs building an inappropriate project on this 2 acre parcel is the definition of an incompatible use.

13-3 | The traffic problems inherent to this project as well as safety issues demonstrate how incredibly poorly designed this project is. Clearly, the General Plan Amendment allowing this small lot subdivision next to single family property, should be amended to prohibit small lot subdivisions from being allowed next to R-1 zoning anywhere in Orange. This would relieve other neighborhoods in Orange from having to fight this incompatible use in the future.

13-4 | No homeowner in Orange wants to live next to 3 story residential units with roof top decks!!!!

Individual Response 13 – Denise Floryan (November 30, 2023)

- 13-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 13-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 13-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 13-4 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 14 – Alex Martin (December 1, 2023)

Monique Schwartz

From: Alex Martin <alexmamamartin@gmail.com>
Sent: Friday, December 1, 2023 1:10 PM
To: Monique Schwartz
Subject: Re: 901 East Katella Ave property build proposed

You don't often get email from alexmamamartin@gmail.com. [Learn why this is important](#)

Dear Ms. Schwartz,

14-1

My name is Alex Martin. I live on 1046 East Carleton Ave Orange 92867. I am writing to you on the behalf of my concerns with the proposed property on 901 East Katella Ave design review no 5092-22. Before I get started on the property proposed I would like to introduce my family and our long term relationship with Orange. I'm married to Sean Martin, we have a 3.5 year old son and another son on the way in May. We live directly behind the new proposed development. I am a hairstylist and my husband is a refrigerator supervisor. We have been together for 12 years. We bought our house 3 years ago. Sean grew up in Orange and went to Salem Luthern and Orange Lutheran. Before moving here, he would take me to all his favorite places to eat and explore in Orange. We would spend all of our date nights in Orange. We saved for over 5 years to buy our first house. We knew when we bought our first house we wanted it to be in Orange because of the amazing community and family environment. We picked the house we live in for so many reasons and researched a lot before buying our home. We love that it's on a cul-de-sac for our kids to play, also less traffic with that too. We love how quiet it is and the kids play in the street like we did as kids. We have become very close with a lot of our neighbors and it's been just what we wanted for our family. We also love going to all the events at the circle and all the great community Orange offers. Everyone is so nice and welcoming. I would love to see the property behind us developed into something great for the community. With being a direct neighbor behind this proposed property and knowing this area, I have a number of concerns with the proposed property.

14-2

First off, I don't think it's appropriate to have homes 2 story only 10 feet from our wall especially without any raising of our wall. If we were to add on and make our house a 2 story we have to have a 20 feet setback, the same rule should apply to the new buildings. My son loves to run around in the sprinklers naked, and I don't want to have to worry about our privacy being compromised from these new buildings. Also the 3 story units proposed with a rooftop decks will also be an huge invasion of privacy. It's not just one house that can look into our backyard, but all the 3 store units with rooftop decks as well as the houses with 2 story windows. Not to mention all these units so close to us will block sunshine and the beautiful skyline for my kids.
I'm

14-3

My second concern is the traffic. Cambridge is curvy and really hard for us to turn out of already because of the curvy road. It's a blind spot for us coming out and speeding cars coming down it. During traffic hours, it is especially challenging to turn out of our street with the blind curves. With 49 units - a minimum of 100 cars, the traffic will increase tremendously. The left turn lane from Cambridge onto Katella already backs up as it is. I saw the approved traffic notice for this property was from July 2020. That doesn't make sense to me to have that being the timeline during summer and a pandemic. I definitely think traffic needs to be re-evaluated and also to evaluate how that great increase of cars will affect my street as well.

14-4

My third concern is parking. With 49 houses and only 30 guest parking spots, we are the closest street for extra parking and we will get a lot of their overflow parking. Especially since the proposed properties don't have driveways or street parking for them to park on, if they fill their garages with storage, then they will park in the guest parking spots. Yes currently it states they will have to park in their garage but as we've found out after 2 years the HOA can change the rules for parking and allow parking other areas. We also already get cars parking on our street from the Cambridge apartments, so this will make it much worse. Also, the very most importantly it will add alot more traffic where our kids play.

14-5 • My fourth concern is this proposed 49 units doesn't fit it and make sense of our quaint, quiet neighborhood. We really researched neighborhoods to get that family friendly atmosphere and these properties will make it more New York style, not the part of Orange we moved into.

14-6 Fifth, we have expressed our concerns to the builder. He doesn't want to compromise at all, and has told different things to different neighbors. We have actually caught him in multiple lies, and when we ask him questions- he just doesn't answer them and just dances around the questions. I have clients that are developers for a living and they always listen and compromise with the current neighbors somewhat. At the meeting he hosted for us, he didn't write any concerns down and didn't have empathy for any of our concerns either. He also mentioned at the meeting we had with him that the original plans had even more houses and only one entry/exit area. He expected over 100 cars to exit during traffic hours at the same area- it's so obvious he is only in this for the money and not looking out for the current neighbors as well as the people to move into these houses. He also compared this property to be exactly like his new build in Tustin. The Tustin location he is referring to, on one side lines an apartment complex, that has parking and garages and much more space between the properties for privacy of the apartments. It does not compare to this proposed 10 foot setback with rooftop decks at all. He even told some of our neighbors this is a done deal and it is not. It is even proposed to have the houses on Katella be only 10 feet from the sidewalk to their front door. The builder is also aware of the homeless problem on that corner and it doesn't make sense for the new home owners to deal with that so close to their front doors.

14-7 Sixth, it will lower our property values. I wouldn't have purchased my house with windows and rooftop decks facing my yard to see my kids play with high traffic and crowded cars street. Also, when you look at my house from the front you will then see these huge 2 and 3 story houses behind towering over.

Seventh, this build goes against multiple points in the Orange general plan LU-4.

14-8 Policy 1.4: Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development.

Policy 1.6: Minimize effects of new development on the privacy and character of surrounding neighborhoods.

Policy 6.10: Mitigate adverse air, noise, circulation, and other environmental impacts caused by new development adjacent to existing neighborhoods through use of sound walls, landscaping

14-9 I understand this has been underway for a while but it is very disappointing that we as the residents, who it will effect the most, get 1 month to do research on over a thousand of pages on the Orange website during the holidays to defend ourselves in this situation, when we are the ones that live here and it will effect the most. I really would love to see this land developed but I think the builder is just trying to get as much bang for his buck instead of actually researching, listening to neighbors and doing what's best for our community.

It would make way more sense to build 20-24 one or two story homes, with a 20 foot setback from our property. He told us he wanted to sell each home starting at 700,000. He could easily build bigger ranch style homes, like ours on our street and sell them for 1,500,000 and up. He would still get the price point he is looking for. It would make more room for their guests to park, give them driveways and street parking, less traffic, and fits into our community. I would also recommend with the homeless problem on that corner, as well as the bus stop that the new housing be gated as well. Another option for a new development would be a row of food options, like the Anaheim packing house or Santa Ana's 4th street market. Orange doesn't have anything like that and it would drive a lot of business to our city.

We really are so lucky to have purchased a house in Orange and we love our neighborhood so much and I really want what's best for our community and neighbors and if we allow this next to our homes I fear more will be added to the city and change the entire beautiful city we live in.

Please let me know you received my email.
Thank you very much for your time,
Alex Martin

Individual Response 14 – Alex Martin (December 1, 2023)

- 14-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 14-2 The comment expresses concerns about privacy. Please refer to **General Response 2**.
- 14-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 14-4 The comment pertains to parking concerns. Please refer to **General Response 1**.
- 14-5 The comment expresses concerns about compatibility. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 14-6 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 14-7 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 14-8 The comment suggests that the Project is inconsistent with General Plan policies 1.4, 1.6, and 6.10. Policies 1.4 and 1.6 pertain to design and privacy. Please refer to **General Response 2**. Policy 6.10 states that impacts to air, noise, circulation should be mitigated through the use of sound walls, landscape buffers, speed limits, and other traffic control measures. The Draft IS/MND analyzed impacts to Air Quality (Section 5.3, Page 28), Noise (Section 5.13, Page 67) and Transportation/Traffic (Section 5.17, Page 81). The Draft IS/MND determined that no significant impacts and no mitigation measures are required for Air Quality and Noise impacts. The Draft IS/MND determined that the proposed Project would not cause a traffic impact to surrounding streets or intersections with implementation of one mitigation measure. Please refer to **General Response 1**.
- 14-9 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

Individual Comment Letter 15 – Joann Jeon (December 2, 2023)

From: Joann Jeon <joannjeon@gmail.com>
Sent: Saturday, December 2, 2023 8:21 PM
To: Monique Schwartz
Subject: Concerns regarding Residential Project by Intracorp on Katella Ave and Cambridge St

You don't often get email from joannjeon@gmail.com. [Learn why this is important](#)

Dear Mrs. Schawartz:

My name is Joann Jeon and I live at 932 E Carleton Ave in Orange, A. I live here with my family and we joined this beautiful neighborhood about 2 years ago.

I am writing this email to you to express my opposition to the application by Intracorp to build a high density small lot subdivision adjacent to our R-1 zone property.

I am not opposed to the construction of additional housing. We all know we need additional housing, but the primary purpose of zoning laws is to separate incompatible uses of property. Putting 49 units on two acres of property consisting of 12 two story units ten feet from my fences and allowing 37 three story units with 37 roof top decks, which can be lighted and used day and night less than 50 feet from our single story homes, is an invasion of privacy in both our front and back yards, which will also create substantial noise and light pollution. My house is adjacent to the gate entering the lot and no amount of fence will provide me and my family the privacy we deserve living in this house. In short, this project on this parcel of land is the definition of an incompatible use.

This project also creates serious traffic problems and additional dangers to the residents of E Carleton Ave, as Cambridge St adjacent to the AT&T property is incredibly poorly designed. There is a curve in the road that makes it impossible for the drivers of E Carleton to see cars in the curve that are going North, while attempting to make a left turn onto Cambridge. You must look left last to avoid oncoming traffic. This new project seriously increases this dangerous condition. I do not want you to rely on what I have said here, I want every traffic planner, city planner, city council, and mayor to drive onto our street and then try to make a left turn onto Cambridge - then you will understand our concern.

Instead of approving a General Plan Amendment to allow this small lot subdivision next to single family zoned property, the General Plan should be amended to prohibit small lot subdivision from being allowed next to R-1 zoning anywhere in Orange. Such a General Plan Amendment would relieve other neighborhoods in Orange from the necessity of fighting this incompatible use in the future. There is not a homeowner in Orange that wants to live next to 3 story residential units with rooftop decks.

Please take the time to reconsider this project as the project will bring many critical problems to our neighborhood. Thank you for your time.

Sincerely,
Joann Jeon

Individual Response 15 – Joann Jeon (December 2, 2023)

- 15-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 15-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 15-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 15-4 The comment expresses the Commenter’s opinion about preventing a small lot subdivision from being allowed next to R-1 zoning anywhere in the City. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 16 – Amy Moen (December 2, 2023)

Monique Schwartz

From: Amy Moen <amymoen@gmail.com>
Sent: Saturday, December 2, 2023 8:59 PM
To: Monique Schwartz
Subject: Proposed Development on the corner of Katella and Cambridge

You don't often get email from amymoen@gmail.com. [Learn why this is important](#)
December 2, 2023

Dear Ms. Schwartz,

16-1 | My name is Amy Moen. I, along with my husband, and six children have lived at 1239 E. Carleton for over 10 years. Four of our children have only ever lived in our current house.

I am writing in regards to the proposed housing development on the Northeast corner of E. Katella Avenue and N. Cambridge street. While there may be some benefits to the city of Orange I think the cost and drawbacks would be greater. As a resident of the city of Orange I have several concerns about this project.

- 16-2 | 1.
- 2.
- 3. Ten foot setbacks with houses that are two and three stories high and that have rooftop
- 4. patios would take away privacy for the houses on the south side of E. Carleton Avenue. One wants to be able to enjoy their private backyard without thinking that someone from a much higher house can easily peer into their backyard.
- 5.
- 6.
- 7.
- 16-3 | 8. The guest parking that is on the proposed plan is not adequate. If anyone were to host
- 9. a large family gathering or party at their house (perhaps hosting for a holiday), the guests would have to park on Carleton. This takes away guest parking for the already existing homeowners on Carleton. As it is now, residents of the apartment complex on
- 10. Cambridge, park on Carleton.
- 11.
- 12.
- 13.
- 16-4 | 14. While the development will be managed by a Home Owners Association, it is well known
- 15. that HOAs commonly vote and change rules to benefit themselves, therefore any HOA policies cannot be a guarantee of protection of benefits for the current residents on E. Carleton Ave.
- 16.
- 17.
- 18.
- 16-5 | 19. The housing development will most likely impact my home's value. A neighborhood that
- 20. is right next to a small lot neighborhood is less desirable. The increased traffic congestion will also have an effect on the value of my home.
- 21.
- 22.
- 23.
- 16-6 | 24. Forty-nine new residences in that space would most likely lead there to be at least 100

16-6

- 25. new cars exiting onto Katella and Cambridge. Katella is already a busy street and the 100 more vehicles would contribute to greater traffic congestion, more pollution and more wear and tear on the roads. This is also a safety concern as it will make it more
- 26. difficult for residents on E. Carleton Ave to turn on Cambridge with the increased amount of cars on the road.

- 27.
- 28.
- 29.

16-7

- 30. Finally leaving our street will be a lot less safer with so many new cars leaving the
- 31. development. We will no longer be able to turn left out of our street which will cause us to have to commute longer and it will increase traffic in the streets north of Carleton Ave as many people will have to turn around on those streets in order to go east

- 32. on Katella and to the freeway.
- 33.

I appreciate your time to read this letter and consider my opposition to this development.

Thank you,
Amy Moen

Individual Response 16 – Amy Moen (December 2, 2023)

- 16-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 16-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 16-3 The comment expresses concern about parking. Please refer to **General Response 1**.
- 16-4 The comment suggests that HOAs can change rules after the CC&Rs are recorded. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 16-5 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 16-6 The comment pertains to traffic. Please refer to **General Response 1**.
- 16-7 The comment pertains to traffic. Please refer to **General Response 1**.

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Individual Comment Letter 17 – Karen Goran (December 3, 2023)

Monique Schwartz

From: karen goran <karengoran@att.net>
Sent: Sunday, December 3, 2023 9:26 AM
To: Monique Schwartz
Subject: katella/cambridge proposed development

You don't often get email from karengoran@att.net. [Learn why this is important](#)

Dear Ms. Schwartz,

- 17-1 | My name is Karen Goran and I have lived/owned 918 E Vanowen ave in Orange for over 20 years. I would like to voice my opposition to the proposed development at the old AT& T building on the corner of Cambridge and Katella. While I'm all for additional housing and would love to see that vacant building put to use, 49 units on 2 acres of property seems extremely excessive. Packed in like sardines comes to mind. There is already tenant overflow parking on the streets from the apartment complex across the street and adding another 49 homes would push more people to park in the surrounding residential areas.
- 17-2 | Traffic around that curve exiting Carleton on to Cambridge already makes it almost impossible to safely exit Carleton. My daughter's babysitter lived on Carleton and I always dreaded that turn onto Cambridge for fear of someone flying around that corner. Imagine another 100 or so people using that street!?! It's an accident waiting to happen.
- 17-3 | I love my little home on Vanowen and worry that the property value would plummet if that many new residences are added so close to me. Surely a smaller, more reasonable number of residences would still be profitable for that space. I don't want to look up and see people on their 3rd floor patio looking into my back yard.
- 17-4 | This is not a high density housing neighborhood. It doesn't belong here and re-zoning to change that isn't fair to the people who already live here.

Respectfully,

Karen Goran,
concerned property owner.

Individual Response 17 – Karen Goran (December 3, 2023)

- 17-1 The comment expresses concern about parking. Please refer to **General Response 1**.
- 17-2 The comment pertains to traffic. Please refer to **General Response 1**.
- 17-3 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 17-4 The comment expresses concern about privacy. Please refer to **General Response 2**.

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Individual Comment Letter 18 – Hung Doan (December 3, 2023)

Monique Schwartz

From: Hung N Doan <hung2502@yahoo.com>
Sent: Sunday, December 3, 2023 9:41 PM
To: Monique Schwartz; dan@danslater.com
Subject: Opposition to Intracorp's Application for High-Density Small Lot Subdivision - 901 E Katella Ave

You don't often get email from hung2502@yahoo.com. [Learn why this is important](#)

Dear Ms. Schwartz, Mr. Slater,

18-1 | I am Hung Doan, a resident of 1138 East Carleton Avenue in the City of Orange for almost a decade. I am writing to express my strong opposition to the application by Intracorp to construct a high-density small lot subdivision adjacent to our R-1 zoned property, located at 901 E Katella Ave (APN 375-461-41).

18-2 | While recognizing the need for additional housing, the proposed development of 49 multistory units on a 2-acre lot, with units positioned 10 feet from existing common walls, infringes upon the privacy of current residents on East Carleton Ave. Such proximity raises concerns about privacy invasion, substantial noise, and light pollution, adversely affecting the well-being and tranquility of the neighborhood.

18-3 | The inclusion of 37 rooftop decks appears driven solely by the developer's pursuit of profits, disregarding the negative impacts on the surrounding community, including increased traffic, noise, blocked views, compromised privacy, parking issues, and potential devaluation of properties. This project epitomizes an incompatible land use, exemplifying the developer's profit-centric approach at the expense of residents' quality of life.

18-4 | Furthermore, the proposed development exacerbates existing traffic challenges and safety risks on East Carleton Avenue and Cambridge Street. The road curvature near the property at 901 E Katella Ave creates visibility issues for drivers making left turns onto Cambridge, especially when vehicles are approaching from the north. This project intensifies this hazardous condition, necessitating a thorough evaluation by traffic planners, city planners, city council, and the mayor. A firsthand experience of attempting a left turn onto Cambridge will underscore the gravity of our concerns.

18-5 | Rather than endorsing a General Plan Amendment to permit this small lot subdivision adjacent to single-family zoned property, I advocate for amending the General Plan to prohibit such subdivisions near R-1 zoning throughout Orange. Such an amendment would proactively protect other neighborhoods from similar incompatible developments in the future, relieving them from the arduous task of opposing such projects.

It is my sincere hope that the City acts in the best interest of its law-abiding citizens. Your attention to this matter is crucial in preserving the harmony and well-being of our community.

Best regards,

Hung Doan
1138 E Carleton Ave, Orange, CA

Individual Response 18 – Hung Doan (December 3, 2023)

- 18-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 18-2 The comment references three topics, privacy, noise, and light pollution. Regarding privacy and light pollution concerns, please refer to **General Response 2**. Regarding noise, a Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 18-3 The comment references concern over traffic, noise, blocked views, privacy, parking, and devaluation of property values. Please see Response to Comment 18-2 regarding noise. Please refer to **General Response 1** regarding traffic and parking concerns. Please refer to **General Response 2** regarding privacy concerns. Regarding views, there are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts. Furthermore, private views are not protected. Lastly, the comment suggests that the Project will lower the value of the Commenter's home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 18-4 The comment pertains to traffic. Please refer to **General Response 1**.
- 18-5 The comment expresses the Commenter's opinion about preventing a small lot subdivision from being allowed next to R-1 zoning anywhere in the City. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 19 – Kevin O’Connor (December 4, 2023)

Best,
Kevan O’Connor

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Kevan Patrick O’Connor, M.B.S.
Kevanpatrickoconnor@gmail.com | 714.393.1834

Individual Response 19 – Kevin O’Connor (December 4, 2023)

- 19-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 19-2 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 19-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 19-4 The comment expresses concern about parking. Please refer to **General Response 1**.
- 19-5 The comment expresses concern about Chapman university students overpopulating the dwellings and having large parties. The City’s Municipal Code provides an enforcement mechanism to regulate large parties and noise events. Furthermore, the future Homeowners Association has the ability to enforce Codes, Covenants, and Restrictions (CC&Rs) that generally also address parties and overcrowding. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 19-6 The comment states that the Project would have a high skyline and impact the beauty of the area. The proposed Project would be subject to the small lot subdivision ordinance height limit of 35 feet. The existing E. Carleton neighborhood has a height limit of 32 feet, as does the existing C-P zoning on the Project site. Therefore, the proposed Project would not substantially change the permitted height. Please refer to **General Response 2** for more information. Additionally, there are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts.
- 19-7 The comment provides a suggestion to add more parks and trails within the vicinity of the Project site. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 20 – Adam Le (December 4, 2023)

Monique Schwartz

From: Adam Le <adamhle@hotmail.com>
Sent: Monday, December 4, 2023 4:05 PM
To: Monique Schwartz
Subject: 901 Katella Letter

You don't often get email from adamhle@hotmail.com. [Learn why this is important](#)

Dear Ms. Schwartz,

20-1 | My name is Adam Le and I have lived at 1116 E Carleton Ave in Orange, CA for 23 years. I am writing this email to you to express my opposition to the application by Intracorp to build a 49 unit high/medium density small lot subdivision adjacent to our R-1 zone property.

20-2 | This project will be a first of its kind in Orange that is immediately adjacent to single family homes without any barriers or adequate spacing to provide any privacy. This proposed change in zoning to allow such structures to be built will set a bad precedent that other neighborhoods will have to fight. The builder wants to only provide a 10 foot setback immediately behind the existing single story homes. This does not adhere to the City of Orange's General Plan Land Use, specifically:
Policy 1.4: Ensure that new development reflects existing design standards, qualities and features that are in context with nearby development.
Policy 1.6: Minimize effects of new development on the privacy and character of the surrounding neighborhoods.
Policy 6.10: Mitigate adverse air, noise, circulation, and other environmental impacts caused by new development adjacent to existing neighborhoods through use of sound walls, landscaping buffers, speed limits, and other traffic control measures.

20-3 | No amount of shielding can protect the current homeowners to ensure their privacy as evidenced by the backyard pictures of some neighbors (with their permission). A home is supposed to be a sanctuary and no person will want to come home to a 2-3 story structure in their backyard looking down on them affording zero privacy both inside and outside the home.

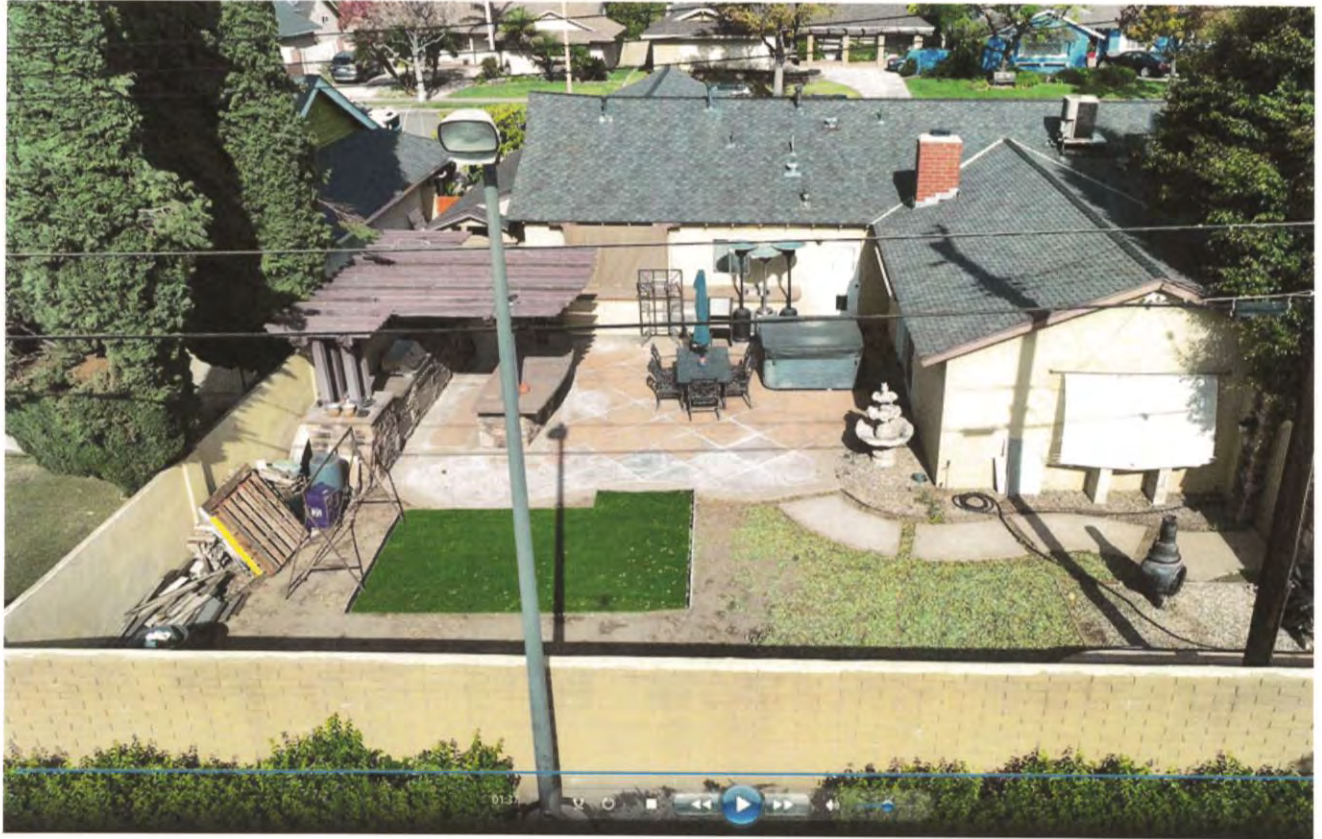
20-4 | I know there is a need of additional housing and I am not opposed to the construction of such new housing. However, construction of new housing should allow both the current and new residents to have some privacy from each other. All of the current new builds (including the current one by Intracorp in Tustin) are either self-contained or separated by a large parking area 30-50 feet away from each other. Please reconsider and not approve the plan by Intracorp to build these homes only 10 feet away from the back wall of my neighbor's homes.

Thank you for your time and consideration.

Sincerely,

Adam Le





Individual Response 20 – Adam Le (December 4, 2023)

- 20-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 20-2 The comment suggests that the Project is inconsistent with General Plan policies 1.4, 1.6, and 6.10. Policies 1.4 and 1.6 pertain to design and privacy. Please refer to **General Response 2**. Policy 6.10 states that impacts to air, noise, circulation should be mitigated through the use of sound walls, landscape buffers, speed limits, and other traffic control measures. The Draft IS/MND analyzed impacts to Air Quality (Section 5.3, Page 28), Noise (Section 5.13, Page 67) and Transportation/Traffic (Section 5.17, Page 81). The Draft IS/MND determined that no significant impacts and no mitigation measures are required for Air Quality and Noise impacts. The Draft IS/MND determined that the proposed Project would not cause a traffic impact to surrounding streets or intersections with implementation of one mitigation measure. Please refer to **General Response 1**.
- 20-3 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 20-4 The comment expresses concern about privacy. Please refer to **General Response 2**.

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Individual Comment Letter 21 – Carolyn Jones (December 4, 2023)

Monique Schwartz

From: Jones, Carolyn <carolyn.jones1@eagles.cui.edu>
Sent: Monday, December 4, 2023 8:53 PM
To: Monique Schwartz
Subject: Carleton Avenue Homes & Proposed Development

You don't often get email from carolyn.jones1@eagles.cui.edu. [Learn why this is important](#)

Dear Ms. Schwartz,

21-1 My name is Carolyn Jones and I live at 1014 E. Carleton Ave in Orange, CA. I have lived in my home along with my husband, Jeff, and our two daughters on this street for over 13 years.

I am writing this email to you to express my strong opposition to the application by Intracorp to build a high-density small lot subdivision adjacent to our R-1 zone property/neighborhood. I strongly urge you to reconsider this project. As a resident of the city of Orange since 1983, I am deeply concerned about the impact this high-density development will have on our community and neighborhoods. I urge you to reconsider this project for numerous reasons.

21-2 **1. Support for Responsible Development:** I am not opposed to the construction of additional housing and the support for responsible development in our community. It's important to note that our community understands the need for housing development to accommodate the growing population. We are not opposed to progress and additional housing opportunities. However, it is imperative that any new development aligns with the existing infrastructure and respects the character of our neighborhood. Responsible development should prioritize the well-being and needs of current residents while also meeting the demand for housing.

21-3 **2. Concerns about incompatible use of Property:** The proposed high-density housing units represent an incompatible use of the property in question. The nature and scale of the planned development do not align with the current use of the land and the surrounding neighborhood. Such a project could disrupt the established harmony and functionality of the area, potentially leading to a decline in the overall livability of our community. Placing 49 units on two acres of property consisting of 12 two-story units, 10 feet from our wall and neighbors, in addition, to building 37 three-story units with rooftop decks is an incompatible use of property. The rooftop decks are an invasion of privacy in both our front and back yards and create increased noise and light pollution.

21-4 **3. Respect for Zoning Laws Intent:** Zoning laws exist to ensure the orderly development of communities, protect property values, and maintain a suitable living environment for residents. The primary purpose of these regulations is to balance the need for growth with the preservation of existing neighborhoods' integrity. Any proposed development should adhere to these zoning laws and regulations to preserve the quality of life and character of our community in Orange.

21-5 **4. Overcrowding and Strain on Infrastructure:** The addition of high-density housing will likely strain our local infrastructure, including roads, schools, utilities, and emergency services. Our neighborhood is not equipped to accommodate such an influx of residents without substantial upgrades, leading to potential safety hazards and reduced quality of life for current inhabitants. This project creates significant traffic issues and poses a danger to the residents of East Carleton Avenue. Cambridge Street
21-6 adjacent to the AT&T building is poorly designed with a curve leading up to Carleton Avenue. Many

21-6

drivers ignore the warning flashing yellow lights as they approach the curve and continue to speed on Cambridge. The curve on the road increases the difficulty of seeing cars in the curve going north on Cambridge as drivers attempt to turn left onto Cambridge. I would encourage the traffic planner, city planner, city council members and Mayor to experience this drive as it lessens the visibility of other cars.

21-7

5. Decrease in Property Values: High-density housing developments often negatively impact property values in surrounding areas. This concern is shared by many residents who have invested in homes in this neighborhood and wish to protect their property values.

21-8

6. Impact on Solar Efficiency: Many residents in our neighborhood have invested in solar panels to reduce their carbon footprint and energy costs. The proposed high-density homes could cast shadows and obstruct sunlight, significantly reducing the efficiency of these solar installations. This obstruction not only affects the economic benefits of solar energy but also undermines our collective efforts toward sustainability and renewable energy. As a homeowner, we have invested in solar energy and the high density development affects our ability to harness clean energy efficiently.

21-9

7. Lack of Privacy Measures: The current building plans for the proposed two-story and three-story high-density units do not include provisions for shielding walls or the planting of high privacy hedging/trees. These elements are essential for maintaining the privacy and visual separation between existing residences and the new development. The absence of such measures exacerbates our concerns about privacy invasion and the loss of a peaceful residential environment. The absence of this crucial measure could potentially mitigate the privacy issues arising from the high-density proposed development.

21-10

8. Insufficient Parking Allocation: The proposed housing development plans lack adequate provisions for parking spaces. High-density housing typically results in an increased demand for parking, yet the current plans fail to allocate sufficient parking areas for the anticipated number of residents and their visitors. This oversight could lead to a surge in street parking, congesting our neighborhood roads and creating safety hazards for pedestrians and drivers alike. This is a safety concern within the community and neighboring streets.

21-11

9. Traffic Congestions: The introduction of more homes will inevitably result in increased traffic congestion. Our roads are already struggling to handle current traffic volumes, and additional housing will exacerbate this issue, leading to safety hazards in the community and neighboring streets.

21-12

10. Community Character and Aesthetics: Our neighborhood has a unique character that will be altered significantly by the introduction of high-density housing. This change may diminish the appeal and charm that attracted many of us to live here in the first place. Since 1983, I have proudly called the City of Orange my home. I have attended schools within the OUSD and chose to raise my family here. On the City of Orange website, it states "Orange, CA, is a great place to live, work, and shop. From the Plaza to our top-rated hospitals, schools, and parks, we're a "Slice of Old Towne Charm", our community would like to keep with that statement and motto.

21-13

I respectfully request that the City of Orange City Council members consider alternative development plans that are compatible with the existing infrastructure and character of our city and neighborhood. I urge the City of Orange City Council members to engage in an open dialogue with our community to explore options that address housing needs while preserving the integrity of the City of Orange, "Slice of Old Town Charm" and our

21-13

neighborhood. This is important to me, my family, and families on Carleton Avenue to preserve the integrity of our street for generations to come.

Thank you for considering the concerns of the residents. I hope that together, we can find a solution that benefits both prospective and our established community.

Sincerely,

Carolyn Jones

1014 E. Carleton Ave.

Orange, CA 92867

Individual Response 21 – Carolyn Jones (December 4, 2023)

- 21-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 21-2 The comment provides the Commenter’s opinion. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 21-3 The comment expresses concern about privacy, light, and noise. Regarding privacy and light, please refer to General Response 2. Regarding noise, a Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 21-4 The comment expresses concern about neighborhood integrity and zoning. Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.
- 21-5 The comment suggests that existing infrastructure (public services) is unable to handle the proposed Project. Draft IS/MND Section 5.15 (page 75) analyzes impacts to public services including fire, police, schools, parks, and other public services. The analysis determined that no significant impacts would occur. Orange Police and Fire Departments have reviewed the Project, provided comments, and determined that the Project would not adversely affect response times or services.
- 21-6 The comment pertains to traffic. Please refer to **General Response 1**.
- 21-7 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 21-8 The comment expresses concern about shadowing solar panels on existing properties. The topic of shade and shadow impacts is addressed in **General Response 2**.

- 21-9 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 21-10 The comment expresses concern about parking. Please refer to **General Response 1**.
- 21-11 The comment pertains to traffic. Please refer to **General Response 1**.
- 21-12 The comment expresses concern over community character and aesthetic impacts. There are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts. The comment may also be referring to the architecture of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 21-13 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 22 – Jeffrey Jones (December 4, 2023)

Monique Schwartz

From: Jeffrey & Carolyn Jones <jecarjones@gmail.com>
Sent: Monday, December 4, 2023 8:26 PM
To: Monique Schwartz
Subject: Carleton Avenue Homes & Proposed Development

You don't often get email from jecarjones@gmail.com. [Learn why this is important](#)

Dear Ms. Schwartz,

22-1 My name is Jeffrey Jones and I live at 1014 E. Carleton Ave in Orange, CA. I have lived in my home along with my wife, Carolyn, and our two daughters on this street for over 13 years. While living in Orange, I have worked with Orange Unified School District for 20 years. As a teacher (Cerro Villa Middle School), an Assistant Principal (Villa Park High School), and Principal (Nohl Canyon Elementary, Cerro Villa Middle School).

I am writing this email to you to express my strong opposition to the application by Intracorp to build a high-density small lot subdivision adjacent to our R-1 zone property/neighborhood. I strongly urge you to reconsider this project. As a resident of the city of Orange since 2003, I am deeply concerned about the impact this high-density development will have on our community and neighborhoods. I urge you to reconsider this project for numerous reasons.

22-2 1. **Support for Responsible Development:** I am not opposed to the construction of additional housing and the support for responsible development in our community. It's important to note that our community understands the need for housing development to accommodate the growing population. We are not opposed to progress and additional housing opportunities. However, it is imperative that any new development aligns with the existing infrastructure and respects the character of our neighborhood. Responsible development should prioritize the well-being and needs of current residents while also meeting the demand for housing.

22-3 2. **Concerns about incompatible use of Property:** The proposed high-density housing units represent an incompatible use of the property in question. The nature and scale of the planned development do not align with the current use of the land and the surrounding neighborhood. Such a project could disrupt the established harmony and functionality of the area, potentially leading to a decline in the overall livability of our community. Placing 49 units on two acres of property consisting of 12 two-story units, 10 feet from our wall and neighbors, in addition, to building 37 three-story units with rooftop decks is an incompatible use of property. The rooftop decks are an invasion of privacy in both our front and back yards and create increased noise and light pollution.

22-4 3. **Respect for Zoning Laws Intent:** Zoning laws exist to ensure the orderly development of communities, protect property values, and maintain a suitable living environment for residents. The primary purpose of these regulations is to balance the need for growth with the preservation of existing neighborhoods' integrity. Any proposed development should adhere to these zoning laws and regulations to preserve the quality of life and character of our community in Orange.

22-5 4. **Overcrowding and Strain on Infrastructure:** The addition of high-density housing will likely strain our local infrastructure, including roads, schools, utilities, and emergency services. Our neighborhood is not equipped to accommodate such an influx of residents without substantial upgrades, leading to potential safety hazards and reduced quality of life for current inhabitants. This project creates

22-6 | significant traffic issues and poses a danger to the residents of East Carleton Avenue. Cambridge Street adjacent to the AT&T building is poorly designed with a curve leading up to Carleton Avenue. Many drivers ignore the warning flashing yellow lights as they approach the curve and continue to speed on Cambridge. The curve on the road increases the difficulty of seeing cars in the curve going north on Cambridge as drivers attempt to turn left onto Cambridge. I would encourage the traffic planner, city planner, city council members and Mayor to experience this drive as it lessens the visibility of other cars.

22-7 | **5. Decrease in Property Values:** High-density housing developments often negatively impact property values in surrounding areas. This concern is shared by many residents who have invested in homes in this neighborhood and wish to protect their property values.

22-8 | **6. Impact on Solar Efficiency:** Many residents in our neighborhood have invested in solar panels to reduce their carbon footprint and energy costs. The proposed high-density homes could cast shadows and obstruct sunlight, significantly reducing the efficiency of these solar installations. This obstruction not only affects the economic benefits of solar energy but also undermines our collective efforts toward sustainability and renewable energy. As a homeowner, we have invested in solar energy and the high density development affects our ability to harness clean energy efficiently.

22-9 | **7. Lack of Privacy Measures:** The current building plans for the proposed two-story and three-story high-density units do not include provisions for shielding walls or the planting of high privacy hedging/trees. These elements are essential for maintaining the privacy and visual separation between existing residences and the new development. The absence of such measures exacerbates our concerns about privacy invasion and the loss of a peaceful residential environment. The absence of this crucial measure could potentially mitigate the privacy issues arising from the high-density proposed development.

22-10 | **8. Insufficient Parking Allocation:** The proposed housing development plans lack adequate provisions for parking spaces. High-density housing typically results in an increased demand for parking, yet the current plans fail to allocate sufficient parking areas for the anticipated number of residents and their visitors. This oversight could lead to a surge in street parking, congesting our neighborhood roads and creating safety hazards for pedestrians and drivers alike. This is a safety concern within the community and neighboring streets.

22-11 | **9. Traffic Congestions:** The introduction of more homes will inevitably result in increased traffic congestion. Our roads are already struggling to handle current traffic volumes, and additional housing will exacerbate this issue, leading to safety hazards in the community and neighboring streets.

22-12 | **10. Community Character and Aesthetics:** Our neighborhood has a unique character that will be altered significantly by the introduction of high-density housing. This change may diminish the appeal and charm that attracted many of us to live here in the first place. Since 2003, I have proudly called the City of Orange my home. I have worked at schools within the OUSD and chose to raise my family here. On the City of Orange website, it states "Orange, CA, is a great place to live, work, and shop. From the Plaza to our top-rated hospitals, schools, and parks, we're a "Slice of Old Towne Charm", our community would like to keep with that statement and motto.

22-13 | I respectfully request that the City of Orange City Council members consider alternative development plans that are compatible with the existing infrastructure and character of our city and neighborhood. I urge the City of Orange City Council members to engage in an open dialogue with our community to explore options that

22-13

address housing needs while preserving the integrity of the City of Orange, "Slice of Old Town Charm" and our neighborhood. This is important to me, my family, and families on Carleton Avenue preserve the integrity of our street for generations to come.

Thank you for considering the concerns of the residents. I hope that together, we can find a solution that benefits both prospective and our established community.

Sincerely,

Jeffrey Jones

1014 E. Carleton Ave.

Orange, CA 92867

Individual Response 22 – Jeffrey Jones (December 4, 2023)

- 22-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 22-2 The comment provides the Commenter’s opinion. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 22-3 The comment expresses concern about privacy, light, and noise. Regarding privacy and light, please refer to General Response 2. Regarding noise, a Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 22-4 The comment expresses concern about neighborhood integrity and zoning. Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.
- 22-5 The comment suggests that existing infrastructure (public services) is unable to handle the proposed Project. Draft IS/MND Section 5.15 (page 75) analyzes impacts to public services including fire, police, schools, parks, and other public services. The analysis determined that no significant impacts would occur. Orange Police and Fire Departments have reviewed the Project, provided comments, and determined that the Project would not adversely affect response times or services.
- 22-6 The comment pertains to traffic. Please refer to **General Response 1**.
- 22-7 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 22-8 The comment expresses concern about shadowing solar panels on existing properties. The topic of shade and shadow impacts is addressed in **General Response 2**.

- 22-9 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 22-10 The comment expresses concern about parking. Please refer to **General Response 1**.
- 22-11 The comment pertains to traffic. Please refer to **General Response 1**.
- 22-12 The comment expresses concern over community character and aesthetic impacts. There are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts. The comment may also be referring to the architecture of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 22-13 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 23 – Kendall Jones (December 4, 2023)

Monique Schwartz

From: Kendall Jones <kendall.jones817@gmail.com>
Sent: Monday, December 4, 2023 9:41 PM
To: Monique Schwartz
Subject: Carleton Avenue Homes & Proposed Development

You don't often get email from kendall.jones817@gmail.com. [Learn why this is important](#)

Dear Ms. Schwartz,

23-1 My name is Kendall Jones and I live at 1014 E. Carleton Ave in Orange, CA. I have lived in my home along with my parents, Jeff and Carolyn, and my sister Mika on this street for over 13 years. I was born at St. Joseph Hospital in Orange and have proudly lived in the City of Orange all of my life. This home has allowed me to attend OUSD schools which helped me to thrive to be a good citizen in our community.

I am writing this email to you to express my strong opposition to the application by Intracorp to build a high-density small lot subdivision adjacent to our R-1 zone property/neighborhood. I strongly urge you to reconsider this project. As a resident of the city of Orange since 2005, I am deeply concerned about the impact this high-density development will have on our community and neighborhoods. I urge you to reconsider this project for numerous reasons.

23-2 **1. Support for Responsible Development:** I am not opposed to the construction of additional housing and the support for responsible development in our community. It's important to note that our community understands the need for housing development to accommodate the growing population. We are not opposed to progress and additional housing opportunities. However, it is imperative that any new development aligns with the existing infrastructure and respects the character of our neighborhood. Responsible development should prioritize the well-being and needs of current residents while also meeting the demand for housing.

23-3 **2. Concerns about incompatible use of Property:** The proposed high-density housing units represent an incompatible use of the property in question. The nature and scale of the planned development do not align with the current use of the land and the surrounding neighborhood. Such a project could disrupt the established harmony and functionality of the area, potentially leading to a decline in the overall livability of our community. Placing 49 units on two acres of property consisting of 12 two-story units, 10 feet from our wall and neighbors, in addition, to building 37 three-story units with rooftop decks is an incompatible use of property. The rooftop decks are an invasion of privacy in both our front and back yards and create increased noise and light pollution.

23-4 **3. Respect for Zoning Laws Intent:** Zoning laws exist to ensure the orderly development of communities, protect property values, and maintain a suitable living environment for residents. The primary purpose of these regulations is to balance the need for growth with the preservation of existing neighborhoods' integrity. Any proposed development should adhere to these zoning laws and regulations to preserve the quality of life and character of our community in Orange.

23-5 **4. Overcrowding and Strain on Infrastructure:** The addition of high-density housing will likely strain our local infrastructure, including roads, schools, utilities, and emergency services. Our neighborhood is not equipped to accommodate such an influx of residents without substantial upgrades, leading to potential safety hazards and reduced quality of life for current inhabitants. This project creates

23-6

significant traffic issues and poses a danger to the residents of East Carleton Avenue. Cambridge Street adjacent to the AT&T building is poorly designed with a curve leading up to Carleton Avenue. Many drivers ignore the warning flashing yellow lights as they approach the curve and continue to speed on Cambridge. The curve on the road increases the difficulty of seeing cars in the curve going north on Cambridge as drivers attempt to turn left onto Cambridge. I would encourage the traffic planner, city planner, city council members and Mayor to experience this drive as it lessens the visibility of other cars.

23-7

5. **Decrease in Property Values:** High-density housing developments often negatively impact property values in surrounding areas. This concern is shared by many residents who have invested in homes in this neighborhood and wish to protect their property values.

23-8

6. **Impact on Solar Efficiency:** Many residents in our neighborhood have invested in solar panels to reduce their carbon footprint and energy costs. The proposed high-density homes could cast shadows and obstruct sunlight, significantly reducing the efficiency of these solar installations. This obstruction not only affects the economic benefits of solar energy but also undermines our collective efforts toward sustainability and renewable energy. As a homeowner, we have invested in solar energy and the high density development affects our ability to harness clean energy efficiently.

23-9

7. **Lack of Privacy Measures:** The current building plans for the proposed two-story and three-story high-density units do not include provisions for shielding walls or the planting of high privacy hedging/trees. These elements are essential for maintaining the privacy and visual separation between existing residences and the new development. The absence of such measures exacerbates our concerns about privacy invasion and the loss of a peaceful residential environment. The absence of this crucial measure could potentially mitigate the privacy issues arising from the high-density proposed development.

23-10

8. **Insufficient Parking Allocation:** The proposed housing development plans lack adequate provisions for parking spaces. High-density housing typically results in an increased demand for parking, yet the current plans fail to allocate sufficient parking areas for the anticipated number of residents and their visitors. This oversight could lead to a surge in street parking, congesting our neighborhood roads and creating safety hazards for pedestrians and drivers alike. This is a safety concern within the community and neighboring streets.

23-11

9. **Traffic Congestions:** The introduction of more homes will inevitably result in increased traffic congestion. Our roads are already struggling to handle current traffic volumes, and additional housing will exacerbate this issue, leading to safety hazards in the community and neighboring streets.

23-12

10. **Community Character and Aesthetics:** Our neighborhood has a unique character that will be altered significantly by the introduction of high-density housing. This change may diminish the appeal and charm that attracted many of us to live here in the first place. Since 2005, I have proudly called the City of Orange my home and have attended schools within the OUSD. On the City of Orange website, it states "Orange, CA, is a great place to live, work, and shop. From the Plaza to our top-rated hospitals, schools, and parks, we're a "Slice of Old Towne Charm", our community would like to keep with that statement and motto.

23-13

I respectfully request that the City of Orange City Council members consider alternative development plans that are compatible with the existing infrastructure and character of our city and neighborhood. I urge the City of Orange City Council members to engage in an open dialogue with our community to explore options that

23-13

address housing needs while preserving the integrity of the City of Orange, "Slice of Old Town Charm" and our neighborhood. This is important to me, my family, and families on Carleton Avenue to preserve the integrity of our street for generations to come.

Thank you for considering the concerns of the residents. I hope that together, we can find a solution that benefits both prospective and our established community.

Sincerely,

Kendall Jones

1014 E. Carleton Ave.

Orange, CA 92867

Individual Response 23 – Kendall Jones (December 4, 2023)

- 23-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 23-2 The comment provides the Commenter’s opinion. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 23-3 The comment expresses concern about privacy, light, and noise. Regarding privacy and light, please refer to General Response 2. Regarding noise, a Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 23-4 The comment expresses concern about neighborhood integrity and zoning. Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.
- 23-5 The comment suggests that existing infrastructure (public services) is unable to handle the proposed Project. Draft IS/MND Section 5.15 (page 75) analyzes impacts to public services including fire, police, schools, parks, and other public services. The analysis determined that no significant impacts would occur. Orange Police and Fire Departments have reviewed the Project, provided comments, and determined that the Project would not adversely affect response times or services.
- 23-6 The comment pertains to traffic. Please refer to **General Response 1**.
- 23-7 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 23-8 The comment expresses concern about shadowing solar panels on existing properties. The topic of shade and shadow impacts is addressed in **General Response 2**.

- 23-9 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 23-10 The comment expresses concern about parking. Please refer to **General Response 1**.
- 23-11 The comment pertains to traffic. Please refer to **General Response 1**.
- 23-12 The comment expresses concern over community character and aesthetic impacts. There are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts. The comment may also be referring to the architecture of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 23-13 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 24 – Laurence Hamlin (December 4, 2023)

Monique Schwartz

From: Larry Hamlin <revlgh@hotmail.com>
Sent: Monday, December 4, 2023 9:02 AM
To: Monique Schwartz
Subject: Building on Katella and Cambridge

You don't often get email from revlgh@hotmail.com. [Learn why this is important](#)

Dear Ms Schwartz

24-1

My name is Laurence Hamlin, and although I do not live on Carlton I do reside on the next street over, on Vanowen.

24-2

I have lived on Vanowen for 38 years.

I find the possibility of building 12 two story and 37 three story homes on the lot on Katella and Cambridge outrageous!!!

What a horrible assault on the lives and lifestyles of those families who reside on Carlton!

Can you just imagine having these large structures in your back yard?

Even on Vanowen where I live these homes would be an eyesore.

24-3

If it were a case of building one story homes, on that location it would be a different story. But to create this building boondoggle at this location is outrageous and an assault families sanctity.

24-4

I am an 81 year old man and I find it difficult to under stand how a project like this could even be entertained other than the greed of those who care nothing of those families that would be affected so negatively

Please Ms Schwartz consider carefully how those folks lives would be so negatively affected before you

make any decision and use compassion for those families who live on Carlton and the neighbors who would

Also Be affected.

Thanking you in advance for your consideration
Laurence Hamlin

1312 E Vanowen Ave

Orange Ca 92867

revlgh@hotmail.com

Individual Response 24 – Laurence Hamlin (December 4, 2023)

- 24-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 24-2 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 24-3 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 24-4 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 25 – Stephen and Kristina Reifenstein (December 4, 2023)

Monique Schwartz

From: Stephen Reifenstein <stephen.reifenstein@gmail.com>
Sent: Monday, December 4, 2023 9:25 PM
To: Monique Schwartz
Subject: Opposition to development at 901 E. Katella
Attachments: Opposition to Proposal at 901 E Katella.pdf

You don't often get email from stephen.reifenstein@gmail.com. [Learn why this is important](#)

Hi Monique,
I am attaching my letter of opposition to the proposed development at 901 E. Katella Ave.

Let me know if you have any questions.

Thank you for your time and consideration,
Stephen Reifenstein
(714) 904-5189

Ms. Monique Schwartz
City of Orange
300 E. Chapman Ave
Orange, CA 92866

Re: Proposal to construct 49 small lot homes located at 901 E. Katella Avenue (Design Review No. 5092-22)
Ms. Schwartz,

25-1

I am writing to express my absolute opposition to the proposed development at 901 E. Katella Ave. I am a 5-year resident of the east block of Carleton Ave, which is directly behind the existing AT&T property, where this new high-density development is being proposed. For many years, I have wondered why the property wasn't being developed but I never thought it would turn out to be considered for such a high volume of homes. The current plan is not well thought out.

25-2

The space is very small and isn't a logical location to accommodate 49 homes, especially when 39 of them are planned to have roof top decks. This will eliminate the privacy of all the residents of E Carleton Ave, especially those whose backyards are directly behind the proposed development.

25-3

When we purchased our home on Carleton Ave, my wife and I specifically bought in a safe, private neighborhood in Orange where our kids could safely run around the neighborhood. This ideal is being threatened. Currently, there is a growing number of children that grace the streets with their energy. This would definitely change if our children were looking into the windows of these new homes.

25-4

I'm a believer of developing unused land but this location is not appropriate for the proposed Intracorp development. Moving the proposed community to another area in Orange or significantly reducing the number of homes would be greatly welcomed. I don't want to see our neighborhood property values to plummet. Most of all, I don't want to fear for our neighborhood's privacy.

25-5

More reasons why the current plan does not work:

- Increased traffic
- Parking bleed over onto E Carleton Ave
- Light and noise
- Privacy, privacy, privacy

I invite any member of the Design Review Committee, City Council or even the Mayor to visit our street and the surrounding area to see that this is not the right plan.

Thank you for your time and consideration!

Stephen & Kristina Reifenstein
1125 E Carleton Ave
Orange, CA 92867

Individual Response 25 – Stephen and Kristina Reifenstein (December 4, 2023)

- 25-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 25-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 25-3 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 25-4 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 25-5 The comment references several topics, including traffic, parking, light, noise, and privacy. The topics of traffic and parking are addressed in **General Response 1**. The topics of light and privacy are addressed in **General Response 2**. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.

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Individual Comment Letter 26 – Todd and Brittany Calvert (December 4, 2023)

Monique Schwartz

From: calvertdesigns1@gmail.com
Sent: Monday, December 4, 2023 9:11 PM
To: Monique Schwartz
Subject: Concerned email regarding proposed project at 901 e. Katella Avenue

You don't often get email from calvertdesigns1@gmail.com. [Learn why this is important](#)

Dear Mrs. Schwartz,

26-1 Hello, my name is Brittany Calvert and I live at 1205 East Carleton Avenue in Orange. I have lived here for 2 1/2 years with my husband Todd and three children.

We have learned about the proposed development at 901 E. Katella Avenue and we are writing to voice our many concerns regarding the application by Intracorp for this development.

Included in our concerns are:

26-2 - Cramming 49 two and three story homes with rooftops with no more than a 10 foot setback from existing homes. This will greatly impact the privacy of many residents on Carleton.

26-3 - Additional traffic in our neighborhood, especially on a turn down Cambridge that is already very dangerous to turn out of.

26-4 - Property values will decrease for many homeowners due to the invasion of privacy in their homes and yards.

26-5 - Where will overflow parking go? There are only 30 proposed guest parking spots for 49 homes. Not to mention, there will be homeowners with more than two cars for their two car garage. Where will they park?

26-6 - Increase in noise and light pollution.

26-7 - Future developments that may get approved on Katella in the future which will then impact our entire street (It's already starting on the other end with the senior living housing underway).

26-8 I am not opposed to more housing and developments in the city of Orange. But, there has to be a more appropriate spot. How is it okay to take a commercially zoned piece of property and turn it into 49 homes? A ten foot setback is absolutely preposterous! And four stories?! I do not know of anyone in the city of Orange, or any city for that matter that would be okay with this kind of development and invasion of privacy and way of life.

I hope that our thoughts and concerns are taken very seriously. And I am sure that the city can thrive and make a lot of money off of a different project for that piece of land.

Thank you so much for taking the time to read our concerns.

Sincerely,

Todd and Brittany Calvert

[Sent from Yahoo Mail for iPhone](#)

Individual Response 26 – Todd and Brittany Calvert (December 4, 2023)

- 26-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 26-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 26-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 26-4 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 26-5 The comment expresses concern about parking. Please refer to **General Response 1**.
- 26-6 The comment expresses concern about noise and light pollution. The topic of lighting is addressed in **General Response 2**. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 26-7 The comment references future development on Katella but does not provide specific comments. Future development would be governed by existing land use regulations or discretionary actions similar to the proposed Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 26-8 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 27 – Betty and Bill Bath (December 5, 2023)

Monique Schwartz

From: mbath@socal.rr.com
Sent: Tuesday, December 5, 2023 12:24 AM
To: Monique Schwartz
Subject: December Design Review Committee Meeting

You don't often get email from mbath@socal.rr.com. [Learn why this is important](#)

Dear Ms. Schwartz:

27-1 | My name is Betty Bath. My husband, two-year old daughter and I moved to the City of Orange in 1958. I love this city and have always been pleased that we chose to raise our family here. The city has always had a good record in providing its residents safety, good schools, property value, cleanliness, recreation opportunities, a healthy environment, multi-use parks, and attractive community buildings. In 1965 our family moved to our present home at 1046 E. Trenton Avenue and our family has lived in this house since that time.

27-2 | I am concerned to learn that there is a proposal to build 49 residences on the AT&T property at the corner of Katella and Cambridge. There is a large curve in Cambridge slightly north of the intersection with Katella, which greatly reduces visibility and makes it difficult to exit Carleton safely. Because of the fact many drivers drive above the speed limit, it is also somewhat difficult to exit Van Owen and Trenton safely because of the reduced visibility. I believe this curve has also been a factor in several of the accidents that have occurred at the nearby intersections. In addition to the traffic already on Cambridge, many cars turn onto Cambridge from Katella at this intersection.

27-3 | When we moved into our current house, cars could exit Trenton at either Tustin or Cambridge. Some years back the city permitted Toyota of Orange to close Trenton at Tustin which caused the volume of cars exiting at Cambridge to increase dramatically. Additionally, there is a large mobile home park located behind Toyota of Orange, and those residents must all use Cambridge to enter and exit Trenton. There have been several accidents at the intersections of Carleton and Cambridge, Van Owen and Cambridge, and Trenton and Cambridge as well as many near misses. I believe, increasing the numbers of vehicles trying to turn at these intersections will greatly increase the number of accidents. Many cars turn onto Cambridge at the Katella intersection and during heavy traffic times the volume of traffic using Cambridge is very high..

27-4 | If this development is approved, I believe that parking will become very challenging for those living in the area. Many families have multiple cars and the overflow of those seeking parking from the proposed development will seek parking space on Cambridge. There is already a large apartment complex on Cambridge across the street from the proposed development and Carleton, and many of those residents park on Cambridge and the nearby streets.

27-5 | The property value of the homes in the area, particularly those on Carleton, will probably decrease because of the proposed development. The proposed multi-story residences will cause the loss of privacy for those living nearby.

Betty and Bill Bath, 1946 E Trenton Ave

Individual Response 27 – Betty and Bill Bath (December 5, 2023)

- 27-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 27-2 The comment pertains to traffic. Please refer to **General Response 1**.
- 27-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 27-4 The comment expresses concern about parking. Please refer to **General Response 1**.
- 27-5 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 28 – Eduardo Esquivel (December 5, 2023)

Monique Schwartz

From: Aaron Dasher <soccerdash1@yahoo.com>
Sent: Tuesday, December 5, 2023 9:57 PM
To: Monique Schwartz
Subject: 49 unit project off Cambridge and Katella (letter from homeowner 1036 E Carleton Ave Eduardo Esquivel)
Attachments: To the City of Orange on Behalf of 1036 E Carleton Ave homeowner.docx

You don't often get email from soccerdash1@yahoo.com. [Learn why this is important](#)
My thoughts and feelings conveyed in the letter attached below. Please read and take into consideration. Thank you.

To the City of Orange on Behalf of 1036 E Carleton Ave homeowner,

28-1 I understand we have a need in the City of Orange for more housing, especially low-income starter
homes. However, I cannot and do not approve of the new 49-unit project being built directly behind my
home. 37 three story homes, with 12 two story homes regardless of a ten-foot setback, is a complete
invasion of privacy, and will devalue my home along with my neighbors as well. I don't want people
having the ability to peer directly into my backyard. You know this project is flat out wrong, and I am
sure you would not want your own privacy taken from you. Not to mention when someone throws a
28-2 party, or has people over at that complex, they will inevitably run out of parking and take OUR limited
spots on our street. This area is already so heavily congested and adding 49 units in such a small area is
bound to lead to accidents. Try getting off our street, I guarantee you when it's a busy time of the day,
28-3 you will be stressed out just trying to make a simple left without getting hit. Creating another 49 units in
such a small dense area as this is just adding fuel to the fire. I urge you to consider all this and look after
your people.

Thank you for reading and helping us out.

Eduardo Esquivel

Individual Response 28 – Eduardo Esquivel (December 5, 2023)

- 28-1 The comment expresses concern about privacy and home values. Please refer to **General Response 2** for additional information on privacy. Regarding home values, the topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 28-2 The comment expresses concern about parking. Please refer to **General Response 1**.
- 28-3 The comment pertains to traffic. Please refer to **General Response 1**.

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Individual Comment Letter 29 – Mai Vu (December 5, 2023)

Monique Schwartz

From: Mai Vu <th.mai24@gmail.com>
Sent: Tuesday, December 5, 2023 5:09 PM
To: Monique Schwartz
Cc: dan@danslater.com
Subject: Opposition to Intracorp's Application for High-Density Small Lot Subdivision - 901 E Katella Ave

[You don't often get email from th.mai24@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms. Schwartz, Mr. Slater,

29-1 | I am Mai Vu, a resident of 1138 East Carleton Avenue in the City of Orange for almost a decade. I am writing to express my strong opposition to the application by Intracorp to construct a high-density small lot subdivision adjacent to our R-1 zoned property, located at 901 E Katella Ave (APN 375-461-41).

29-2 | While recognizing the need for additional housing, the proposed development of 49 multistory units on a 2-acre lot, with units positioned 10 feet from existing common walls, infringes upon the privacy of current residents on East Carleton Ave. Such proximity raises concerns about privacy invasion, substantial noise, and light pollution, adversely affecting the well-being and tranquility of the neighborhood.

29-3 | The inclusion of 37 rooftop decks appears driven solely by the developer's pursuit of profits, disregarding the negative impacts on the surrounding community, including increased traffic, noise, blocked views, compromised privacy, parking issues, and potential devaluation of properties. This project epitomizes an incompatible land use, exemplifying the developer's profit-centric approach at the expense of residents' quality of life.

29-4 | Furthermore, the proposed development exacerbates existing traffic challenges and safety risks on East Carleton Avenue and Cambridge Street. The road curvature near the property at 901 E Katella Ave creates visibility issues for drivers making left turns onto Cambridge, especially when vehicles are approaching from the north. This project intensifies this hazardous condition, necessitating a thorough evaluation by traffic planners, city planners, city council, and the mayor. A firsthand experience of attempting a left turn onto Cambridge will underscore the gravity of our concerns.

29-5 | Rather than endorsing a General Plan Amendment to permit this small lot subdivision adjacent to single-family zoned property, I advocate for amending the General Plan to prohibit such subdivisions near R-1 zoning throughout Orange. Such an amendment would proactively protect other neighborhoods from similar incompatible developments in the future, relieving them from the arduous task of opposing such projects.

It is my sincere hope that the City acts in the best interest of its law-abiding citizens. Your attention to this matter is crucial in preserving the harmony and well-being of our community.

Best regards,
Mai Vu
1138 E. Carleton Ave, Orange, CA 92867

Individual Response 29 – Mai Vu (December 5, 2023)

- 29-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 29-2 The comment expresses concern about privacy, noise and light pollution. The topics of privacy and lighting are addressed in **General Response 2**. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 29-3 The comment references traffic, noise, blocked views, privacy, parking, and devaluation of property values. Please see Response to Comment 29-2 regarding noise. Please refer to **General Response 1** regarding traffic and parking concerns. Please refer to **General Response 2** regarding privacy concerns. Regarding views, there are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts. Furthermore, private views are not protected. Lastly, the comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 29-4 The comment pertains to traffic. Please refer to **General Response 1**.
- 29-5 The comment expresses the Commenter’s opinion about preventing a small lot subdivision from being allowed next to R-1 zoning anywhere in the City. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 30 – Mika Jones (December 5, 2023)

Monique Schwartz

From: Mika Jones <mikajones44@gmail.com>
Sent: Tuesday, December 5, 2023 3:50 PM
To: Monique Schwartz
Subject: Carleton Avenue Homes and Proposed Development

You don't often get email from mikajones44@gmail.com. [Learn why this is important](#)

Dear Ms. Schwartz,

30-1 My name is Mika Jones and I live at 1014 E. Carleton Ave in Orange, CA. I have lived in my home along with my parents, Jeff and Carolyn, and my sister Kendall on this street for over 13 years. I was born at St. Joseph Hospital in Orange and have proudly lived in the City of Orange all of my life. This home has allowed me to attend OUSD schools which helped me to thrive to be a good citizen in our community.

I am writing this email to you to express my strong opposition to the application by Intracorp to build a high-density small lot subdivision adjacent to our R-1 zone property/neighborhood. I strongly urge you to reconsider this project. As a resident of the city of Orange since 2003, I am deeply concerned about the impact this high-density development will have on our community and neighborhoods. I urge you to reconsider this project for numerous reasons.

30-2 **1. Support for Responsible Development:** I am not opposed to the construction of additional housing and the support for responsible development in our community. It's important to note that our community understands the need for housing development to accommodate the growing population. We are not opposed to progress and additional housing opportunities. However, it is imperative that any new development aligns with the existing infrastructure and respects the character of our neighborhood. Responsible development should prioritize the well-being and needs of current residents while also meeting the demand for housing.

30-3 **2. Concerns about incompatible use of Property:** The proposed high-density housing units represent an incompatible use of the property in question. The nature and scale of the planned development do not align with the current use of the land and the surrounding neighborhood. Such a project could disrupt the established harmony and functionality of the area, potentially leading to a decline in the overall livability of our community. Placing 49 units on two acres of property consisting of 12 two-story units, 10 feet from our wall and neighbors, in addition, to building 37 three-story units with rooftop decks is an incompatible use of property. The rooftop decks are an invasion of privacy in both our front and back yards and create increased noise and light pollution.

30-4 **3. Respect for Zoning Laws Intent:** Zoning laws exist to ensure the orderly development of communities, protect property values, and maintain a suitable living environment for residents. The primary purpose of these regulations is to balance the need for growth with the preservation of existing neighborhoods' integrity. Any proposed development should adhere to these zoning laws and regulations to preserve the quality of life and character of our community in Orange.

30-5 **4. Overcrowding and Strain on Infrastructure:** The addition of high-density housing will likely strain our local infrastructure, including roads, schools, utilities, and emergency services. Our neighborhood is not equipped to accommodate such an influx of residents without substantial upgrades, leading to potential safety hazards and reduced quality of life for current inhabitants. This project creates

30-6

significant traffic issues and poses a danger to the residents of East Carleton Avenue. Cambridge Street adjacent to the AT&T building is poorly designed with a curve leading up to Carleton Avenue. Many drivers ignore the warning flashing yellow lights as they approach the curve and continue to speed on Cambridge. The curve on the road increases the difficulty of seeing cars in the curve going north on Cambridge as drivers attempt to turn left onto Cambridge. I would encourage the traffic planner, city planner, city council members and Mayor to experience this drive as it lessens the visibility of other cars.

30-7

5. **Decrease in Property Values:** High-density housing developments often negatively impact property values in surrounding areas. This concern is shared by many residents who have invested in homes in this neighborhood and wish to protect their property values.

30-8

6. **Impact on Solar Efficiency:** Many residents in our neighborhood have invested in solar panels to reduce their carbon footprint and energy costs. The proposed high-density homes could cast shadows and obstruct sunlight, significantly reducing the efficiency of these solar installations. This obstruction not only affects the economic benefits of solar energy but also undermines our collective efforts toward sustainability and renewable energy. As a homeowner, we have invested in solar energy and the high density development affects our ability to harness clean energy efficiently.

30-9

7. **Lack of Privacy Measures:** The current building plans for the proposed two-story and three-story high-density units do not include provisions for shielding walls or the planting of high privacy hedging/trees. These elements are essential for maintaining the privacy and visual separation between existing residences and the new development. The absence of such measures exacerbates our concerns about privacy invasion and the loss of a peaceful residential environment. The absence of this crucial measure could potentially mitigate the privacy issues arising from the high-density proposed development.

30-10

8. **Insufficient Parking Allocation:** The proposed housing development plans lack adequate provisions for parking spaces. High-density housing typically results in an increased demand for parking, yet the current plans fail to allocate sufficient parking areas for the anticipated number of residents and their visitors. This oversight could lead to a surge in street parking, congesting our neighborhood roads and creating safety hazards for pedestrians and drivers alike. This is a safety concern within the community and neighboring streets.

30-11

9. **Traffic Congestions:** The introduction of more homes will inevitably result in increased traffic congestion. Our roads are already struggling to handle current traffic volumes, and additional housing will exacerbate this issue, leading to safety hazards in the community and neighboring streets.

30-12

10. **Community Character and Aesthetics:** Our neighborhood has a unique character that will be altered significantly by the introduction of high-density housing. This change may diminish the appeal and charm that attracted many of us to live here in the first place. Since 2003, I have proudly called the City of Orange my home and have attended schools within the OUSD. On the City of Orange website, it states "Orange, CA, is a great place to live, work, and shop. From the Plaza to our top-rated hospitals, schools, and parks, we're a "Slice of Old Towne Charm", our community would like to keep with that statement and motto.

30-13

I respectfully request that the City of Orange City Council members consider alternative development plans that are compatible with the existing infrastructure and character of our city and neighborhood. I urge the City of Orange City Council members to engage in an open dialogue with our community to explore options that

30-13

address housing needs while preserving the integrity of the City of Orange, "Slice of Old Town Charm" and our neighborhood. This is important to me, my family, and families on Carleton Avenue to preserve the integrity of our street for generations to come.

Thank you for considering the concerns of the residents. I hope that together, we can find a solution that benefits both prospective and our established community.

Sincerely,

Mika Jones

1014 E. Carleton Ave.

Orange, CA 92867

--

Sincerely,

Mika Jones

Individual Response 30 – Mika Jones (December 5, 2023)

- 30-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 30-2 The comment provides the Commenter’s opinion. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 30-3 The comment expresses concern about privacy, light, and noise. Regarding privacy and light, please refer to **General Response 2**. Regarding noise, a Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.
- 30-4 The comment expresses concern about neighborhood integrity and zoning. Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.
- 30-5 The comment suggests that existing infrastructure (public services) is unable to handle the proposed Project. Draft IS/MND Section 5.15 (page 75) analyzes impacts to public services including fire, police, schools, parks, and other public services. The analysis determined that no significant impacts would occur. Orange Police and Fire Departments have reviewed the Project, provided comments, and determined that the Project would not adversely affect response times or services.
- 30-6 The comment pertains to traffic. Please refer to **General Response 1**.
- 30-7 The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 30-8 The comment expresses concern about shadowing solar panels on existing properties. The topic of shade and shadow impacts is addressed in **General Response 2**.

- 30-9 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 30-10 The comment expresses concern about parking. Please refer to **General Response 1**.
- 30-11 The comment pertains to traffic. Please refer to **General Response 1**.
- 30-12 The comment expresses concern over community character and aesthetic impacts. There are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts. The comment may also be referring to the architecture of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 30-13 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 31 – Katherine Gernak (December 5, 2023)

Monique Schwartz

From: Kathy Gernak <kgernak@sbcglobal.net>
Sent: Tuesday, December 5, 2023 3:01 PM
To: Monique Schwartz
Subject: Design Review No 5092-22 Intracorp Residential Project

[You don't often get email from kgernak@sbcglobal.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Ms. Schwartz:

31-1

My name is Katherine Gernak and I reside at 1136 E. Trenton Ave. in Orange. I have lived here for almost 34 years and raised my family here. I am currently doing improvements on my house, because I plan to retire here and keep this home in my family for many generations to come. I love the City of Orange, my neighbors and my neighborhood! And those are things you just can't buy!

I am writing this email to you to express my heartfelt opposition to the application by Intracorp to build a high density small lot subdivision adjacent to our R-1 zoned property on the former AT&T property.

We all know we need additional housing, and I am not opposed to additional housing construction, but the purpose of zoning laws is to separate incompatible uses of property. Putting 49 units on 2 acres of property at such a busy, poorly designed intersection is simply inappropriate for this relatively small parcel of land.

31-2

This intersection is already dangerous and congested and drivers ALWAYS speed northbound (from Katella) on Cambridge, around a very dangerous blind curve. (My neighbor that lives behind me on Van Owen was killed in this intersection over 20 years ago, taking his grandchildren to school at Cambridge Elementary.) These are things that developer cannot change. I want every traffic, planner, city, planner, city, Council and mayor to drive onto Carleton Street and then try to make a left turn onto Cambridge going southbound; then you will understand the concern. I live on Trenton, and it is hard enough to get out turning left and I am three blocks north of Katella.

31-3

Additionally, 30 guest parking spaces for 49 housing units is simply not going to be enough; creating further congestion and difficulty pulling out of Carleton, especially considering overflow parking would most likely go into the adjacent cul-de-sac street (Carleton).

31-4

This high density zoning change proposal is inappropriate for this particular 2 acre parcel of land. Zoning changes from Commercial to High-density housing, adjacent to R-1 (especially 37 three story units with rooftop decks less than 50 feet from the backyard of single story homes and 12 two story units 10 feet from my neighbors fences) should be prohibited. It is a complete invasion of the privacy of my neighbor's homes on Carleton. I also feel it will devalue my own property in which I take great pride of ownership. In summary, this project is the definition of an incompatible use, the reason zoning laws exist.

Please feel free to contact me personally.
Sincerely,

Katherine Gernak
1136 E. Trenton Ave.
Orange, CA 92867

714-2 93-9358 al.net
714-2 93-9358

Individual Response 31 – Katherine Gernak (December 5, 2023)

- 31-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 31-2 The comment pertains to traffic. Please refer to **General Response 1**.
- 31-3 The comment expresses concern about parking. Please refer to **General Response 1**.
- 31-4 The comment expresses concern about privacy and home value. Please refer to **General Response 2** for response to privacy concerns. The comment suggests that the Project will lower the value of the Commenter’s home. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 32 – Al Tucker (December 5, 2023)

From: Al T <alwtuck@gmail.com>
Sent: Tuesday, December 5, 2023 9:53 AM
To: Monique Schwartz
Subject: Letter of Our Intracorp Residential Design Review Concerns
Attachments: Tucker-Intracorp Development Concerns.pdf

You don't often get email from alwtuck@gmail.com. [Learn why this is important](#)

Dear Ms Schwartz,

32-1

I have attached our paper discussing my and my wife's concerns with the Intracorp Residential Project Proposal which we hope will be part of the December 6 Design Review Records. Our home is adjacent to this proposed project and our home's environment is directly impacted by it.. We are new to this kind of City review and if you have recommendations to who else we should send it to we would appreciate you letting us know. Additionally if you would like to discuss this paper please give us a call at 714-633-3356 landline or to my cell phone number 714-624-6746.

Thank you, Al Tucker

p.s. Our address is in the letter.

Comments on Intracorp Residential Project Proposal

City of Orange Design Review Meeting on December 6, 2023

Introduction

32-2

My name is Alfred Tucker, I along with my wife Lily Tucker, have lived happily at 942 East Carleton Avenue for 48 years. Our home is the third house from the entrance to Carleton Avenue located on the south side directly behind the proposed Intracorp Project. We are pleased to see that there is renewed interests in redeveloping the area behind our home considering it has been ignored for some time. With that said there are issues that need to be addressed in order to properly integrate a new development directly adjacent to an existing well established residential area such as ours. The remainder of this document discusses some of our concerns.

Overview of Concerns and Objections

After a review of the Intracorp Residential Project (The Project) Proposal and the Initial Study/Mitigated Negative Declaration No. 1882-22 we have several concerns and objections to the The Project that we feel need to be considered as part of the first public design review. The following is a summary identifying our initial important areas of concerns:

32-3

1. **Traffic Safety** - The Project Cambridge Street Entrance creates an increased hazard level at the Carleton Avenue intersection due to a significant increase of traffic being injected into the Cambridge Street curve north of Katella Avenue just south of Carleton Avenue. Please note that this was not addressed in the 1882-22 initial study. We recommend that it be included, evaluated for any significant traffic safety issues, and appropriate mitigation actions be added to the development as proposed.

32-4

2. **Privacy and Other Related Issues** in regards to The Project single family units, multifamily two and three story dwellings placed with minimum property setbacks directly next to existing single level homes on Carleton Avenue and the frontage on Katella Avenue, and Cambridge Street.

32-5

3. **Decrease of Property Value** for homes on Carleton Avenue.

32-6

4. **Unacceptable Carleton Avenue Street Parking Issues** resulting from the limited street parking in the design of The Project as currently proposed. Please note that this was not addressed in the 1882-22 initial study.

1 of 10 pages

32-7

Traffic Safety Related to The Project Cambridge Entrance

Background

The existing intersection at Carleton Avenue and Cambridge Street has always been a dangerous intersection to enter or leave Carleton Avenue due to the Cambridge Street curve blocking the view of northbound traffic approaching Carleton Avenue. After living on Carleton Avenue for almost 50 years we still find exiting Carleton Avenue to be an anxiety filled and dangerous experience at various times during the day and night. I am sure that we are not the only ones to have this experience. The Project exit onto Cambridge Street will certainly impose added traffic safety risks to the Carleton Avenue intersection traffic.

The City 1882-22 Initial Study addressed the impact of The Project Cambridge Street exit/entrance including a Site Distance analysis (Site Distance Analysis for the 901 E. Katella Avenue Residential Project, Orange, CA, prepared by Linscott, Law, & Greenspan, dated July 22, 2022 and included in Appendix L). The 1882-22 Initial Study provides a good analysis of this exit/entrance direct impact on traffic from the perspective of Katella Avenue and Cambridge Street traffic flow and provides proposed mitigation actions to reduce the negative impacts. However, this Site Distance Analysis does not take into account the negative impact of The Project traffic exiting to the right which will immediately impact nearby traffic from Carleton Avenue entering or exiting Cambridge Street.

Traffic Concerns

1. **Increased Carleton Avenue Intersection Safety Risk** - as mentioned above the existing intersection at Carleton Avenue and Cambridge Street is very dangerous, especially for traffic exiting Carleton Avenue due to the curve on Cambridge Street limiting the line of sight of oncoming northbound traffic. The detailed analysis provided by the City 1882-22 Initial Study for The Project Cambridge Street exit/entrance as indicated by the site distance analysis indicates that this traffic flow into and out of the Cambridge Street entrance can be made safe by incorporating the mitigation recommendations including prohibiting left turn entrance from Cambridge southbound traffic. However, since the analysis focuses solely on the impact of The Project traffic to northbound and southbound Cambridge Street the analysis does not consider the immediately following impact on Carleton Avenue traffic which is directly after the Cambridge Street curve. This is an oversight in the study that needs to be addressed to ensure that the Carleton Avenue traffic safety is not jeopardized. It is recommended that equivalent site distance analysis of the Carleton Avenue traffic be reviewed and updated as necessary for the current and proposed additional traffic conditions to ensure that the Carleton Avenue intersection is and will remain safe. Carleton Avenue homes were built at least 60 years ago considering our Carleton home was built in 1963. Any site distance analysis done originally most assuredly would be outdated with the current and proposed traffic conditions used in the 1882-22 Initial Study. The obvious concern is that based on the current and proposed

32-7
(cont)

conditions (traffic speed and amount of vehicles) the Carleton Avenue traffic may not be safe without additional mitigation. If there is a significant impact on the Carleton Avenue traffic then its mitigation should be considered as part of The Project proposal before any approval is given. This seems necessary to ensure that the full impact of The Project Cambridge Street entrance traffic is understood and mitigated as necessary to ensure that all Cambridge traffic is safe travel. Please note that just looking at the Carleton Avenue intersection location being immediately after the Cambridge Street curve that it most likely could not meet the same site distance criteria currently being imposed on the The Project Cambridge exit/entrance.

32-8

2. **Safe Time Slot Analysis** - Time for Carleton Avenue traffic to safely exit (**safe time slots**) will be reduced and possibly be eliminated during peak traffic periods. The result is that it may be impossible for Carleton Avenue traffic to safely exit onto Cambridge Avenue. There is a concern that this additional right turn traffic exiting from The Project may limit the amount of **safe time slots** for vehicles exiting Carleton Avenue safely due to injection of additional traffic over and above existing conditions. The lack of sufficient line of sight visibility to northbound traffic and limited visibility to southbound Cambridge Street traffic from the nearby telephone pole north of the exit limiting the ability to make a safe decision to exit in a reasonable time. That is motorist have to wait until they are reasonably sure there is sufficient time available, due to traffic breaks, to allow for making the decision to proceed into this intersection. Reducing the available **safe time slots** will result in a hazardous situation. The issue here is that the only safe times to exit is the limited amount of traffic breaks generated by the Katella Avenue intersection only allowing small windows of time (**safe time slots**) for exiting Carleton Avenue traffic between breaks in northbound traffic. The injection of the Project traffic directly into the north bound Cambridge traffic during peak traffic periods throughout the day may well take up some of these time slots and will reduce or eliminate the **safe time slot** periods for Carleton Avenue traffic to exit onto Cambridge Street traffic safely. It is recommended to analyze this anticipated reduction in **safe time slots** to ensure unsafe conditions are not created due to The Project Cambridge Street exiting right traffic.

32-9

3. **The Traffic Sign Mitigation for Cambridge Street Southbound Traffic is Minimal** - The Left Turn traffic into The Project from Cambridge Street is planned to be prohibited but will be controlled with a traffic sign at The Project entrance. This sign may not be effective enough to reasonably stop people from trying to make this turn anyway, allowing an unsafe condition to still exist. Recommend that additional assurance be made to ensure mitigation is adequate.

32-10

4. **Consideration for a Carleton Avenue and Cambridge Street Traffic Light** - In order to reasonably eliminate the potential dangers to Carleton Avenue and The Project traffic as identified above additional mitigation maybe warranted. It is recommended that consideration be made for adding a second intersection traffic light at the intersection of Carleton Avenue and Cambridge Street. This would significantly reduce the current and future safety risks due to the Cambridge Avenue curve with its reduced visibility to northbound traffic. Adding this traffic

32-10
(cont)

light will provide the added benefit that it would allow more time for the Katella Avenue and Cambridge Street intersection traffic to be flushed out making it easier and safer for The Project traffic making a left turn by allowing specific times during the break in traffic to do so. Additionally, with coordination of the traffic lights it may be possible to allow safe left turns into The Project from Cambridge Street which would be a significant benefit to The Project residents.

Privacy and Other Related Issues

32-11

It is understood that developing a new residential community next to an existing R-1-7 (Single Family Residence, 7000 sq ft) zoned residential area will to some extent reduce the existing home's privacy but when done in a minimally invasive way would provide benefits to the overall community and should be encouraged. The Project being proposed requires the rezoning from C-P (Commercial Professional) to R-3 (Residential Multiple Family). While we have always believed that the C-P zoning was a good match for the area and assumed that the property would eventually be redeveloped with C-P zoning we are not in general opposed to changing it to a residential zoning even if it is not ideally located for that purpose. That is, as long as it is properly integrated into the existing area smoothly and properly. When we first were approached about The Project it seemed obvious to us that The Project as proposed would not integrate well into the existing home area as we know it. At the recommendation of the Intracorp representatives we determined we needed to review recently built Intracorp Home developments in the area to better understand what was being proposed. A quick review follows.

Review of Similar New Intracorp Homes Developments

32-12

My wife and I have taken the time to look at several of the Intracorp Homes developments directly on site or on the internet through Google Earth along with additional website resources. In general we feel developments like this could fill a need in a community if properly integrated into the city plan and existing adjacent areas. Based on what we found many of the Intracorp developments were not directly adjacent to long established residential areas with single story homes. They were either buffered by existing commercial areas such as our home is today or they had full street or alley way separations from larger homes that reduced the concern for the minimal 10 foot setbacks as proposed for 901 Katella Avenue site development, therefore, making them better candidates for a high dwelling density.

Miren Development - We first visited the Miren Development at 2607 S. Santa Anita, Arcadia because it had two story single family homes similar to what is proposed for The Project in Orange. From the outside the homes looked nice and were indeed directly behind existing single family homes. We could not access the whole site due to construction but what we did see convinced us that the Arcadia development was a better fit than The Project in Orange allowing it to integrate better into the area. Not perfect! But much easier to live with for the adjacent homes north of Miren Development. There are several reasons for this. First the Miren home development with its 33 homes on 2.8 acres has a lower dwelling density of 11.8 DU/AC (Dwellings per Acre) as compared to The Project in Orange

which has 18.1 DU/AC. This allows the larger two story single family detached homes adjacent to the existing homes to have increased square footage resulting in fewer homes directly behind the existing homes. Additionally, these larger detached homes have a 20 foot setback to the fence as compare to the Orange development homes with a 10 foot setback to the fence. While the lower density of homes, larger homes, and 20 setbacks make it marginally more palatable it is a noticeable improvement over the development in Orange. We could not gain access into the already sold homes so we could not totally evaluate the impact of 20 foot setbacks on privacy from upstairs windows but from the outside they appear to have easy viewing into the existing properties.

It should be noted that on the east side of the development there is a well traveled street separating the development from existing structures. On the South side there are small business areas, and on the west side there are many existing homes which are separated from the Miren Development homes by an existing large cement drainage canal. All of this made the development setbacks less of an issue. So overall this site with its 20 foot setbacks to the north side homes and buffing on the other sides of the development makes it less intrusive to the existing community surrounding it than the proposed Orange development homes.

Docente Development - We then decided to travel to the Intracorp Homes Docente Development at 511 Colby Circle, Claremont which consists of two and three story townhouses totaling 95 homes on 4.9 acres with a dwelling density of 19.4 DU/AC which is slightly denser than The Project in Orange. The only area with directly adjacent homes was on the north side of the development. These units have 10 foot setbacks to the existing properties similar to The Project in Orange. The other sides of the development appeared to be buffered by streets or other spaces making 10 foot setbacks less of a concern.

Fortunately, Docente had model units available for viewing so we were able to look at and enter the two and three story model townhouses. The two story townhouse model was built directly behind the existing homes on the North side with 10 foot setbacks to the fence. This model two story townhouse location was similar to the The Project in Orange single family homes except it was built with the townhouse having the side of the house adjacent to the existing property where The Project in Orange has the back of the home facing the existing homes. The home appeared to be nice inside and well built. We did notice it being very difficult to get around in due to the fairly steep stairways between floors with is a direct result of the higher dwelling density of these homes.

Our review of this development reinforced our concern that 10 foot setbacks would be quite intrusive to the existing homes. Basically, the look from the upstairs windows into the existing homes backyard was wide open leaving little to the imagination resulting in no privacy at all. We found this totally unacceptable for the Orange Katella development in our opinions, now knowing that it would destroy the openness and privacy of our home on Carleton Avenue.

Concerns For Family's Located Directly Behind the The Project In Orange

Background

As may be expected we are opposed to the rezoning of the property to R-3 if it is necessary to allow for two and three story dwelling without significant setback distances between the existing adjacent residential housing because it provides no real regard to the impacts on the existing properties.

According to the City 1882-22 initial study The Project dwellings per acre (DU/AC) density will be 18.1 DU/AC yet in the same study it shows the zoning for poperies on Carleton Avenue where I live as R-1-7 zoning with a lot size is 7,000 sq ft which is about 6 DU/AC. This indicates that the new density is 3 times the density of the exiting homes. The significantly higher dwelling densities are a direct result of allowing for R3 zoning coupled with the small lot provisions.

The homes on Carleton Avenue were originally single story home with large back yards and in general remain that way with the exception of a few homes on the north side of the street adding two story additions. All the Carleton homes butting up against The Project homes and directly affected by the proposed development are single story with reasonable setbacks from the back fence to living spaces. This is not true of the new development with setbacks of only 10 feet with two story dwellings. These homes have second story windows that will look directly in the back yards of Carleton Avenue homes totally eliminating their privacy. In addition, the first story windows may also pose a problem depending on the finish ground level of the Project homes and the resulting backyard fence height.

Allowing this significant increase in housing density is not ideal for many reasons but in our opinion placing three story residential dwellings directly on Katella Avenue (a key east/west thoroughfare) with 10 foot frontal setbacks will be overwhelming for the area and will create a negative visible indication that City's open and beautiful layout and integration of both commercial and residential buildings is not important. The loss of harmony in the City layout will certainly be a loss to the City current and future residents.

Loss of Privacy for Carleton Homes

An example of some of these issues with the proposed compact high density homes impact is our home which is particularly affected by The project proposed housing with only a 10 foot setback from the back fence. Based on the current planning two new two-story homes will be directly behind our home with and eight foot spacing between them. In addition, there will be homes on both sides of these homes with again 8 foot separation. Based on The Project current planning the two homes directly behind our Carleton Avenue home will have a clear view of our entire back yard, our family room, living room, patio, and our master bedroom. And if that is not enough, guess what, the two homes on each side of these homes will have views of very large portions of our home. We find this a very invasive and not a reasonable transition from out existing home with excellent privacy to the new development which essentially eliminates our privacy. To make matters worse several of the three-

6 of 10 pages

32-13
(cont)

story homes in the middle and sides of the The Project complex will most likely have visibility into our home and backyard.

With these new homes 10 ft from my backyard fence there will be other obvious issues which I will just list a few so they can be addressed in the new development's design review for impact mitigation.

- (1) Th current pleasing backyard viewing and environment will be disturbed by the two and three-story homes.
- (2) Excessive occupant noise levels will surely be a problem in both directions.
- (3) We are concerned that the two-story homes with 10 foot setback will limit the natural lighting into the backyard, especially, during the winter months will cause issues with our backyard trees, grass, and plants.
- (4) The lighting from second story windows and exterior lighting will be directed into our back yard.

Decrease of Property Value

32-14

Almost 50 years ago my wife and I purchased our Carleton Avenue home for some very specific reasons. That can be highlighted quickly as an area with more open and spacious lots, with good quality of life, spacious living areas with room to grow, nice neighborhoods, and convenient location with full access to stores and freeways. We specifically desired a single story home and reasonable yard space. We knew instantly when we found our Carleton home that it was the right place for us and our family. Just entering through the front door we could see all the way through the house to a beautiful and spacious back yard. We were sold on the property. We still feel the same today about the home and location. That is why we have never thought about moving. If we were a young couple today we would still want to move here with our family. Plenty of positives and very little negatives. That will certainly change with the new development if it is approved as is. Intracorp Homes representatives came a few weeks back to let us know about the new development they were creating. One of the benefits for the current owners like us was that our home values would go up. When ask why they believed that and they suggested at a new well maintained community next to us would promote higher prices for our home. A the time we suggested that it was unlikely because of the negatives related to the project they described to us. After a more careful review of the City 1882-22 Initial Study we are convinced that the proposed development will more likely result in lower prices for our property. With two and three story houses directly behind our home with minimum setback causing significant loss of privacy, loss of openness, more street parking issues, increased Cambridge Street and Katella Avenue traffic, and safety issues at the Carleton Avenue and Cambridge Street intersection it is not reasonable to think there will be a jump in property values only due to the new development plan as it current exists.

32-15

Carleton Avenue Street Parking Issues

The Project as posed with narrow streets without street parking will immediately increase vehicle parking on Carleton Avenue. Besides being irritating and inconvenient it can hurt property values. Nothing makes an otherwise good housing community less appealing than a street packed with cars and people jockeying for parking space. Who would want to fight that everyday. Building high density housing with streets that don't allow for additional overflow parking puts the burden for this additional parking on the neighboring homes, especially for the adjacent Carleton Avenue homes. This is inherently unfair.

Initially Carleton Avenue street parking had its ups and downs over the years but in general had been more than reasonable. Why? Because the Carleton Avenue housing development allowed for significant parking variations by designing homes with two car garages, large driveways, and allowed street parking as part of the design. Things changed in the last few years with increased parking due to people renting rooms in their homes to Chapman students and others needing places to live. This trend is gradually increasing street parking to this day. This can instantly cause parking issues on the Carleton Avenue due to the near by adult drivers increasing. For example, in a recent situation a homeowner rented to several college students who shared rooms resulting in 3 to 4 cars more on the street. Since we have street parking it allowed the parking to not get out of hand. With the dense dwellings per acre of 18.1 it will not take long for The Project to require additional parking since they only have 30 guest parking spots outside the homes two car garages with no street parking space available. Thus limiting the resident parking to two adult drivers per home. Our experience suggests that will be insufficient and that The Project excess parking will end up on Carleton Avenue. Note that this in turn increases the Carleton Avenue intersection traffic which has already been sited as a traffic safety concern.

Our real life demonstration of this happening is how parking has rapidly increased in past years due to the apartment east of our block across Cambridge Street. Initially, it became a problem due to insufficient parking space for the renters. This improved when the apartment complex added onsite parking which alleviated the problem temporarily. But not for long. In fact, even with the new parking area we began to approach a serious overload of parking on the street in front of our homes and we could not understand why. Finally, we discussed it with some of the people that were parking on the street. As it turned out the apartments were having multiple families with added driving adults living in the apartments sharing the rent to make it possible to live there. So even with the new parking lot the apartment again required additional car parking off premises. Guess where they choose to park? Carleton Avenue, even though it is very perilous to cross Cambridge Street to get to their cars. Basically, they had no where else to go. Again this is a direct result of adding high density housing into a community with little or no street parking. Fortunately, at the moment the Carleton Avenue parking situation has eased a little and is manageable. The point to all this is that if there is extra living space in a home development or an apartment complex there eventually will be a need for additional unplanned

32-15
(cont)

parking. If this additional parking is not designed into these multifamily housing areas it will impact the adjacent areas that do have it.

In the case of The Project being proposed if insufficient parking is available in the development then they will park on the nearest street. The proposed development has 30 non-garage parking spots are for guest use only plus the two car garages for each home. This seems reasonable as planned if the number of adult drivers living in The Project is limited to two, unfortunately, this is not really feasible, and the 30 extra parking slots will not be sufficient to handle the guest and the extra adult drivers. As soon as resident families grow, or times get hard and home owners need more income, or have extended family that will need to live with them, this will result in more adult drivers than planned for. The new community does not have street parking like we do on Carleton Avenue so it is a sure thing that the added adult drivers from The project will be parking on Carleton Avenue. As we said we have already experience this happening so we know it will be a problem! It is just a matter of time. The net result of this is frustration for the Carleton Avenue home owners and an unappealing neighborhood resulting in lower home prices. If the City is responsible they would not allow this situation to occur and add street parking so the new development can handle the majority of their own parking issues. Adding the new development without taking this real world street parking issue into account is irresponsible and should not be allowed. It is noted that this is a direct result of trying to achieve the high density homes per acre of over 18 DU/AC and not having sufficient space for on street parking. This parking issue clearly demonstrates that The Project as proposed will create parking issue indicating the area is two small to accommodate the high density housing as planned and consideration should be to reduce dwelling units per acre from 18.1 to perhaps a more suitable dwellings per acre level so the streets can be widen to allow for additional street parking.

Conclusions

32-16

This paper has brought many issues to light with the Intracorp Homes proposal which need to be addressed. Th most fundamental issue is whether or not a development with such a high dwelling per acre of 18.1 DU/AC is really suitable at the proposed location since to achieve this density requires the going vertical to two to three stories with setbacks from existing residential housing and major streets of only 10 feet. This high dwelling density is not sufficient to mitigate issue with the real world need for street parking. We believe that The Project as currently proposed is not suitable for this location because of its abrupt contrast to the existing community will be quite intrusive and destroy the existing harmony and quality of life as we know in the City of Orange. In addition, it places an untenable burden on the nearby home owners in terms loss of privacy and its related personal safety issues, quality of environment, property value loss, available street parking, and puts Carleton Avenue residents personal safety at risk at the Carleton Avenue and Cambridge Street intersection.

We think the proposed dwelling unit density is excessively high for the area and encourage everyone to step back and consider a more realistic dwelling density that allows for street parking, and limits the

32-16
(cont)

single family detached homes adjacent to the exiting Carleton Avenue homes to single story homes, and limits the maximum home height in The Project to two-stories. These changes will eliminate most of the issues identified previously with the exception of the safety issues relating to the Carleton Avenue and Cambridge Intersection.

We look forward to the design review process and working with City personnel, our neighbors, and outside Development Company personnel (Intracorp personnel with this current proposal) to ensure that City successively develops the 901 E. Katella Avenue Property into the local community with minimal disruption in the the character of the City of Orange and is maximally beneficial to present and future City residents.

Individual Response 32 – Al Tucker (December 5, 2023)

- 32-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 32-2 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 32-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 32-4 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 32-5 The comment expresses concern about a decrease in property values. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 32-6 The comment expresses concern about parking. Please refer to **General Response 1**.
- 32-7 The comment pertains to traffic. Please refer to **General Response 1**.
- 32-8 The comment suggests the Project would eliminate “safe time slots” for vehicles leaving Carleton Avenue. This comment pertains to traffic volumes generated by the Project, which is discussed in **General Response 1**.
- 32-9 The comment suggests that using signage to prevent southbound left turn movements into the Project from Cambridge would not be effective. The Commenter does not provide any evidence to justify this comment. Signage is regularly used on roadways to dictate traffic patterns and regulations. Enforcement is a component to the effectiveness of signage. In this case, the mitigation measure requires signage or striping to restrict the left turn movement, the design of which will be determined during final project design. The final design will then be reviewed and approved by the City’s traffic engineer with the objective of creating a safe and effective means of restricting the southbound left turn movement.
- 32-10 The comment suggests adding a traffic signal at Carleton Avenue and Cambridge Street. In order to install a new traffic signal, the intersection must meet “warrants,” which is the justification for a signal. Signal warrants are generally based on traffic volumes or accident data, or other unique circumstances. The proposed Project does not generate enough traffic to trigger an analysis of signal warrants at that

intersection. Please refer to **General Response 1** for further information on traffic issues.

32-11 The comment expresses concern about privacy. Please refer to **General Response 2**.

32-12 The comment provides the Commenter's opinions about other development projects involving the Project Applicant. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

32-13 The comment expresses concern about privacy. Please refer to **General Response 2**.

32-14 The comment expresses concern about a decrease in property values. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

32-15 The comment expresses concern about parking. Please refer to **General Response 1**.

32-16 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 33 – Jeremy Campadonia (December 6, 2023)

Monique Schwartz

From: Jeremy Campadonia <wrkhrdplyhrd@yahoo.com>
Sent: Wednesday, December 6, 2023 1:31 PM
To: Monique Schwartz
Subject: Letter in opposition to development at 901 Katella Ave
Attachments: 901 E Katella Housing Development_120623 jmc.pdf

You don't often get email from wrkhrdplyhrd@yahoo.com. [Learn why this is important](#)

Hi Ms. Schwartz,

Please find the attached letter in opposition of the proposed 49 unit housing development behind my home.

I'm absolutely sick to my stomach over this entire ordeal, and dreading the outcome of this. Should this development proceed, I worry the future enjoyment of my home will be forever lost.

Please help us reject this proposal....

Thank you, Jeremy

Jeremy Campadonia
Rock Bottom Construction
(714) 612-0772 cell
(714) 744-0144 fax

~~~~~  
This electronic mail message, including attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any unauthorized use, review, disclosure, distribution, or actions taken in reliance on the contents of this information, is prohibited. If you received this e-mail in error and are not the intended recipient, please notify me immediately by telephone or reply e-mail and destroy all copies of the original message.  
~~~~~

12/6/23

Dear Ms. Schwartz (and members of the city of Orange DRC):

33-1

My name is Jeremy Campadonia, I have lived in Orange at 1102 E Carleton Ave for 20 years. I'm writing to express my strong opposition to the application for rezoning and development of 49 unit high/medium density, small lot subdivision housing, proposed at 901 Katella, by Intracorp Homes.

33-2

I purchased my home at 1102 e Carleton Ave, moving from Long Beach to Orange, just over 20 years ago. I specifically and intentionally choose this home and location because of it's traditional suburban setting on a cul-de-sac! It's been a great pleasure to live in Orange, especially on E Carleton Ave. In the 20 years I've lived here, I've never questioned or lamented my decision to purchase my home, and have developed a great appreciation for Carleton Ave – which my neighbors and I relish as 'our little slice of Orange'. As a general contractor, I've spent countless hours and dollars, repairing and improving my home and property, but still have a long list of projects I'd like to pursue. One of those projects is eventually building a pool and re-landscaping my backyard. Should this development move forward, my backyard privacy will be stolen from me!!! All of this, has me questioning my future on Carleton Ave.

33-3

Before moving to Orange, I rented a single story, single family, 3 bed – 2 bath home in Long Beach for 5 years. I was very happy there except for the pre-existing, 3-story apartment building right next door, with windows and balconies looking directly over and down into my home and yard. Of course, all of this existed long before I moved in, so I had little to say about it....but I learned very quickly how inconvenient and frustrating a situation like that can be. For 5 years I dealt with high density dwelling, right next door, which included a daily struggle to find parking, constant loud music, TVs, or people talking with their balcony sliding doors open into their living rooms. Not to mention the extreme lack of privacy in my backyard. I couldn't BBQ or eat outside without someone looking down, overtop of me saying hello, asking "what's cooking". Again, as a renter myself (and knowing that wasn't my forever home) I accepted it and made the best of it.

33-4

When I was ready to move on and purchase my first home, it didn't take long for a friend of mine to introduce me to the city of Orange and a house for sale at 1102 e Carleton Ave. I quickly fell in love with the location (fairly central within Orange County – where most of my work as a contractor is) and it's proximity to the freeways, but mostly I was thrilled to find a home in a traditional suburban setting. A tree lined street, with (mostly) single story homes, two car garages, most with large driveways and plenty of street parking, with each resident having their own street parking in front of their home. No longer would parking be an issue for me. It was also explained to me, that the AT&T property behind my home, was simply a call center and no one on the street really every had much complaint about it (except the occasional loud car stereo or cigarette smoke from an AT&T employee). It was for all of these reasons, I choose to purchase my home and have enjoyed living here for 20 years.

The proposed development on the corner of Katella and Cambridge will drastically, and negatively impact my neighbor's and I's way of life on Carleton Ave. The developer has proposed 2-story homes built only 10 feet away from my rear property line block wall...ONLY TEN FEET! My understanding is these 2-story homes will include 2nd story master bedrooms with windows – these windows would be looking directly down into my backyard and the yards of my neighbors. The thought of this absolutely disgusts me. My wife and I have already experienced several sleepless nights anguishing over this potential disaster, along with many others related to this proposed development.

I'll list some of my concerns and comments below:

33-5

- To the best of my knowledge, the property at 901 e Katella has been zoned commercial/professional since it's inception. If we're all of the sudden going to change it to residential, why did we have zoning laws to begin with!? Why do we have any zoning laws for that matter!? I've also recently found out, the developer and or city is ONLY required to notify entities within 400' of this proposed development!? This is completely OUTRAGEOUS!!! I am furious to find out this proposal has been in the works and planning stages for OVER 2 YEARS, yet my neighbors and I are

33-5
(cont)

just finding out about this (first notified in Mid/late November 2023), and we're only being given/allowed 30 days to respond and object....and in the middle of that 30 day period was a traditionally full-week long Federal holiday known as Thanksgiving. I can't help but feel and believe ALL of this has been careful strategized by the developer Intercorp!

33-6

- The location of this proposed development is awful! No where along Katella (between Glassell and Tustin) does there currently exist any 3-story buildings of any kind, let alone with roof decks! The modern/contemporary styling of the proposed housing does not conform to nor complement the existing surrounding architecture in the immediate area. This development will be a giant monstrosity for all to see, and will completely change (destroy) the skyline – especially as viewed from the residents of Carleton Ave. Residents on the North side of Carleton will walk out there front doors, look southward and see a giant housing development, towering over and above all the existing single story homes sharing a wall with the developed property.

33-7

- Should the homes be built according to the 49-unit plan, all of us (Carleton residents) will also have the unfortunate reality of seeing people on their 3rd story roof decks, entertaining, BBQ'ing, setting up café-string lighting, playing music, or watching outdoor TVs, using patio heater or umbrellas....It will be a nauseating sight and experience for all of us – totally changing and disrupting our way of life on Carleton Ave.

33-8

- The existing traffic problems will be exacerbated. The residents of Carleton Ave already know, how extremely challenging it can be to leave our street at any time of the day. We have near accidents daily, while trying to exit Carleton ave and turn southbound onto Cambridge. I am very concerned how 49 additional homes (most of them 4 bedrooms) is going to impact the traffic on Cambridge. I highly doubt conditions would improve...!?!? I absolutely do not agree with the developers claims of sufficient parking being included in the development. 4 bedroom homes in these area, commonly means 4 cars to go along with it, sometimes more. Where will these extra vehicles park????

33-9

- Parking is another very important concern to all of us on Carleton Ave. Some of us (at the entrance to our street) already deal with and put up with overflow parking for the Cambridge Court Apartments on Cambridge. It's no secret where the new residents with oversized vehicles or more than two vehicles (which there are sure to be) are going to want to park. This is totally unacceptable! Should this happen, it will FOREVER be a problem! Simply making the parking on Carleton Ave, permit-parking only, is not an acceptable solution! My neighbors and I do not wish to become parking police, constantly living our lives questioning who owns this car or that car, constantly calling our neighbors to ask if a car belongs to them or a family member or visiting friend. Resulting in us having to 'police the street' and be the bad guys when we find a vehicle with out a permit/tag. Then having to call the police to get the vehicle ticketed or towed, then wonder and hope the vehicle owner doesn't retaliate in some fasion. Again, this would drastically and negatively impact our way of life on Carleton Ave.

33-10

- My neighbors and I are also SERIOUSLY concerned about the negative impact this development will have on our home values!!! Although Intracorp states this will increase our home value, we all know that to be a BLATANT LIE! Erasing the traditional suburban landscape, and transforming it to a downtown-like environment, is not going to increase property value for the adjacent single family homes on Carleton Ave. Perspective buyers would absolutely think twice when home shopping, before moving onto a street with a development like this right next door. The development would completely rob us of our identity and our warm, quaint suburban home feel. A development like this does not belong backed up to or adjacent to a traditional single family home suburban development. It belongs in an area surrounded by commercial properties or other high density housing, apartment like buildings.

33-11

- Another IMMENSE concern, especially for the 8 – 10 residents whose rear property line backs up to the proposed development site, is PRIVACY! This development will absolutely deprive us of the privacy we've become accustomed to. Several of us have pools in our backyards (I've always

33-11
(cont)

dreamed of building one – I even have some preliminary plans drawn up to build a pool in my yard), and the thought of 2 story homes, 10 feet on the other side of our rear walls is disturbing! This development would destroy the open and carefree enjoyment we each have in our yards now. It's clear the developer has absolutely no concern, care or consideration about this. If they did, they would offer to sacrifice 6' – 8' of space, and plant a row of 36" box ficus trees to create a solid wall of green hedging. This is common practice and would greatly reduce the privacy concerns, but this isn't included in the proposal as it would surely reduce the buildable space, reducing the overall numbers of unit and cut into profit margins. What a disappointment.

33-12

- Lastly, as a resident of Orange, I'm concerned should this project be approved....where does it end!?!? Wouldn't this set a precedent for more and more projects like this? I don't believe there is a resident in Orange who would like a development like this, next to their traditional R-1 zoned home. Should this project be allowed, I'm sure more will follow and a great number of Orange residents are going to have fights on their hands.

33-13

- I fear 'our little slice of Orange' on Carleton Ave will shrivel up.

If the City of Orange approves the rezoning of 901 E Katella and the proposed development plans by Intracorp, I believe, this would display a complete disregard for the privacy and quality of life for the residents of Carleton ave and surrounding streets.

Thank you for time and consideration.

Jeremy Campadonia

1102 E Carleton Ave

12/6/2023

Individual Response 33 – Jeremy Campadonia (December 6, 2023)

- 33-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 33-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 33-3 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 33-4 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 33-5 The comment expresses concern about a change in zoning, which is the discretionary land use decision being considered by the City. From a CEQA perspective, the Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.
- 33-6 The comment pertains to the style (architecture) of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 33-7 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 33-8 The comment pertains to traffic. Please refer to **General Response 1**.
- 33-9 The comment expresses concern about parking. Please refer to **General Response 1**.
- 33-10 The comment expresses concern about a decrease in property values. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 33-11 The comment expresses concern about privacy. Please refer to **General Response 2**.

33-12 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

33-13 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 34 – Melissa Campitelli (December 6, 2023)

Monique Schwartz

From: Campitelli, Melissa <Campitelli_Melissa@sccollege.edu>
Sent: Wednesday, December 6, 2023 2:39 PM
To: Monique Schwartz
Subject: Development of Katella & Cambridge
Importance: High

You don't often get email from campitelli_melissa@sccollege.edu. [Learn why this is important](#)

Dear Ms. Schwartz,

34-1 I live at 1245 E. Carleton Avenue in Orange with my family since 2017, I purchased our home here because of the quiet, peaceful neighborhood in a good school district.

I am writing this email to you to express my opposition and grave concerns related to the Intracorp application of building a high-density small lot subdivision adjacent to our R-1 zone property.

34-2 I am not opposed to the construction of additional housing, and as you can see below, I am an educator and health provider in the city of Orange. However, the primary purpose of zoning laws is to separate incompatible uses of property. Putting 49 units on two acres of property consisting of 12 two-story units ten feet from our neighbors' fences and allowing 37 three-story units with 37 roof top decks which can be lighted and used day and night less than 50 feet from our single-story homes is an invasion of our privacy. This invasion of privacy would affect us inside of our homes, and in both our front and back yards which will also create substantial noise and light pollution, parking overflow onto our block, etc. In short, this density project on a 2-acre parcel of land is the definition of an incompatible use.

34-3 As mentioned, this project will create serious traffic problems and additional dangers to our families as residents of East Carleton Avenue. The Cambridge street adjacent to the AT&T property is incredibly poorly designed with a curve in the road that makes it impossible for drivers on East Carleton to see cars in the curve that are going north, while attempting to make a left turn onto Cambridge. This project seriously increases this dangerous driving condition with a higher likelihood for traffic accidents and most importantly increases safety risks to us, our children and pedestrians.

34-4 Rather than approving a General Plan Amendment to allow this small lot subdivision next to single family zoned property, the General Plan should be amended to prohibit small lot subdivision from being allowed next to R-1 zoning anywhere in Orange. Such a General Plan Amendment would relieve other neighborhoods in Orange from the necessity of fighting this incompatible use in the future. I did not choose to move my young family to this beautiful city with high property taxes to live next to 3-story residential units with roof top decks invading the privacy and sanctity of our home.

Please reassess this plan and consider our concerns.

Sincerely,
Dr. Melissa Campitelli, Psy.D.
Lead Psychologist
Psychological Services
Student Health & Wellness Services
Santiago Canyon College
www.sccollege.edu/shws
[SCC CampusWell](#)

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Individual Response 34 – Melissa Campitelli (December 6, 2023)

- 34-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 34-2 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 34-3 The comment pertains to traffic. Please refer to **General Response 1**.
- 34-4 The comment expresses the Commenter’s opinion about preventing a small lot subdivision from being allowed next to R-1 zoning anywhere in the City. Since this comment does not raise an issue regarding.

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Individual Comment Letter 35 – Janet Majick (December 6, 2023)

Dear Ms. Schwartz (City of Orange Council Members and DRC Members),

35-1

My name is Janet Majick and I live at 1102 E Carlton Ave in Orange, CA. I have lived on this street for almost 20 years with my husband Jeremy. I moved from Long Beach, CA to Orange to create our forever home and life story together on Carleton. We have established our life here and have wonderful neighbors. Sadly, our privacy, quality of life, peace, tranquility and enjoyment of our home is in jeopardy with a proposed development sharing our property line directly behind our home.

35-2

I am writing to express my strong opposition to the rezoning application by Intracorp of the commercial professional property (of 901 E Katella Ave) to a residential small lot subdivision medium density zoning and proposed 49 Unit development plan. I (and many of my neighbors) haven't had a good night of sleep, since Mark and Emilie from Intracorp knocked on our doors several weeks ago – Nov 7th 2023!!!

35-3

This would be the first of its kind ever, small lot subdivision development in the entire city of Orange. I believe the proposed change is not appropriate for this location, as it will be detrimental to my neighbors and I's, and the surrounding communities' way of life.

35-4

Nearly all residents in the affected neighborhoods are completely opposed to the addition of 49 dwellings (sharing an adjacent property line wall with 8 single family, one story homes only 10 ft away -- equals **zero privacy**). This will drastically impact the privacy and quality of life for me, my husband, my neighbors and their children. The proposed units would have a direct line of site into the interior living spaces of our homes (a clear line of site directly into my bathroom, my bedroom, my living room, my kitchen and my laundry room). The privacy and security of casual living in my home will no longer exist. I will be living my life in a fish bowl, always wondering if someone is watching, looking over me.

Emilie from Intracorp told me if I wish to have privacy "That's what window treatments/curtains are for". So, I would have to live with my curtains closed 24 hours a day in my own home for the rest of my life? Is it unrealistic to expect privacy within the interior of my home?

It had been suggested on Nov 7, 2023 (the very first time hearing of this project) by Emilie (of Intracorp) in a conversation I had with her and Rick when they came to my door; If you would like to have privacy in your home (once the units are built) to keep your window coverings closed. Emilie also told me "They don't want to see you just as much as you don't want to see them." So, now I am supposed to change my way of living in my home (of 20 years) by no longer opening my windows for fresh air ventilation and no longer having natural light coming through? What kind of quality of life is that? To even make that kind of suggestion, shows complete disregard for the quality of life my husband and I have enjoyed for years.

I was also ensured by Rick (of Intracorp), they would like to build something comparable to what we are use to.

35-5

Can someone please explain how 49 units (mostly 3 stories tall plus rooftop decks, obstructed skyline view, NO green screen buffer, NO soft transitional space, (homes only 10 ft away from my property line) on 2.6 Acres of buildable space, is comparable to 9 single family, single story homes on approx. 1.84 acres along the Northern shared wall....?

35-6

On paper the design plan refers to the project as medium density, however compared to the established neighboring residences, it will have the visual appearance and feel of high density housing... to the residents of Carleton Ave, it's the equivalent of taking each of our properties and building 4 homes on them instead of only 1. To us, that is high density housing, regardless of how the city or Intracorp wants to define it. It will be HIGH density immediately adjacent to normal/regular suburban style living/density. Does this follow the city of Orange General Plan guidelines...? I don't believe it does!

The proposed design DOES NOT adhere to the city of 'Orange General Plan':

From the Land Use Section, page LU-4:

35-7

Land Use Diversity and Balanced Development:

A well-balanced community provides a broad range of housing and business opportunities as well as recreational, institutional, and cultural activities that serve Orange's diverse population and enhance the overall living environment. By encouraging a mix of land uses, the City can create an active and diverse environment that complements all lifestyles and supports neighborhoods. The City will continue to work toward creating a balanced inventory of land uses that meets the housing needs of all income groups and household types, creates a stable employment and tax base, maintains logical relationships between land uses and community assets, and provides residents with a diverse range of recreational opportunities.

GOAL 1.0: Meet the present and future needs of all residential and business sectors with a diverse and balanced mix of land uses.

Policy 1.1: Maintain a land use structure that balances jobs and housing with available infrastructure and public and human services.

Policy 1.2: Balance economic gains from new development while preserving the character and densities of residential neighborhoods.

Policy 1.3: Provide a range of housing densities and types to meet the diverse needs and lifestyles of residents.

Policy 1.4: Ensure that new development reflects existing design standards, qualities, and features that are in context with nearby development.

Policy 1.5: Prioritize recreation and open space uses at Irvine Lake and protect historic visual resources in east Orange.

Policy 1.6: Minimize effects of new development on the privacy and character of surrounding neighborhoods.

Policy 1.7: Provide a range of open space and park amenities to meet the diverse needs of current and new residents.

35-8

From the Land Use Section, page LU-8:

Contextual and Environmental Compatibility:

Policy 6.1: Ensure that new development is compatible with the style and design of established structures and the surrounding environment.

The proposed design and structures, especially the rooflines and roof shapes, are not consistent with mine and my neighbors' rooflines, found in the surrounding established neighborhood.

35-9

The proposed Design DOES NOT Adhere to the Guidelines set in the Orange Small Lot Subdivision Guidelines:

Goals

Ensure that new small lot subdivisions fit into the existing neighborhood context. (ref. page 4 of Orange Small Lot Subdivision Guidelines)

Neighborhood Context

Scale and Massing

1. Buildings within a small lot subdivision should respect adjacent buildings by responding to their scale, massing, and need for light, natural ventilation, and views. Small lot subdivision development should follow the established size, shape, and form of the surrounding neighborhood through the use of similar proportions and details.

a. Design small lot homes to be similar in scale and to have similar forms and shapes to nearby and surrounding buildings to avoid the appearance of being overwhelming or disproportionate in comparison and to maintain existing massing patterns. (ref. page 6 of Orange Small Lot Subdivision Guidelines)

4. **Privacy:** As with any infill development, some loss of privacy to existing neighboring buildings can be expected with the introduction of a small lot subdivision in an urban setting. To mitigate against any unusual impact on privacy to neighboring interior living spaces, design modifications can be integrated to minimize the impacts

a. Incorporate landscaping and green screens, where appropriate, between buildings on adjacent properties.

c. Arrange window configurations that break the line of sight between houses.

d. Use translucent glazing such as glass block or frosted glass on windows and doors facing openings

There are so many guidelines and policies this project is not adhering to...I could go on and on...

35-10

The proposed design plan lacks soft transitional space and includes NO green screen buffer for privacy between existing single story residences and new 25 ft tall 2 story homes, 10 ft from our property line. This implies Intracorp has complete disregard for the privacy of the existing homes and the wellbeing of the individuals within them.

The proposed units with only a 10 foot setback directly behind my property which would be considered an invasion of my privacy through intrusion upon seclusion or intrusion of solitude

35-10 (cont) | laws, that protects my right to privacy while in solitude or seclusion. This right extends to my private affairs. An example of this: Ability to see from the new development 2nd story window facing my backyard in through my windows of the interior living space of my home while simply living my life or possibility of overhearing/eavesdropping on my private conversations.

35-11 | There is sufficient land elsewhere within the city of orange for medium/high density residential use, the fact Intracorp wants to develop this specific piece of property does not justify a zone change, so there should be no need to rezone 901 E Katella Ave and change our neighborhood and way of the life just for a big profit for themselves. The zone change will not be consistent with the surrounding neighborhood and will take away the small town feel and appeal. Can Intracorp show the zone change will not result in property values going down or interfere with existing privacy and quality of life?

35-12 | Property values will absolutely go down in the area, if the 49 proposed single family and multi-family small lot subdivision homes are built. The proposed 49 dwellings are inconsistent with the neighborhoods developed in the area.

35-13 | California's Covenant of Quiet Enjoyment is essential in preserving the right to peace and harmony in our living space. It ensures that our home truly feels like a sanctuary where you can escape the chaos of the outside world. This provision safeguards individuals from disturbances that may disrupt the tranquility and harmony of their homes. It plays a vital role in maintaining a peaceful living environment for all residents in California. So, this project, if built, would infringe upon mine and my neighbors California Civil Rights to the covenant of quiet enjoyment which insures peace and tranquility for all residents. This project would be an invasion of personal space that undermines the sense of security and tranquility. Quiet enjoyment is the right of a property owner or tenant to enjoy his/her property in peace without interference and this project design (and it's future occupancies) encroaches upon our rights of quiet enjoyment.

35-14 | Traffic and safety of pedestrians and vehicles are major areas of concern. Traffic jams already exist within the distance between the affected area and the intersection (of Cambridge and Katella) during rush hour. The proposed 49 unit development can only make traffic worse. The local neighborhood traffic will disproportionately surge during morning and evening rush hours, causing traffic issues during critical times for the existing neighborhoods, particularly the residents of Carleton Ave. The traffic surge during morning rush hours will also negatively impact safety for children, since students walk to school in the mornings and again in the evenings with after school sports in the area. In general, the area traffic is continuing to increase, and heavy traffic is already common at times, which may not be reflected in the traffic analysis report submitted by Intracorp (the developer) to the city. The traffic analysis was done during a State of Emergency Pandemic "lock down" restrictions in July 2020 which clearly does not provide a true and accurate report.

35-15 | There are concerns, after concerns and opposition, after oppositions. If this project gets approved, both the city and the developer would be failing to adhere to the City of Orange's

35-15
(cont)

Vision, Guidelines and Policies and the city of orange's governing members will appear to show lack of concern for its' residences.

If this project goes through, this would be the beginning of rezoning for small lot subdivision for medium density housing... Ask where else? In the heart of our city in the middle of the historic district!!!

I urge you to disapprove the proposed rezoning and development, and from recent meetings and discussions with my neighbors, I know my opinions are shared by many who have not managed to attend meeting or write letters, emails and e-comments.

I appreciate your time to review my thoughts, questions, and concerns.

Thank you,
Janet Majick
12/6/2023

Individual Response 35 – Janet Majick (December 6, 2023)

- 35-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 35-2 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 35-3 The comment expresses the Commenter’s opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 35-4 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 35-5 The comment states that the Project would obstruct the skyline view. The proposed Project would be subject to the small lot subdivision ordinance height limit of 35 feet. The existing E. Carleton neighborhood has a height limit of 32 feet, as does the existing C-P zoning on the Project site. Therefore, the proposed Project would not substantially change the permitted height. Please refer to **General Response 2** for more information. Additionally, there are no scenic resources or scenic vistas on the Project site or within its vicinity. Please see Draft IS/MND Section 5.1 (page 21) for further information on aesthetic impacts.
- 35-6 The comment expresses concern about a change in zoning, which is the discretionary land use decision being considered by the City. From a CEQA perspective, the Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.
- 35-7 The comment expresses concern about consistency with several General Plan land use policies. Part of the discretionary land use decision being considered by the City is a determination of General Plan consistency. From a CEQA perspective, the Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact.

- 35-8 The comment pertains to the style (architecture) of the proposed buildings. This topic is beyond the scope of the Draft IS/MND. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 35-9 The comment suggests that the Project does not adhere the provisions of the Small Lot Subdivision ordinance. Part of the discretionary decisions being considered by the City is a determination of consistency with the Small Lot Ordinance. The comment references a portion of the Small Lot Ordinance pertaining to architectural style. The City has a detailed Design Review process, which addresses architectural styles. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided. The other portion of the Small Lot Ordinance referenced pertains to privacy. Please refer to **General Response 2**.
- 35-10 The comment expresses concern about privacy. Please refer to **General Response 2**.
- 35-11 The comment expresses objection to the zone change and concern about property values decreasing. The proposed zone change is the discretionary land use decision being considered by the City. From a CEQA perspective, the Draft IS/MND Section 5.11 (page 63) addresses potential land use impacts. The proposed Project will not physically divide an established community. Furthermore, the proposed Project does not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding an environmental effect, or that result in a significant impact. The topic of land values is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 35-12 The comment expresses concern about a decrease in property values. This topic is beyond the scope of the Draft IS/MND. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 35-13 The comment expresses concern about noise. A Noise Study was prepared to analyze noise impacts from the proposed Project. This study is included in Appendix I and summarized on Page 70 of the Draft IS/MND. The noise study determined the increase in vehicle and mechanical noise from the Project would be less than 3 dBA, which is the limit of detection by the human ear (see Draft IS/MND Page 70). Therefore, no significant noise impacts would occur from the proposed Project.

- 35-14 The comment pertains to traffic. Please refer to **General Response 1**.
- 35-15 The comment expresses the Commenter's opposition to the Project. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.

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Individual Comment Letter 36 – Pamela Dittrich (December 6, 2023)

From: Pamela D <pamelard365@gmail.com>
Sent: Wednesday, December 6, 2023 4:00 PM
To: Monique Schwartz
Subject: intracorp proposal

You don't often get email from pamelard365@gmail.com. [Learn why this is important](#)

Dear Ms Schwartz,

36-1 i would like to share with you my reasons for opposing the proposal.

I love the small town feeling on Carleton Avenue in Orange. This neighborhood is very established and stable. Neighbors socialize with each other and help each other out. Greater population density in the immediate area would change this.

36-2 Our ability to turn out from our street to Cambridge would be made even worse by the addition of 49 homes with 3 to 4 bedrooms each with many, many cars exiting the proposed development onto both Katella and Cambridge. Spillover parking would end up on our street.

36-3 Our current level of privacy would be negatively impacted by 2 and 3 story structures adjacent to our homes.

Please consider these reasons when evaluating the benefits vs disadvantages of this project.

Thank you for your attention,
Pamela Dittrich

Individual Response 36 – Pamela Dittrich (December 6, 2023)

- 36-1 The comment is introductory. Since this comment does not raise an issue regarding the adequacy of the Draft IS/MND, no further response is required or provided.
- 36-2 The comment pertains to traffic. Please refer to **General Response 1**.
- 36-3 The comment expresses concern about privacy. Please refer to **General Response 2**.

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SECTION 3.0 REVISIONS TO THE DRAFT IS/MND

3.1 Updates and Corrections to the Draft IS/MND

Following public review of the Draft IS/MND, it is possible that revisions to the Draft IS/MND are warranted based on (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of Draft IS/MND publication; and/or (3) typographical errors. Any changes to the Draft IS/MND are shown as ~~strikeout text~~ to indicate deletions and underlined text to signify additions.

The following revisions are clarifications to the analysis presented in the Draft IS/MND and do not constitute substantial revisions. CEQA Guidelines Section 15073.5 states that a lead agency is required to recirculate a Draft IS/MND “when the document must be substantially revised after public notice of its availability (CEQA Guidelines 15073.5(a)).” Substantial revisions would occur if “a new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance (CEQA Guidelines Section 15073.5(b)(1)).” Since the errata “merely clarifies, amplifies, or makes insignificant modifications to the negative declaration,” recirculation is not required (CEQA Guidelines Section 15073.5(c)(4)).

Section 5.17, Page 83, 1st Full Paragraph

Transportation impacts, both VMT and LOS, have been analyzed in the reports *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Vehicle Miles Traveled (VMT) Analysis, City of Orange, CA*, prepared by ~~Linscott, Law, & Greenspan~~ RK Engineering Group, Inc., dated October 14, 2022 and included in **Appendix J**, *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Trip Generation Analysis, City of Orange, CA*, prepared by ~~Linscott, Law, & Greenspan~~ RK Engineering Group, Inc., dated October 14, 2022 and included in **Appendix K**, and *Site Distance Analysis for the 901 E. Katella Avenue Residential Project, Orange, CA*, prepared by Linscott, Law, & Greenspan, dated ~~July 22, 2022~~ May 30, 2023 and included in **Appendix L**.

Section 5.17, Page 83, 3rd Full Paragraph

~~Furthermore, the Project is also screened from further VMT analysis because the Project occurs in a low VMT generating area.~~

Section 5.17(b), Page 84, 1st Full Paragraph

As document in the report *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Vehicle Miles Traveled (VMT) Analysis, City of Orange, CA*, prepared by ~~Linscott, Law, & Greenspan~~ RK Engineering Group, Inc., dated October 14, 2022, and included in **Appendix J**, the VMT per Service Population within the Traffic Analysis Zone (TAZ) for the Project site would be 15.4 VMT. For the same TAZ, the VMT per Service Population for the City of Orange General Plan Build Out is 31.3 VMT. Since the VMT per Service Population for the proposed Project is less than the VMT per Service Population for the City of Orange General Plan Build Out, the proposed Project is screened from further VMT analysis and the Project’s impact on VMT would be less than significant.

Section 5.17(c), Page 84, Last Full Paragraph

Although existing, the Project driveway on Cambridge Street is close to the Cambridge/Katella intersection. A potential hazard could occur with cars exiting the Project site and making a left turn on to Cambridge Street. Given the potential impact, a sight distance analysis was prepared for that intersection (*Site Distance Analysis for the 901 E. Katella Avenue Residential Project, Orange, CA*, prepared by Linscott, Law, & Greenspan, dated ~~July 22, 2022~~ May 30, 2023 and included in **Appendix L**). The sight distance analysis used the criteria and procedures included in the California Department of Transportation (Caltrans) State Highway Design Manual (HDM) for “Private Road Intersections.” Stopping sight distance is defined in the Caltrans HDM to be the distance required by the driver of a vehicle, traveling at a given speed, to bring the vehicle to a stop after an object ½ foot high on the road becomes visible. Stopping sight distance is measured from the driver’s eyes, which is assumed to be 3 ½ feet above the pavement surface, to an object ½ foot high on the road. The speed used in determining stopping sight distance is defined as the “critical speed” or 85th percentile speed which is the speed at which 85% of the vehicles are traveling at or less. The critical speed is the single most important factor in determining stopping sight distance.

Section 5.17, Page 86, Sources

Sources: *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Vehicle Miles Traveled (VMT) Analysis, City of Orange, CA, prepared by ~~Linscott, Law, & Greenspan~~ RK Engineering Group, Inc., dated October 14, 2022 and included in **Appendix J** ; *901 E. Katella Avenue In-Fill Residential Project (TTM 19253) Trip Generation Analysis, City of Orange, CA, prepared by ~~Linscott, Law, & Greenspan~~ RK Engineering Group, Inc., dated October ~~14~~ 11, 2022 and included in **Appendix K**; *Site Distance Analysis for the 901 E. Katella Avenue Residential Project, Orange, CA, prepared by Linscott, Law, & Greenspan, dated May 30, 2023 and included in **Appendix L***; *City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (TIAG) dated July 2020*; and *City of Orange General Plan Public Safety Element, Figure PS-4.***