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1515 Sixth Street

Coachella, CA 92236

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Dear Mr. Perez,

CHIEF EXECUTIVE OFFICER

Gretchen Gutierrez

Thank you for providing the Desert Valleys Builders Association with the opportunity to review the *City of Coachella's Objective Development Standards, Final Draft, April 17, 2023*. In our review of the *Objective Designs Standards and Objective Designs Standards Toolkit (HCD) links*, the DVBA learned more about SB 35 and SB330, and how certainty of design is a requirement in these laws in hopes of spurring more workforce housing.

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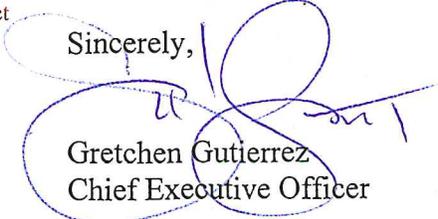
Jeff Wattenbarger

Wattenbarger Construction

DVBA also attended the stakeholders meeting held at the City Library on May 16th. We appreciate that SB35/SB330 and the objective design standards will speed up the planning and approval processes. However, we understand that there is still a quality of workmanship issue by builders/developers that must be attained. For that matter, we constantly hear stories of plans being submitted and redlined, repeatedly, guaranteeing the depletion of deposited funds. In these instances, a third review will see redlines that should have been reviewed in the first submission. At other times, when a project is sent back with redlines, it is resubmitted after corrections made and reviewed by a different planner that has no previous knowledge of the project, nor discussions between builder and planner. These too are regularly sent back with redlines for correction and resubmittal. The timeliness required by SB35/SB330 is forfeited.

The Desert Valleys Builders Association supports the City of Coachella's adoption of an ordinance adopting these Object Design/Developer Standards. We hope that the proposed timelines can be met.

Sincerely,


Gretchen Gutierrez
Chief Executive Officer

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www.TheDVBA.org

From: [Colleen Edwards](#)
To: [Gabriel Perez](#)
Subject: RE: TCC Project Site - South Portion of 6th between Tripoli and Date
Date: June 13 23 11:16:20 AM
Attachments: [image001.png](#)

Hi Gabriel,

Here are my **personal opinions** with regard to the objective design standards:

- Onsite easements for public use (Transition Area Zones) represent a taking of land making a significant area of private sites unbuildable.
- Setting the first floor back from the rest of the building façade would require upper floor cantilevers which are difficult and expensive. This is a detail that we would not be interested in implementing. Instead the entire building would be pulled back to the buildable line representing a significant loss of building floor area yield per site.
- Vertical modulations is a taking of air space rights reducing the buildable area that can be achieved from development sites. This also creates undesirable conditions where elevators service partial floors. I would suggest roof modulation instead.
- Required depth recesses are a taking of development rights decreasing onsite buildable areas.
- Entries with steps up to entry doors from public sidewalks require import of large quantities of expensive dirt to raise the floor plates in the case of flat sites. This feature is typically not financially feasible for affordable housing.

I would suggest applying the standards to the proposed 6th Street Senior project to see if the impacts to the development are as detrimental as I believe they will be based on the draft objective design standards. We should go through the exercise before we submit TCC to be sure that the development is feasible at all and to be sure that it can be built for the budget that we are including in the grant application.

In general these standards are developer unfriendly, represent a significant reduction in buildable area per site reducing unit production and will increase costs beyond what is feasible for most developments having an overall negative impact on the housing supply in the City of Coachella.

Colleen
Colleen Edwards
LEED AP - MRED
Sr. Development Executive
323-590-0233

From: Gabriel Perez <gperez@coachella.org>
Sent: Tuesday, June 13, 2023 9:03 AM
To: Colleen Edwards <cedwards@chelseainvestco.com>; Dave Davis <ddavis@chelseainvestco.com>
Subject: RE: TCC Project Site - South Portion of 6th between Tripoli and Date

Please do. I will need to send to our consultant.

From: Colleen Edwards <cedwards@chelseainvestco.com>
Sent: June 13 23 9:02 AM
To: Gabriel Perez <gperez@coachella.org>; Dave Davis <ddavis@chelseainvestco.com>
Subject: RE: TCC Project Site - South Portion of 6th between Tripoli and Date

Understood. I'll get comments to you today.

I believe the standards would force a partial 4th floor in the building that we would not want if we are required to have strict compliance.

Colleen

From: Gabriel Perez <gperez@coachella.org>
Sent: Tuesday, June 13, 2023 8:56 AM
To: Colleen Edwards <cedwards@chelseainvestco.com>; Dave Davis <ddavis@chelseainvestco.com>
Subject: RE: TCC Project Site - South Portion of 6th between Tripoli and Date

Please submit your comments. I don't know if we will suggest changing them. This is already going to Planning Commission next week.

From: Colleen Edwards <cedwards@chelseainvestco.com>
Sent: June 13 23 8:42 AM
To: Gabriel Perez <gperez@coachella.org>; Dave Davis <ddavis@chelseainvestco.com>
Subject: RE: TCC Project Site - South Portion of 6th between Tripoli and Date

Hi Gabriel,

To meet TCC deadlines we need to have CEQA compliance by application date 8/1. I would appreciate if you would please keep that deadline in mind. Also, the housing element must be approved by the time of award later in the year.