

From: [Jennifer Le](#)
To: [Alex Tellez](#); [Allison Lee](#)
Cc: giasso@irvinecompany.com; [Nimisha Agrawal](#)
Subject: Re: Santa Clara's Objective Design Standards Feedback
Date: Thursday, February 12, 2026 1:28:27 PM
Attachments: [ODS Examples Irvine-Tustin.docx](#)

Hi Alex and Nimisha:

Thank you for meeting with us last week regarding the City's proposed Objective Design Standards (ODS) Phase 1. As discussed, I have attached a Word document with ODS code excerpts from two southern California cities - the cities of Irvine and Tustin. Though California cities have adopted different formats for ODS, most cities we have interacted with statewide have included some sort of "exceptions" provision similar to these. The goal is to allow design flexibility for projects to propose equivalent or better architectural solutions that may not meet the "letter" of the ODS standards, but still propose a high quality design that is acceptable to the City.

The City of Irvine achieves this through an "Alternative Standards Agreement" approved by the Director and subject to findings including that the requested alternative standards meet the intent of the ODS standard and the project includes design features that architecturally compensate for or address any waivers or substitutions.

In the City of Tustin, flexibility is achieved by an applicant opting to go through the City's design review process whereby the Planning Commission may approve project design (including alternative design standards) subject to typical design review findings.

I hope this is helpful. We will send the letter we discussed by tomorrow.

Thank you.

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City of Irvine Municipal Code Section 3-18-5 re: Objective Design Standards, November 26, 2024 (<https://cityofirvine.org/community-development/objective-design-standards>)

Sec. 3-18-5. Exceptions and Exemptions

All projects described in Section 3-18-2 are required to comply with the Objective Design Standards outlined in the Manual. However, an applicant may request up to three (3) minor exceptions/exemptions if they are unable to meet certain Objective Design Standards or may request to enter into an Alternative Standards Agreement to apply substitute standards in lieu of the Objective Design Standards outlined in the Manual.

A. This provision allows for limited discretionary review and flexibility for projects that may have a physical site constraint or propose an alternative architectural solution to a specific standard(s).

B. Requests shall be made by the applicant in writing to the Director of Community Development ("Director") as part of the entitlement application (conditional use permit, master plan, or other application).

C. The Director has decision-making authority over exception/exemption and Alternative Standards Agreement requests. The decision of the Director may be appealed to the Planning Commission in accordance with the procedures established in Chapter 2-5.

D. Exception/exemption or Alternative Standards Agreement request. The written justification for each exception/ exemption or Alternative Standards Agreement request must identify the design standard(s) requested to be waived and how the request meets the applicable findings listed below.

1. Exception/exemption findings. The Director shall consider the request and information provided and make findings to approve or deny the request. An exception/exemption(s) shall be granted only if both of the following findings are made: a. The project meets the intent of the design standard(s) under consideration to be waived, or a similar design standard is implemented in substitution. b. The project meets the minimum density required (30 dwelling units/acre) with the inclusion of the proposed exception/exemption(s).

2. Alternative Standards Agreement findings. The Director shall consider the request for an Alternative Standards Agreement upon finding that:

- a. The strict compliance with the Objective Design Standards in the Manual is not necessary to achieve the purpose and intent of this section;

- b. The project meets the minimum density required (30 dwelling units/acre) with the application of the Alternative Design Standards Agreement;

- c. The Alternative Design Standards Agreement is in a form approved by the Director and City Attorney, in each of their sole discretion; and
- d. The project possesses compensating design and development features that offset impacts associated with the modification, waiver, or substitution of the Objective Design Standards in the Manual.

Tustin City Code Section 9272(a)(5) re: Objective Design Standards, April 1, 2025
(<https://www.tustinca.org/370/Planning-Zoning-Documents>)

(5) Applicants may apply the Objective Design Standards (ODS) to qualifying projects in lieu of the Design Review process, subject to the ODS approved by City Council resolution in effect at the time of application. Qualifying projects include Housing Development Projects as defined in Government Code 65589.5(h)(2) for which State law requires review for compliance using only objective standards. The design and architectural elements of such projects shall be reviewed ministerially for compliance with the ODS. However, projects shall still be required to undergo a public hearing if necessary for the processing of a concurrent entitlement. In such cases, only the architectural review portion shall be processed ministerially.

(i) Applicants may voluntarily opt out of using the ODS for a project, including those projects that qualify under State law for objective review; however, the project will then proceed under the City's standard Design Review process as outlined in this section, which removes the project from the provisions of the Housing Accountability Act.