

FLETCHER 15 PROJECT

CLASS 32 INFILL DEVELOPMENT CATEGORICAL EXEMPTION



Lead Agency:

City of Orange

Community Development Department • Planning Division

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CLASS 32 INFILL EXEMPTION NO. 25-0015

Project Title:

Fletcher 15 Project

Reference Application Numbers:

Administrative Design Review No. 25-0015

Tentative Tract Map No. 25-0015

Environmental Review No. 25-0015

Lead Agency:

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Project Location:

The Project site is located northeast of North Batavia Street and West Fletcher Avenue at 715 West Fletcher Avenue in the City of Orange, Orange County, California (Figure 2-1, *Regional Location*).

Existing General Plan Designation:

Low Medium Density Residential (LMDR)

Existing Zoning Classification:

Multiple-Family Residential District (R-3)

1. INTRODUCTION

The Applicant for the proposed Project is requesting approval from the City of Orange in order to subdivide and develop the proposed Project site with 15 single-family residential lots. The City of Orange is the Lead Agency for the proposed Project. The Lead Agency will utilize this document as evidence that the proposed Project qualifies for the Class 32 Infill Exemption, which is further described below.

1.1. Purpose of Notice of Exemption

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects which have been determined not to have a significant effect on the environment. This document demonstrates that the proposed Project qualifies for a CEQA Exemption as an Infill Development Project (Class 32 Exemption), consistent with the provisions of CEQA Guidelines Sections 15332 and 15300.2 and provides information for City decisionmakers to find that the proposed Project is exempt under CEQA.

Pursuant to CEQA Guidelines Section 15332, the Project qualifies for a Class 32 Exemption because it is: (1) consistent with the General Plan designation and policies and zoning regulations; (2) is located within the City limits, surrounded by urban uses and is less than 5 acres in size; (3) has no value for endangered, rare or threatened species; (4) would not result in any significant effects related to traffic, noise, air quality or water quality; and (5) can be adequately served by all required utilities and public services. Additionally, this document demonstrates that the Project and its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2.

1.2. Document Organization

This Class 32 Exemption Justification includes the following sections:

Section 1. Introduction. Provides information about CEQA, its requirements for environmental review, and explains the exemption justification memo that evaluates the potential impacts of the proposed Project on the physical environment.

Section 2. Environmental Setting. Provides information about the proposed Project's location, the Project site, and background.

Section 3. Project Description. Includes a description of the proposed Project's physical features and construction and operational characteristics, as well as anticipated approvals and permits needed for implementation of the proposed Project.

Section 4. Class 32 Infill Exemption Requirements. Includes the Exemption Justification and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment against the Class 32 exemption requirements.

Section 5. References. Provides a list of sources used throughout the document supporting its conclusions.

2. ENVIRONMENTAL SETTING

2.1. Project Location

The Project site is situated in the western portion of the City of Orange within Orange County. The Project site is located northeast of North Batavia Street and West Fletcher Avenue at 715 West Fletcher Avenue. Regional access to the site is provided via State Route 57 (SR-57), SR-55, SR-91, and Interstate 5 (I-5). Local access to the Project Site is provided via West Fletcher Avenue. The Project site and the surrounding area are shown in Figure 2-1, *Regional Location*, and Figure 2-2, *Local Vicinity*.

2.2. Existing Land Use

The Project site encompasses approximately 0.72 acres (gross and net), inclusive of two parcels identified by Assessor's Parcel Numbers (APN) 374-261-10 and -11. The Project site is vacant, undeveloped, and is heavily disturbed by previous development and grading activities. Vegetation on-site is limited to non-native grasses. An existing 12-foot-high concrete wall is located along the northern and eastern perimeter of the site, and a 6-foot-tall chain link fence is located along the western perimeter. Existing conditions of the Project site and adjacent uses are shown in Figure 2-3, *Project Aerial*, and Figure 2-4, *Existing Site Photos*.

2.3. Existing General Plan Land Use and Zoning Designations

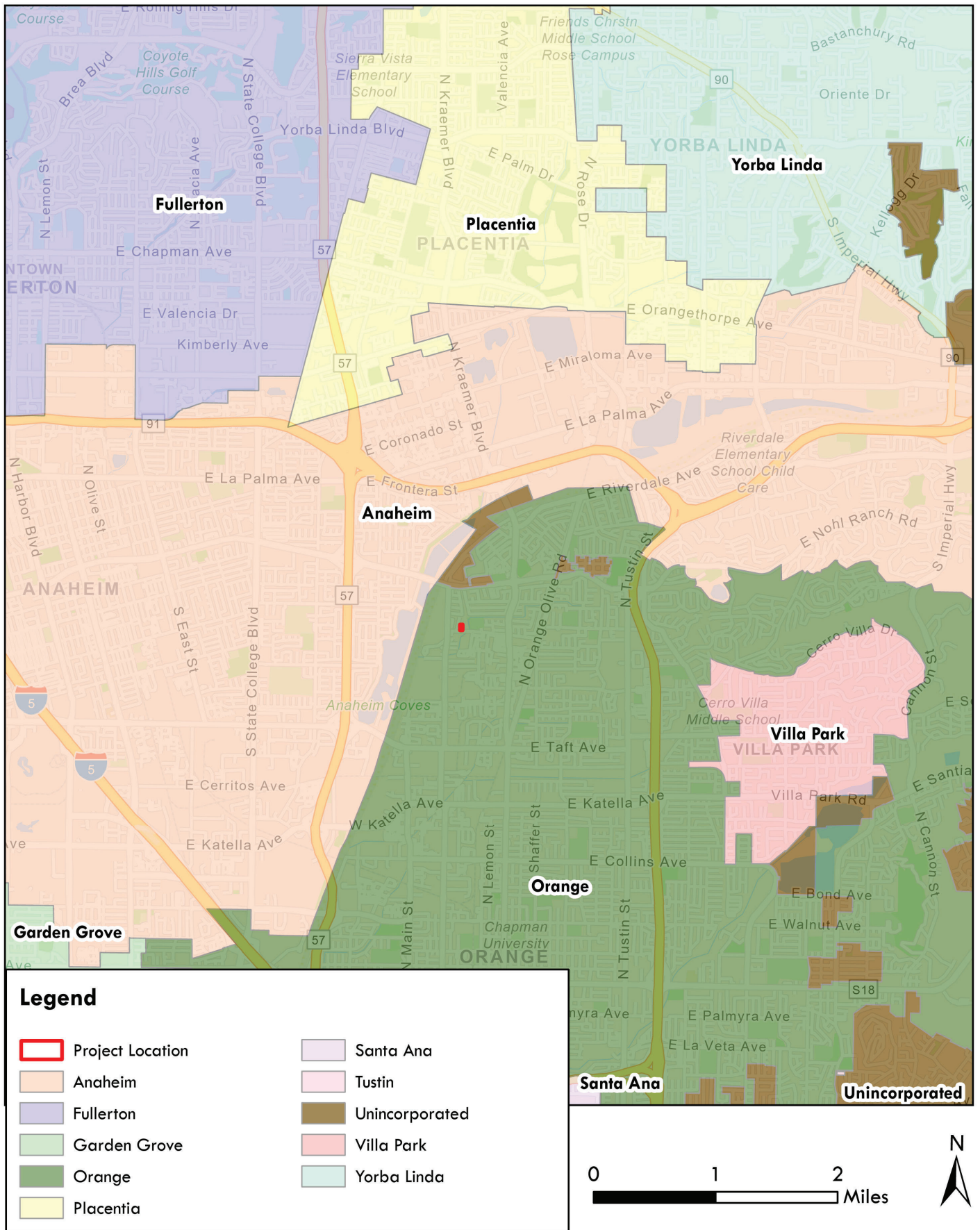
The Project site is designated as Low Medium Density Residential (LMDR) by the City of Orange General Plan and is zoned as Multiple-Family Residential District (R-3), as shown on Figure 2-5, *Existing Land Use Designation*, and Figure 2-6, *Existing Zoning*. The LMDR land use designation is intended for residential development with a density range of 6.1 to 15 dwelling units per acre (du/ac). This designation accommodates small lot or zero lot line single-family subdivisions, duplexes and mobile home parks, as well as lower intensity apartments and condominium complexes. The R-3 zoning designation permits development of apartments, condominiums, and townhomes, with the intent of ensuring higher density residential projects incorporate minimum ground coverage and maximum open space. The R-3 zoning designation also allows Small Lot Subdivisions, as outlined in Section 17.14.270, *Small Lot Subdivisions Development Standards*. These provisions establish supplemental standards that accommodate alternative housing types within multiple-family residential zones and certain mixed-use zones. The Small Lot Subdivision allows for residential development with a density range of 6 to 15 du/ac.

2.4. Surrounding Land Uses

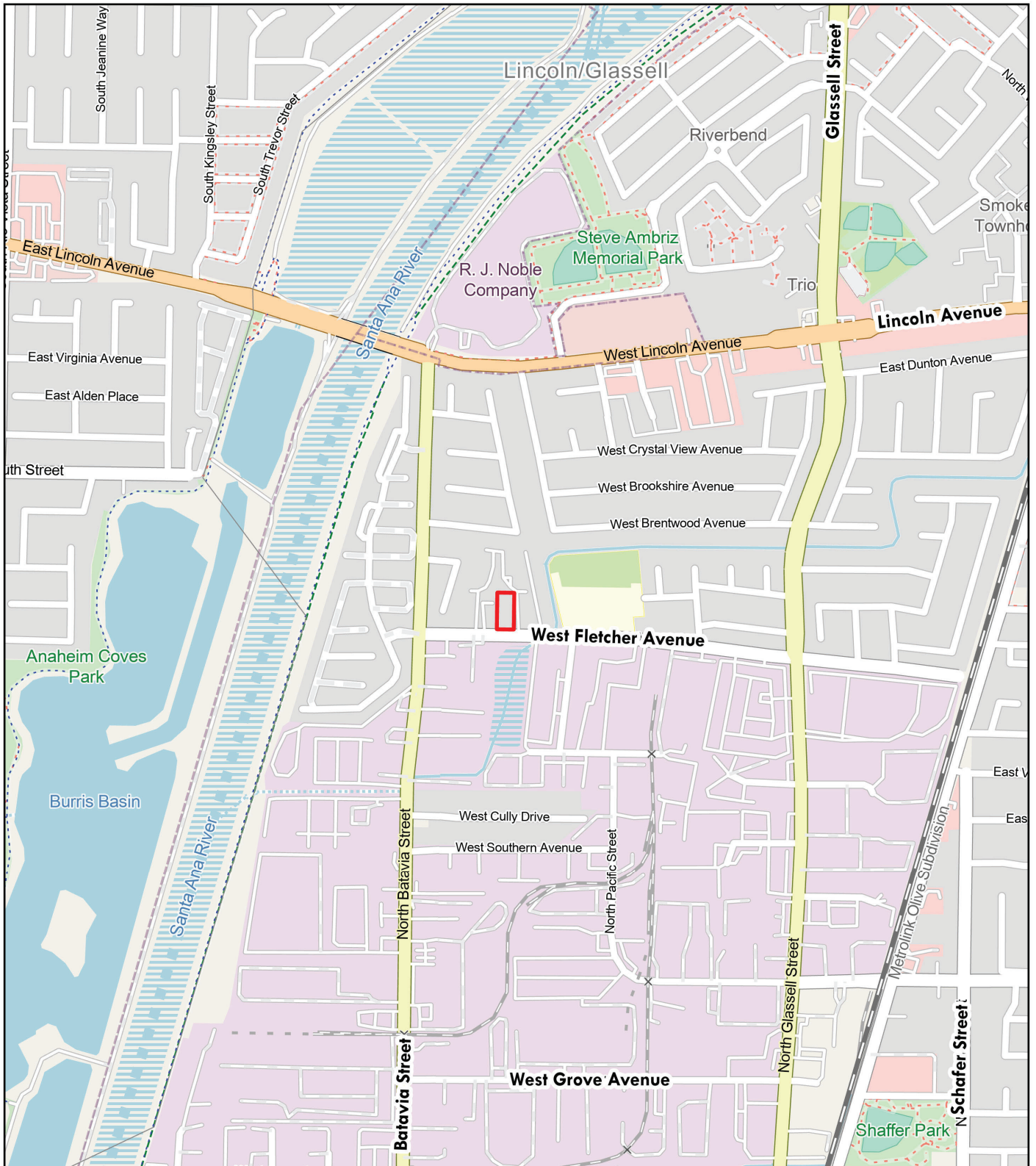
The surrounding land uses are described in Table 2-1 along with the General Plan land use and zoning designations.

Table 2-1: Surrounding Existing Land Use and Zoning Designations

Direction	Existing Use	General Plan Land Use	Zoning
North	Multi-family residential	LMDR	R-3
East	Multi-family residential	LMDR	R-3
South	West Fletcher Avenue followed by industrial uses	Light Industrial (LI)	Light Manufacturing (M-1)
West	Multi-family residential followed by a school	LMDR	R-3 and Residential Duplex (R-2.6)



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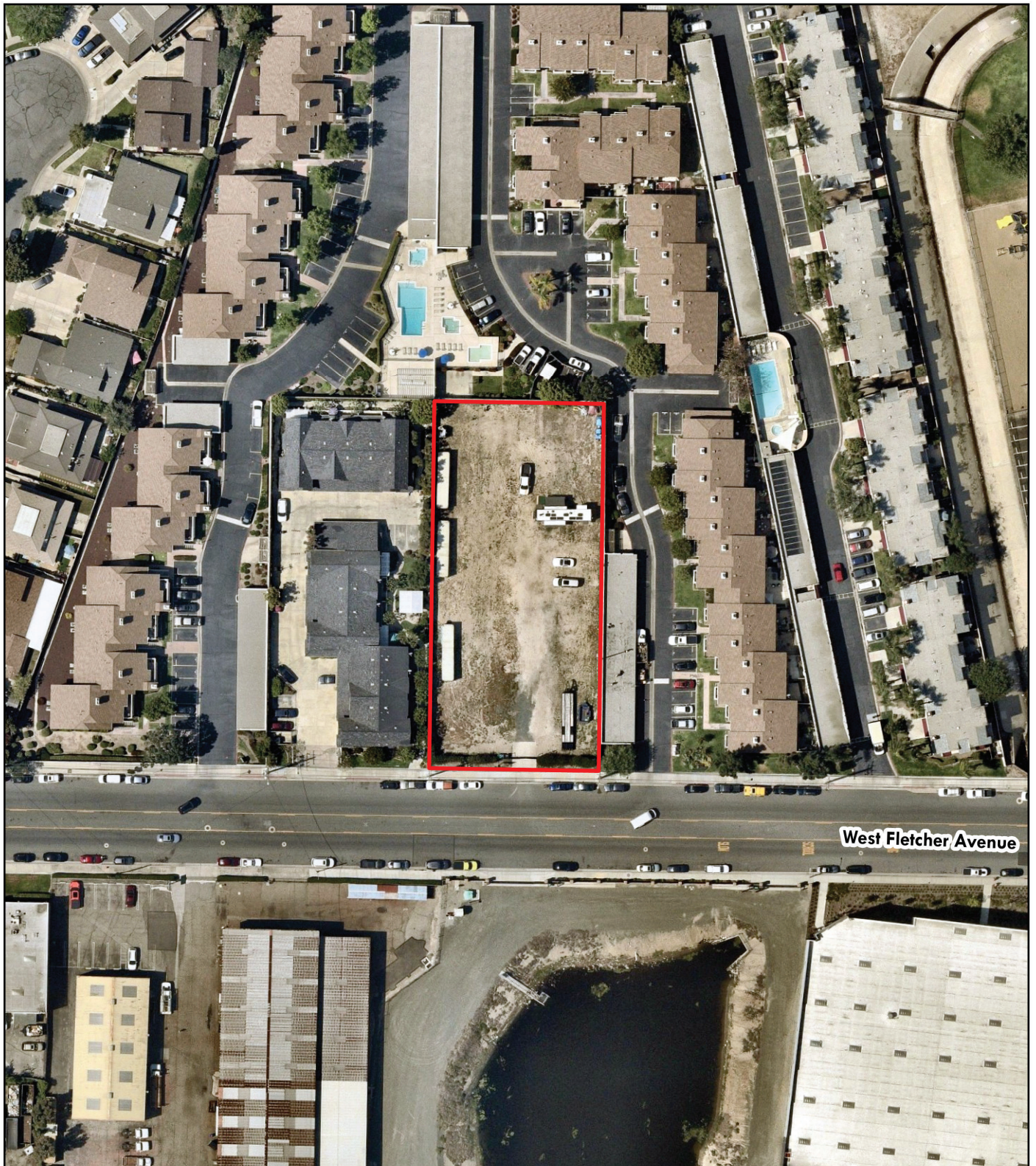
Legend

 Project Boundary

0 0.15 0.3
Miles



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Created with Vertical © 2025 Nearmap US, Inc.

Legend

 Project Boundary

0 100 200
US Feet



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Legend

-  Project Boundary
-  Photo Location



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Photo 1: View of Project site facing northeast from center of project site.



Photo 2: View of Project site facing northwest from center of project site.

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Photo 3: View of Project site facing west from center of project site.



Photo 4: View of Project site facing south from center of project site.

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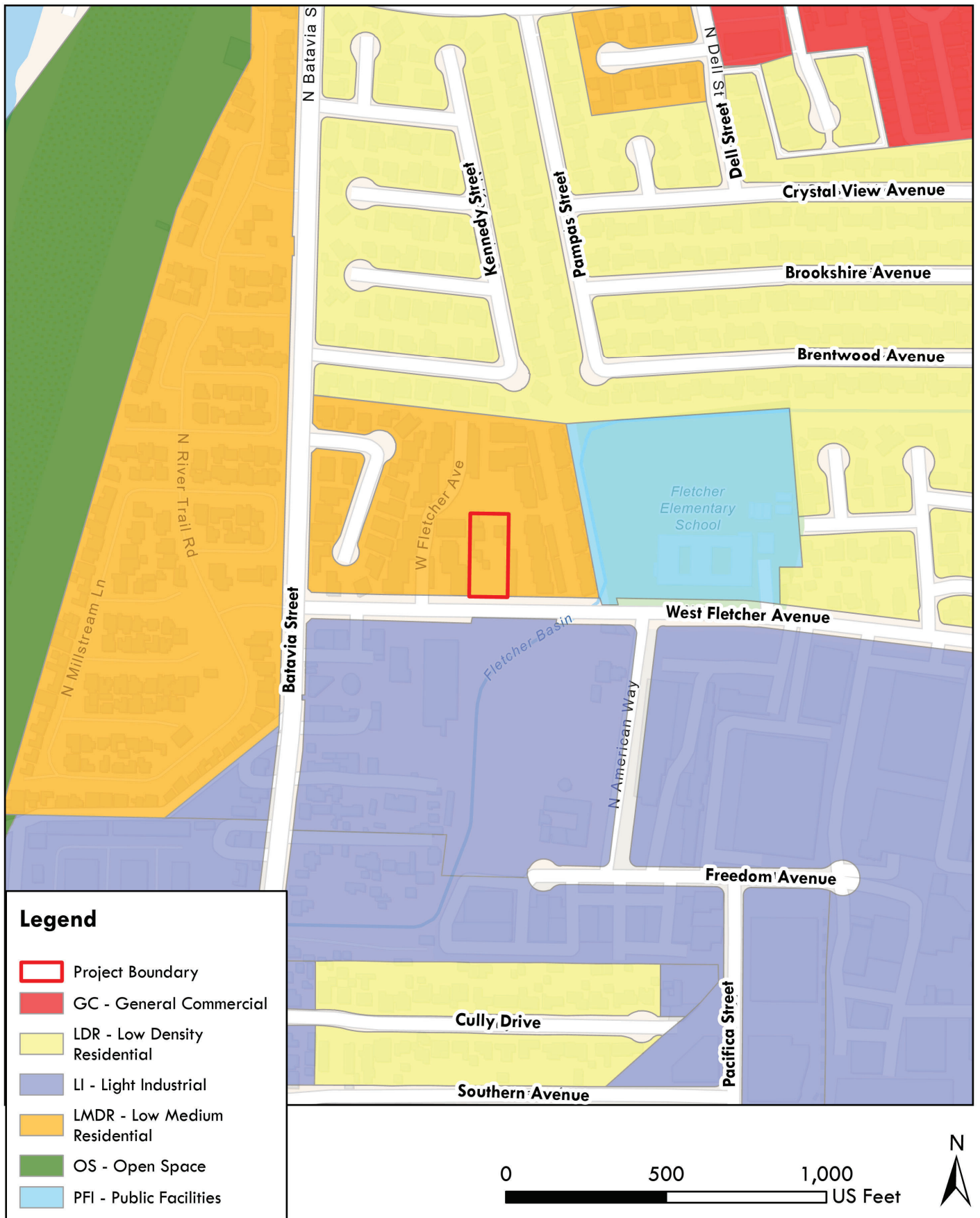
Photo 5: View of Project site facing southeast from center of project site.



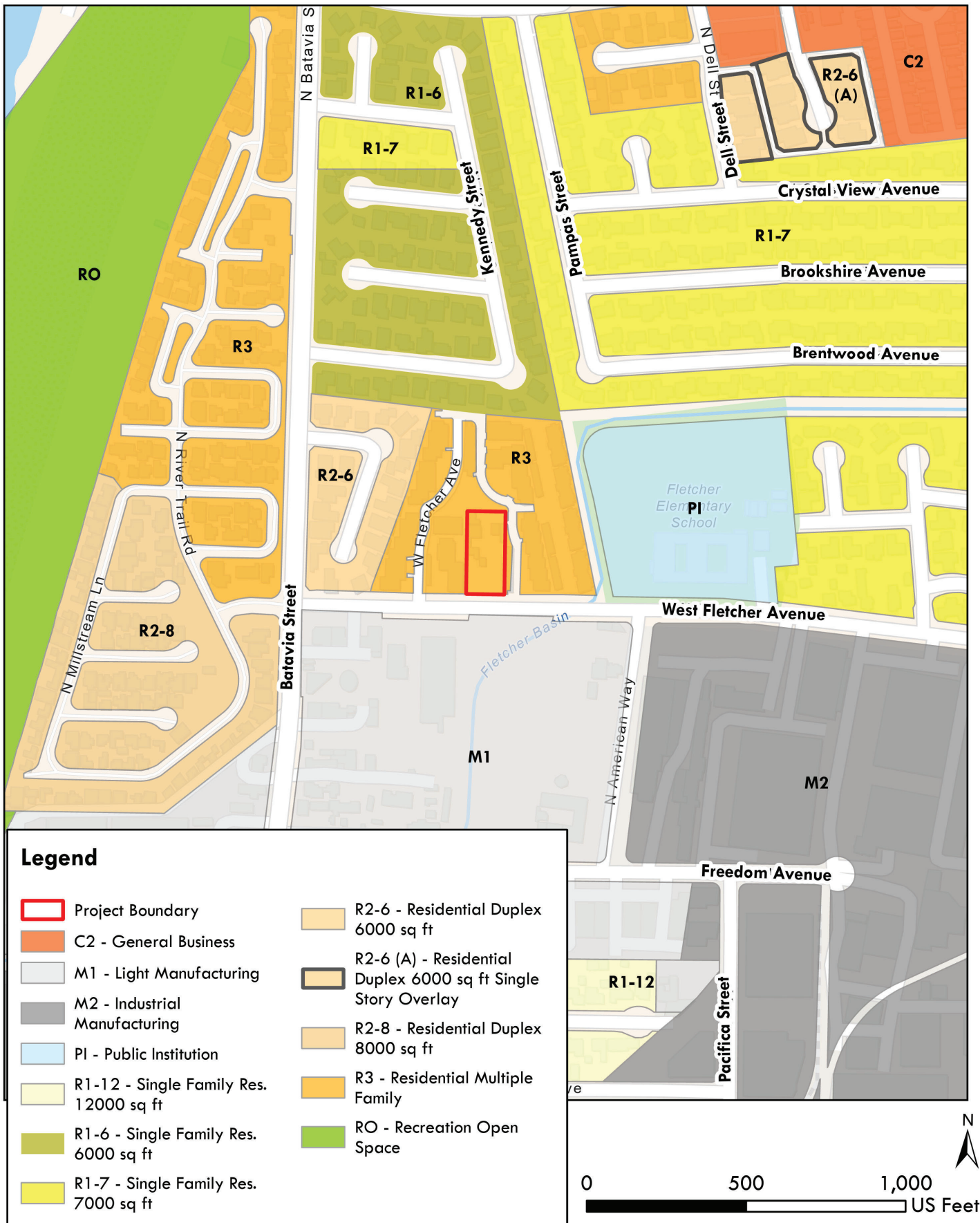
Photo 6: View of Project site facing east from center of project site.

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Figure 2-5: Existing Land Use Designation



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3. PROJECT DESCRIPTION

3.1. Project Overview

The Project applicant proposes to develop the site for single family residential development. The 0.72-acre parcel would be subdivided and developed with 15 single-family residential lots. The proposed Project would also include associated improvements such as landscaping, parking, a private roadway, common and private open space areas, and utility and stormwater infrastructure. Figure 3-1, *Conceptual Site Plan*, illustrates the Project as proposed. The proposed Project requires approval of a Tentative Tract Map and Administrative Design Review application from the City of Orange.

3.2. Project Features

Development Summary

The proposed Project would construct 15 single-family detached residential units on the 0.72-acre site, which would result in a density of 20.83 du/acre. The proposed 15 single-family residences would consist of 14 market-rate units, and one unit (9 percent of the base density) would be reserved for very low-income households, qualifying the proposed Project for benefits under California's State Density Bonus Law (Government Code Section 65915). These benefits would include a 30 percent density bonus (equivalent to four bonus units), development standard waivers and/or reductions, one concession/incentive, and the use of State Density Bonus parking ratios as permitted under the City of Orange Municipal Code Chapter 17.15.

The proposed single-family units would include four bedrooms and three and a half bathrooms, with approximately 1,750 square feet (SF) of internal living space. Each proposed unit would be designed according to one of two product types, described below under *Architectural Summary*. The proposed units would be three stories with a maximum height of approximately 35 feet, measured from finish grade to top of the highest roof ridges. In addition, each unit would include approximately 100 SF of balcony space, and an enclosed two-car garage. The proposed residential units would include a front setback of 8 feet and 6 inches from Fletcher Avenue, a side setback of 5 feet from the adjacent residential uses to the east and west, and a rear setback of 7 feet and 6 inches from the adjacent residential uses to the north.

Architectural Summary

The proposed product types are nearly identical and include the same color schemes. The proposed building elevations would reflect a Spanish-influenced architectural style, characterized by stucco exteriors, clay tile roofs, decorative shutters, and simple, clean building forms. The color palette would feature warm, earthy tones such as sand-finish stucco and tan-brown roof tiles, complemented by neutral gray accents and darker trim elements, including wood shutters and decorative metalwork. These elements would create a cohesive design that blends traditional Spanish features with contemporary residential character. Detailed color boards illustrating the proposed architectural styles and color palettes are provided in Figures 3-2a-d, *Conceptual Elevations*.

Parking and Access

Access to the Project site would be provided via an improved 20-foot-wide driveway on West Fletcher Avenue, which would provide access to all 15 proposed private residences. Internal circulation

throughout the site would be accommodated via a 20-foot-wide private roadway. The proposed Project also includes a 4-foot-wide sidewalk throughout the site that would provide pedestrian circulation.

As shown in Figure 3-1, *Conceptual Site Plan*, the proposed Project would provide a total of 39 parking spaces. The proposed Project would include a two-car enclosed garage for each of the proposed units, totaling 30 garage spaces, along with nine open parking spaces.

Fencing and Walls

The proposed Project would include the installation of a new 6-foot-tall block wall along the western perimeter of the Project site. The existing 12-foot-high concrete wall along the northern and eastern property line would remain. Private yards and residences would be enclosed by vinyl fences with gated access.

Landscaping and Open Space

The proposed Project would include approximately 3,497 SF of common open space landscaping, to be maintained by the Homeowners Association (HOA). The landscaping would feature drought-tolerant plantings throughout the site, incorporating a mix of trees, shrubs, and groundcovers. Tree plantings would consist of 24-inch box and 36-inch canopy trees strategically placed across the development. Trees would be distributed within the interior of the site along fences separating individual units as well as adjacent to West Fletcher Avenue. In addition, the proposed Project would include a common dog park area.

The proposed Project would provide approximately 300 SF of private open space per unit, for a total of approximately 4,455 SF across the Project site. The total open space area proposed is approximately 7,951 SF, or 31 percent of the total site area. Figure 3-3, *Conceptual Landscape Plan*, illustrates the site's landscape plan as proposed.

Photovoltaic (PV) Solar

Consistent with the 2022 Title 24 California Building Energy Efficiency Standards, the proposed Project would include photovoltaic (PV) solar panels on the rooftops of each residence and meet all other Title 24 Part 6 (California Energy Code) requirements related to energy efficiency and low impact development (LID) standards.

Infrastructure Improvements

Lighting

Proposed outdoor lighting would be typical of single-family residential uses and would consist of wall-mounted lighting and pole mounted lighting. In total, the proposed Project would include two proposed pole-mounted lights and 48 wall-mounted lights (approximately three proposed per unit). The proposed Project's outdoor lighting would be directed downward and shielded to minimize off-site and would be designed in compliance with the provisions of Orange Municipal Code Section 17.12.030 (Lighting).

Gas and Electric

The proposed Project would be serviced by Southern California Edison for electricity. The proposed Project is anticipated to be fully electric; however, if natural gas service is required, it would be provided by Southern California Gas. An existing 2-inch gas line is located within West Fletcher Avenue and existing overhead electric lines are located along the Fletcher Avenue right-of-way.

Water and Sewer

The proposed Project would install a new 3-inch water line on-site that would connect to the existing 12-inch water line in West Fletcher Avenue. In addition, the proposed Project would install a new 6-inch on-site sewer line that would connect to the existing 8-inch sewer line in West Fletcher Avenue.

Stormwater Drainage

The proposed Project would include the installation of a 4-inch and 8-inch storm drain line on-site, designed to convey stormwater runoff to an underground storm tank. Stormwater would be collected on-site through a series of grate inlets and catch basins, which would direct flows into the underground storm drain system. The underground storm tank would be located beneath the internal driveway.

Street, Sidewalk, Curb, and Gutter

No street, sidewalk, curb, or gutter improvements are proposed along West Fletcher Avenue.

3.3. Density Bonus Law

The Density Bonus Law (DBL) (California Government Code Section 65915) encourages the development of affordable housing by allowing additional density on a property above the maximum density in a jurisdiction's General Plan. The Project must reserve an allotted number of affordable dwelling units below market rate in exchange for the density increase. Reductions in required development standards such as setbacks may also be granted to qualifying applicants. Additional provisions under DBL include incentives or concessions providing cost reductions, waivers of development standards that would physically preclude the construction of a development with incentives granted, and reductions of parking requirements. Incentives are limited in number and granted on a sliding scale based on the percentage of affordable housing that is provided. Waivers are potentially unlimited in number. Pursuant to California Government Code Section 65915(d), incentives or concessions shall be granted unless (a) "the concession or incentive does not result in identifiable and actual cost reductions... to provide for affordable housing costs... or for rents for the targeted units to be set"; (b) "the concession or incentive would have a specific, adverse impact... upon public health and safety or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific, adverse impact without rendering the development unaffordable to low-income and moderate-income households"; or (c) "the concession or incentive would be contrary to state or federal law." Waiver requests must be similarly granted when a development standard would physically preclude construction of a DBL-qualified project, unless the waiver would have a specific adverse impact that cannot be mitigated or avoided, would have an adverse impact on a property listed in the California Register of Historical Resources, or would be contrary to State or federal law.

The DBL specifies that "the granting of a density bonus shall not be interpreted, in and of itself, to require a general plan amendment, zoning change, or other discretionary approval." Similarly,

pursuant to Government Code Section 65589.5 (the “Housing Accountability Act”), the receipt of a density bonus, incentive, concession, waiver, or reduction of development standards pursuant to the DBL is not a valid basis on which to conclude that a proposed housing development project is inconsistent, not in compliance, or not in conformity with otherwise applicable local land use plan, policies, programs, or standards.

The Project site is designated as LMDR by the City of Orange General Plan and is zoned as R-3 by the City of Orange. As mentioned previously, the proposed Project would result in approximately 20.83 du/acre which is above the allowed maximum density for the site of 15 du/acre. However, the Applicant has requested a density bonus consistent with State law for affordable housing to allow for the development of additional units. Pursuant to the DBL, the Project would be allowed to exceed the maximum site density of 15 du/acre. State law allows the City to approve an increase in density for affordable housing projects without requiring approval of a general plan amendment or zone change.

3.4. Construction

Construction activities for the proposed Project would occur over one phase lasting approximately 12 months, beginning in the first quarter of 2027. Construction would occur in the following stages: (1) site preparation and grading; (2) building construction; (3) paving; and (4) architectural coatings. Construction activities would be limited to the hours between 7:00 a.m. and 8:00 p.m. on any day except for Sundays and federal holidays, and between the hours of 9:00 a.m. and 8:00 p.m. on Sundays and federal holidays pursuant to the City’s Municipal Code Section 8.24.050(E).

The proposed Project grading would be balanced on-site, with no import or export of soil anticipated.

3.5. Operations

The proposed Project is anticipated to be operational the first quarter of 2028. The proposed Project would operate as a privately managed residential community consisting of 15 single-family detached homes. The residences would be individually owned, with ongoing maintenance of common areas, including private driveways, guest parking, shared landscaping, and stormwater facilities conducted by the HOA. Residential operations would be typical of medium-density urban housing and would include standard activities such as vehicle ingress/egress, waste collection, landscaping maintenance, and utility usage.

3.6. Discretionary Action Checklist

In accordance with CEQA Guidelines Sections 15050 and 15367, the City is the designated Lead Agency for the Project and has principal authority and jurisdiction for CEQA actions and Project approval. The following discretionary approvals, permits, and studies are anticipated to be necessary for implementation of the proposed Project:

City of Orange

- Approval of Tentative Tract Map
- Approval of Administrative Design Review
- Approval of Density Bonus Request
- Approvals and permits necessary to execute the proposed Project, including but not limited to, grading permit, building permits, etc.

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SIDE ELEVATION



PRIVATE YARD ELEVATION

MATERIAL SCHEDULE

1. ROOF - CONCRETE S TILE
2. FASCIA - 2X RESAWN WOOD
3. 1/2 SAND FINISH STUCCO
4. DECORATIVE METAL RAILING
5. VINYL WINDOW W/ STUCCO TRIM
6. STUCCO CONTROL JOINT
7. EXTERIOR LIGHT FIXTURE
8. DECORATIVE SHUTTERS
9. DECORATIVE GABLE ACCENT
10. DECORATIVE METAL POTSHELF
11. SECTIONAL GARAGE DOOR
12. ARCHED RECESS



FRONT ELEVATION



DRIVE ELEVATION



ENHANCED SIDE ELEVATION AT FLETCHER

SEE PLAN SHEET A-1 FOR OFFSET ENTRY DOOR ALIGNMENTS, TYP. AT UNIT TO UNIT LOCATIONS



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4. CLASS 32 INFILL EXEMPTION REQUIREMENTS

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and, as a result, are exempt from review under CEQA.

Class 32 Infill Exemption

One of the classes of projects exempt from CEQA review are projects that are specified as urban infill development. CEQA Guidelines Section 15332 defines the Class 32 Infill Exemption as a project that meets the following five requirements:

- a) **General Plan and Zoning Consistency:** The project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.
- b) **Project Location, Size, and Context:** The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.
- c) **Endangered, Rare, or Threatened Species:** The project site has no value as habitat for endangered, rare, or threatened species.
- d) **Significant Effects:** Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- e) **Utilities:** The site can be adequately served by all required utilities and public services.

Exceptions

In addition to meeting the five requirements stated above, the CEQA Guidelines Section 15300.2 provides specific instances where exceptions apply to a project that would otherwise meet the requirements for an exemption. These exceptions are:

- a) **Location:** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located. A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.
- b) **Cumulative Impact:** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- c) **Significant Effects:** A Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d) **Scenic Highways:** A Categorical Exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- e) **Hazardous Waste Sites:** A Categorical Exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

- f) **Historical Resources:** A Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

4.1. **Proposed Project CEQA Exemption**

The analysis below provides substantial evidence that the proposed Project properly qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment. Additionally, the analysis shows there are no applicable exceptions to qualifying for the Categorical Exemption, as identified in CEQA Guidelines Section 15300.2 and discussed in the following Section 4.2, *Exceptions for Exemptions*.

a. Criterion Section 15332(a): General Plan and Zoning Consistency: The Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.

As described above, the Project site is designated as LMDR by the City of Orange General Plan and is zoned R-3 by the City of Orange. The LMDR designation allows 6.1 to 15 du/ac and accommodates a range of residential types, including small-lot single-family homes, duplexes, and lower-intensity multifamily housing. The R-3 zoning designation permits apartments, condominiums, and townhomes, with development standards intended to balance higher-density residential use with minimum ground coverage and adequate open space. The R-3 zone also permits Small Lot Subdivisions pursuant to Section 17.14.270 of the City of Orange Municipal Code, which establishes development standards to accommodate alternative housing types within multifamily and certain mixed-use zones. Small Lot Subdivisions under the R-3 zone allow residential development at densities of 6 to 15 du/ac.

The proposed Project consists of a 15-lot subdivision, which includes 14 market-rate units, and one unit reserved for a very low-income household, as permitted under the State Density Bonus Law and the City's implementing ordinance (City of Orange Municipal Code Chapter 17.14). The provision of one unit reserved for a very low-income household (representing nine percent of the proposed Project) allows the applicant to receive a 30 percent density bonus, which increases the proposed Project from the base allowable 11 units (calculated under the R-3 designation at 15 du/acre) to a total of 15 units. The proposed Project's density, including the additional units achieved through the application of a density bonus, is consistent with the City's adopted housing policies and the density range identified in the General Plan.

While the Project proposes a series of waivers and reductions from the development standards outlined in the Zoning Code (City of Orange Municipal Code Chapter 17.14), these modifications are authorized by the Density Bonus Law (Government Code Section 65915) and the City's Density Bonus Ordinance (City of Orange Municipal Code Chapter 17.15). Such waivers are not considered deviations that would render the proposed Project inconsistent with the General Plan or zoning regulations but rather are expressly permitted adjustments that facilitate the construction of affordable housing consistent with State housing policy. Therefore, despite the proposed Project's request for relief from certain site development standards (such as minimum lot size, setbacks, lot dimensions, and open space requirements), the proposed Project remains fully consistent with the land use designation and zoning regulations as modified by applicable State and local affordable housing provisions.

Table 4-1 shows the proposed Project’s consistency with the City of Orange Zoning Ordinance for the Small Lot Subdivision zoning development standards, as listed in Chapter 17.14.270 of the City of Orange Municipal Code. As shown, the proposed Project would meet all of the requisite development standards, including lot size, setback, landscaping, and parking requirements, with the modifications authorized by the Density Bonus Law and the City’s Density Bonus Ordinance. Therefore, the proposed Project would be consistent with the applicable zoning regulations.

Table 4-1: City of Orange Zoning Development Standards for Small Lot Subdivision (Municipal Code Chapter 17.14.270)

Development Feature	R-3 (Small Lot Subdivision) Zoning Requirement	Incentive / Waiver	Proposed Project Consistency
Dwelling units per acre	6-15 dwelling units per acre	No	Consistent. The proposed Project would construct 15 single-family detached residential units on the 0.72-acre site, which would result in a density of 20.83 du/acre. The proposed Project would consist of 14 market-rate units and one very low-income affordable unit. The inclusion of the affordable units qualifies the proposed Project for a density bonus under California’s Density Bonus Law (Government Code Section 65915) and awards the proposed Project a 30 percent density bonus, equivalent to four bonus units.
Lot Coverage	Maximum: 75 percent	No	Consistent. The maximum lot coverage would be 60 percent, as shown in Figure 3-1, <i>Conceptual Site Plan</i> .
Dwelling unit per lot	1 dwelling unit per lot	No	Consistent. The proposed Project would develop a single unit per lot, as shown in Figure 3-1, <i>Conceptual Site Plan</i> .
Minimum Setbacks	Front yard: 15 ft Side yard: 5 ft Interior side yard: 0 ft Rear yard: 10 ft	Yes	Consistent. The proposed residential units would include a minimum front setback of 8 feet and 6 inches from Fletcher Avenue, a side setback of 5 feet from the adjacent residential uses, and a rear setback of 7 feet and 6 inches from the adjacent residential uses, as shown in Figure 3-1, <i>Conceptual Site Plan</i> . However, as described above, the City shall not apply any development standard that would have the effect of physically precluding the construction of a housing development that meets the eligibility criteria of Chapter 17.15, <i>Density Bonus</i> , at the densities and with the incentives or

Development Feature	R-3 (Small Lot Subdivision) Zoning Requirement	Incentive / Waiver	Proposed Project Consistency
			<p>concessions permitted under this chapter or as otherwise allowed under Government Code Section 65915.</p> <p>As such, the reduced minimum setbacks are consistent with the provisions of the State Density Bonus Law and the City’s implementing regulations.</p>
Building Height	Maximum: 35 ft and 3 stories	No	<p>Consistent. The proposed residences would be three stories with a maximum height of approximately 35 feet, measured from finish grade to top of the highest roof ridges.</p>
Minimum Open Space	Private: 150 square feet per dwelling unit	No	<p>Consistent. The proposed Project would provide approximately 4,455 square feet of private yard open space, equating to about 300 square feet per unit.</p>
Parking	<p>2 parking spaces per unit, either enclosed or covered (i.e. garage or carport). For units with 4 or more bedrooms, 1 additional space shall be provided on the lot, which may be enclosed or unenclosed.</p> <p>Required: 45 stalls</p>	Yes	<p>Consistent. The proposed Project would provide a total of 39 parking spaces. The proposed Project would include a two-car enclosed garage for each of the proposed units, totaling 30 garage spaces, along with nine open parking spaces.</p> <p>California's State Density Bonus law allows reduced parking ratios that override local parking codes, and do not require a waiver, concession, or discretionary approval. These are predefined, by-right reduced parking standards that apply automatically when a project qualifies under State Density Bonus law.</p> <p>As such, the proposed parking is consistent with the provisions of the State Density Bonus Law and the City’s implementing regulations.</p>

Source: (City of Orange, 2025)

Municipal Code Chapter 17.14.270, Small lot Subdivision Development Standards

Municipal Code Chapter 17.14.270, Required Number of Parking Spaces

b. Criterion Section 15332(b): Project Location, Size, and Context: The proposed development occurs within City limits on a Project site of no more than 5 acres substantially surrounded by urban uses.

The proposed Project is within the limits of the City of Orange on a 0.72-acre site located northeast of the intersection of North Batavia Street and West Fletcher Avenue at 715 West Fletcher Avenue. The Project site is bordered by West Fletcher Avenue followed by industrial uses to the south, and residential uses to the east, west, and north, as shown on Figure 2-2, *Local Vicinity*. As the Project site is less than 5 acres and substantially surrounded by urban uses, it meets the criteria of CEQA Guidelines Section 15332(b).

c. Criterion Section 15332(c): Endangered, Rare, or Threatened Species: The Project site was determined to have no value as habitat for endangered, rare or threatened species.

The Project site is vacant and undeveloped, with no active land uses. Vegetation is limited to scattered non-native grasses, and the site has been heavily disturbed by past development and grading activities, resulting in primarily bare ground with no native habitat. Existing features include a 12-foot concrete wall along the northern and eastern boundaries and a 6-foot chain link fence along the western boundary. The site is located within a fully urbanized area, surrounded by residential uses to the north, east, and west, and by West Fletcher Avenue followed by industrial development to the south. Given the disturbed condition of the site and lack of native vegetation, the Project site does not contain suitable habitat for endangered, rare, or threatened species. Furthermore, because the Project site does not contain any trees, implementation of the proposed Project would not conflict with any local policies or ordinances intended to protect biological resources, including trees.

For the reasons described above, the proposed Project site has no value as habitat for endangered, rare, or threatened species and meets the criteria of CEQA Guidelines Section 15332(c).

d. Criterion Section 15332(d): Significant Effects: Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts, aiming to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines which states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and shall apply statewide beginning on July 1, 2020.

VMT Screening Criteria

The City of Orange is the Lead Agency responsible for identifying potential impacts associated with the development of the proposed Project in accordance with CEQA requirements. According to the *City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2025) (“City TIA Guidelines”), certain types of projects, because of their size, nature, or location, are presumed to be exempt from further analysis and result in a less than significant VMT impact. The City TIA Guidelines establish screening thresholds for certain types of

projects that may be presumed to cause a less than significant VMT impact based on substantial evidence provided in the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA*. The City TIA Guidelines specify the following screening thresholds: Transit Priority Area (TPA) Screening; Low VMT Area Screening; and Project Type Screening. Specifically, residential and office projects located within a Low VMT Area Screening zone are presumed to result in a less than significant impact, unless substantial evidence demonstrates otherwise.

VMT Screening Analysis

A Trip Generation and Vehicle Miles Traveled Screening Analysis was prepared for the proposed Project to determine the applicability of the City of Orange Traffic Impact Analysis Guidelines (Appendix A). The purpose of the analysis is to determine whether a project would be considered to have a less-than significant impact based on VMT screening thresholds and therefore could be screened from further analysis.

The analysis determined that the proposed Project is not located within a transit priority area. As such, the Project does not meet Step 1: Transit Priority Area (TPA) Screening Criteria. In addition, the proposed Project is not a land use type identified for Step 3: Project Type Screening Criteria and, therefore, does not meet the screening. However, the analysis determined that the proposed Project's Traffic Analysis Zone (TAZ) per service capita VMT does not exceed the City of Orange General Plan Buildout VMT per service population; therefore, the Project is located within a low VMT area.

To identify if the Project is located in a low VMT-generating area, the analysis utilizes Orange County Transportation Analysis Model (OCTAM) 5.0 to compare the appropriate baseline project TAZ VMT to the City's adopted threshold of significance (i.e., City of Orange General Plan Buildout VMT per service population). The Project site is located within OCTAM TAZ 568. As summarized in Table 4-2 below, TAZ 568 has an existing zonal VMT of 18.7 VMT per service population, which is below the City of Orange's adopted threshold of 25.6 VMT per service population (based on the City's General Plan Buildout VMT per service population). Because the Project's TAZ VMT does not exceed the City's threshold, the proposed Project is considered to be located within a low VMT-generating area. Thus, the proposed Project is presumed to have a less-than-significant impact on VMT according to the City's Guidelines for VMT analysis.

The proposed Project would not result in any significant effects relating to traffic; therefore, the proposed Project meets the traffic-related criteria of CEQA Guidelines Section 15332(d).

Table 4-2: Low VMT Screening Assessment

Project TAZ	Year	Total VMT (OD)	Service Population	VMT Per Service Population
568	2019	68,778.4	3,712	18.5
	2050	68,369.8	3,475	19.7
	2025	68,699.3	3,666	18.7
City of Orange VMT Threshold of Significance				25.6
Potentially Significant Impact? (Yes/No)				No

Source: ITE Trip Gen Annual (11th Addition)

Source: Trip Generation and VMT Screening Analysis (Appendix A).

Trip Generation

The Project’s trip generation was calculated using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11th Edition* (2025). The Project’s proposed 14 market rate residential units were analyzed using the Single Family Detached Residential land use code (ITE Land Use Code 210), and the one affordable unit was analyzed using the Affordable Housing land use code (ITE Land Use Code 223).

As shown in Table 4-3 below, operation of the proposed Project would generate 132 daily trips including 10 trips during the AM peak hour and 13 trips during the PM peak hour.

Table 4-3: Project Trip Generation

Land Use (ITE Code)	Quantity	AM			PM			Daily
		In	Out	Total	In	Out	Total	
Market Rate Dwelling Units (210)	14	3	7	10	8	5	13	127
Very Low-Income Dwelling Unit (223)	1	0	0	0	0	0	0	5
Total		3	7	10	8	5	13	132

Source: ITE Trip Gen Annual (11th Addition)

Source: Trip Generation and VMT Screening Analysis (Appendix A).

Noise

To support the Class 32 Categorical Exemption findings for the proposed Project, EPD Solutions, Inc. prepared a Noise and Vibration Impact Analysis, dated November 2025 (Appendix B), that evaluates potential noise-related impacts to surrounding land uses as a result of the implementation of the Project.

Noise Terminology

Various noise descriptors are utilized in this noise analysis, and are summarized as follows:

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically 1 hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

CNEL: The Community Noise Equivalent Level (CNEL) is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 pm to 10:00 pm and after an addition of 10 dBA to noise levels between the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

Ambient Noise: The “ambient noise level” is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Significance Criteria

As described in more detail in Appendix B, the City’s General Plan guidelines and Municipal Code regulations identify noise compatibility and establish noise standards that are implemented as thresholds. However, the existing City regulations do not identify levels of ambient noise increases that are considered substantial or vibration criteria during construction. Thus, information gathered from Municipal Codes from various jurisdictions and the *Transportation and Construction Vibration Manual* were utilized (Appendix B). Table 4-4, *Significance Criteria Summary*, provides a summary of thresholds used in the noise analysis.

Table 4-4: Significance Criteria Summary

Analysis	Conditions	Significant Criteria	
		Daytime	Nighttime
Off-Site Traffic ¹	If ambient is < 60 dBA CNEL	≥ 5 dBA CNEL Project Increase	
	If ambient is 60-65 dBA CNEL	≥ 3 dBA CNEL Project Increase	
	If ambient is > 65 dBA CNEL	≥ 1.5 dBA CNEL Project Increase	
Operational ²	Exterior Noise Level Standards for Single Family Residence	60 dBA CNEL	
	Exterior Noise Level Standards for Multi-Family Residence	65 dBA Ldn	
Construction	Limit construction activities which impact adjacent residential uses to the hours of 7 A.M. to 8 P.M. during weekdays and Saturdays. ²		
	Noise Level Threshold ³	80 dBA $L_{eq,equip}(8hr)$	70 dBA $L_{eq,equip}(8hr)$

Analysis	Conditions	Significant Criteria	
		Daytime	Nighttime
	Noise Level Increase ⁴	20 dBA L _{eq}	
	Construction Vibration Damage Criteria ⁵	0.5 PPV (inches/second) ⁶	
		0.3 PPV (inches/second) ⁷	

1. City of Orange. (2010). *City of Orange Noise Element*.
2. City of Orange Municipal Code, Section 8.24.040. Exterior Standards.
3. City of Orange. (2010). *City of Orange Noise Element*.
4. City of Orange Municipal Code. 8.24.050. Exemptions from Chapter Provisions.
5. FTA. (2018). *Transit Noise and Vibration Impact Assessment Manual*.
6. Caltrans. (2020). *Transportation and Construction Vibration Guidance Manual*. For older residential structures. Source: Noise and Vibration Impact Analysis (Appendix B)

Noise Impacts

Construction

Construction of the proposed Project is anticipated to occur over one phase lasting approximately 12 months and would involve site preparation, grading, building construction, paving, and architectural coatings. These activities would require the use of heavy equipment that would increase noise levels in the immediate area. However, the noise from construction activity would fluctuate depending on the particular type, number, and duration of use of construction equipment. Additionally, noise associated with construction of the Project would be temporary in nature and would cease upon completion of the Project.

Table 4-5 below lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 and 75 feet between the equipment and a noise receptor. As shown, noise levels generated by heavy construction equipment can range from approximately 75 dBA to 90 dBA when measured at 50 feet and 70.2 dBA to 80 dBA when measured at 75 feet.

Table 4-5: Typical Construction Equipment Noise Levels

Activity	Equipment ¹	Maximum Noise Level @ 50 Feet ^{2,3}	Noise Level @ 75 Feet ^{2,3}
		dBA L _{max}	dBA L _{eq}
Site Preparation	Rubber Tired Dozers	85	80.0
	Grader	85	
	Crawler Tractors	84	
Grading	Graders	85	80.0
	Rubber Tired Dozers	85	
	Crawler Tractors	84	
Building Construction	Cranes	81	79.5
	Forklift	75	

Activity	Equipment ¹	Maximum Noise Level @ 50 Feet ^{2,3}	Noise Level @ 75 Feet ^{2,3}
		dB A L _{max}	dB A L _{eq}
	Tractors/Loaders/Backhoe	84	
Paving	Pavers	85	77.3
	Paving Equipment	90	
	Rollers	85	
Architectural Coating	Air Compressors	80	70.2

Source: Noise and Vibration Impact Analysis (Appendix B)

The nearest sensitive receptors to the Project site are residences located adjacent to the western Project site boundary (75 feet from the center of the site and 15 feet from the nearest construction activities). Other noise sensitive land uses near the Project site are located at greater distances than those listed above and would experience lower noise levels due to the additional attenuation from distance and the shielding of intervening structures, such as the 12-foot-high concrete wall along the northern and eastern property line.

Construction noise was analyzed from the center of the Project site because construction equipment is mobile and operates throughout the site rather than at a fixed point. Using the center provides a conservative and standardized method that reasonably represents average noise conditions for nearby sensitive receptors. The construction noise analysis also assumes the two loudest pieces of equipment are operating together. Furthermore, there is a 6-foot-tall chain fence with vegetation located along the western perimeter of the Project site, which would reduce noise during construction by approximately 1.5 dBA, and the existing 12-foot-wall concrete wall along the northern and eastern boundaries of the site would reduce noise levels by at least 5 dBA (Appendix B). This shielding effect has been incorporated into the analysis. Therefore, noise generated during construction activities is estimated to range between 68.7 to 78.5 dBA at the nearest sensitive receptors, which would not exceed the 80 dBA threshold during daytime, as shown in Table 4-6 below. As such, construction-related noise impacts would be considered less than significant.

Table 4-6: Construction Noise Level at the Nearest Sensitive Receptor

Sensitive Receptors	Distance Between Geographic Center of Project Site (feet)	Noise Level L _{eq} (dBA)		Exceed the Thresholds?
		Highest Noise Level	Threshold	
Residential to West	75	78.5	80	No

Source: Noise and Vibration Impact Analysis (Appendix B)

To identify the temporary Project construction noise level contributions to the existing ambient noise environment, the proposed Project construction noise levels were combined with the existing ambient noise level measurements as shown in Table 4-7 below. The difference between the combined Project-construction and ambient noise levels is used to describe the construction noise level contributions.

Table 4-7: Construction Noise Level Increases at the Nearest Sensitive Receptor

Sensitive Receptors	Noise Level L_{eq} (dBA)				Exceed the Thresholds?
	Highest Noise Level	Ambient Noise Level	Construction Increase	Threshold	
Residential to West	78.5	65.5	13	20	No

Source: Noise and Vibration Impact Analysis (Appendix B)

As shown in Table 4-6, proposed Project construction activities would not result in ambient noise level increases during the daytime hours at the nearest receiver locations, which would not exceed the 20 dBA L_{eq} construction noise level increase threshold. Thus, temporary construction noise level increases from construction would be less than significant. Additionally, as described above, Project construction would be restricted to between the hours of 7:00 a.m. and 8:00 p.m. on any day except for Sundays and federal holidays, or between the hours of 9:00 a.m. and 8:00 p.m. on Sundays and federal holidays, in compliance with the City’s Municipal Code.

Operation

The ongoing operation of the proposed Project is anticipated to generate nonhuman noise sources from automobiles traveling to and from the Project site and from on-site heating, ventilation, and air conditioning (HVAC) equipment. Based on the modeling results, the proposed Project would generate operational noise levels of approximately 45.4 dBA during the daytime and 44.5 dBA during the nighttime at the site boundary, which would not exceed the City’s thresholds of 55 dBA and 45 dBA due to stationary sources, respectively (Appendix B).

To identify operational ambient noise level increases from the Project, the Project’s operational noise levels are combined with the existing ambient noise levels measurements. The difference between the combined Project and ambient noise levels identifies the Project noise level increase. Based on the noise modeling results, operational noise generated by HVAC equipment and parking activities would be approximately 45.9 dBA during daytime hours and 44.7 dBA during nighttime hours at the Project boundary (Appendix B). These noise levels would not exceed the City’s exterior noise standards of 55 dBA during the daytime and 50 dBA during the nighttime for residential properties. Further, as ambient noise levels in the Project vicinity range from approximately 47.1 to 65.6 dBA L_{eq} , Project-related operational noise would be below the existing ambient noise environment and would not result in a measurable increase in overall noise levels (Appendix B). The incremental Project operational noise level increase is considered less than significant at all receiver locations.

Traffic Noise

Traffic generated by the operation of the proposed Project has the potential to influence the traffic noise levels in surrounding off-site areas and at the Project site. Vehicle noise is a combination of the noise produced by the engine, exhaust and tires. The level of traffic noise depends on three primary factors: (1) the volume of traffic; (2) the speed of traffic; and (3) the number of trucks in the flow of traffic. The proposed Project does not propose any uses that would require truck trips and the proposed Project would not alter the speed limit on any existing roadway; so, the proposed Project’s potential off-site noise impacts have been focused on the noise impacts associated with the change of volume of traffic that would occur with development of the proposed Project.

Roadway segment noise levels for the “Existing” and “Existing with Project” scenarios were compared to evaluate Project-related operational noise impacts. As shown in Table 4-8, the noise level under the “Existing” scenario at a distance of 100 feet from the roadway centerline is 51.2 dBA. With the addition of the proposed Project, the noise level would be 51.5 dBA. The increase due to the proposed Project would be 0.3 dBA, which would not exceed the 3 dB threshold along Fletcher Avenue. Furthermore, the traffic noise with the proposed Project would be less than the standard of 65 dBA. As such, impacts would be less than significant.

Table 4-8: Existing Plus Project Traffic Noise Levels

Roadway Segment	Existing		Existing Plus Project				Increase over Existing Scenario (dBA)
	Existing ADT ¹	dBA @ 100 feet from Roadway Centerline	Existing Plus Project ADT ²	dBA @ 100 feet from Roadway Centerline	Centerline to 60 dBA CNEL (feet)	Centerline to 55 dBA CNEL (feet)	
Fletcher Avenue	1,695	51.2	1,827	51.5	-	59	0.3

Notes: ADT= average daily traffic; CNEL=Community Noise Equivalent Level; dBA=A-weighted decibels.
Source: Noise and Vibration Impact Analysis (Appendix B)

Aircraft Noise

The closest airport to the Project site is Fullerton Municipal Airport, located approximately 7.2 linear miles southwest of the Project site. However, the Project site lies well outside the Fullerton Municipal Airport 60 dBA CNEL noise contour (Airport Land Use Commission, 2019). Therefore, the proposed Project would not be exposed to excessive aircraft noise and impacts would be less than significant.

Ground-Borne Vibration

Construction activities can generate varying levels of ground vibration depending on the equipment used and the methods employed. These vibrations propagate through the ground and decrease in intensity with distance. Buildings in the vicinity of the construction site respond to these vibrations with varying results ranging from no perceptible effects at the low levels to slight damage at the highest levels. Table 4-9 provides vibration levels for particular construction activities at a distance of 25 and 15 feet.

Table 4-9: Construction Equipment Vibration Levels

Equipment	Reference Vibration Level at 25 Feet (PPV [inches/second])¹	Vibration Level at 15 Feet (PPV [inches/second])²
Large Bulldozer	0.089	0.191
Loaded Trucks	0.076	0.191
Small Bulldozer	0.003	0.012

Source: Noise and Vibration Impact Analysis (Appendix B)

Based on the equipment list in Table 4-5 above, the proposed Project construction would use the following vibration-heavy equipment on-site: rubber tired dozers, loaded trucks, and graders (generates similar vibration as large bulldozer). The nearest residential structure would be located as close as 15 feet from the construction activities, which would generate a vibration level of 0.191 from a large bulldozer, which would be the most vibrating piece of equipment used by Project construction. As shown in Table 4-8, the vibration level at the nearest residential structure would range from 0.012 to 0.191 PPV (inches per second), which would not exceed the threshold of 0.3 inches per second established by the FTA. As such, the vibration impacts during construction would be less than significant.

The Project proposes a 15-unit single-family residential development, which would not involve railroads or substantial heavy truck operations that are typically associated with significant operational vibration. Operation of the residences would include heavy trucks for residents moving in and out of the units and garbage trucks for solid waste disposal, which would not be frequent daily activities. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. Garbage trucks and delivery trucks on-site would be travelling at very low speeds, so it is expected that garbage truck vibration at nearby sensitive receptors would not be noticeable. Therefore, operational vibration impacts would be less than significant.

Overall, the proposed Project would not result in any significant effects relating to noise or vibration; therefore, the proposed Project meets this criterion related to noise and vibration of CEQA Guidelines Section 15332(d).

Air Quality

To support the Class 32 Categorical Exemption findings for the proposed Project, EPD Solutions, Inc. prepared a report dated November 2025 that evaluates potential air quality-related impacts as a result of the implementation of the proposed Project (see Appendix C).

Air Quality Management Plan Consistency

The Project site is located in the South Coast Air Basin (SCAB), which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the regional Air Quality Management Plan (AQMP), which addresses federal and State Clean Air Act (CAA)

requirements. The AQMP details goals, policies, and programs for achieving air quality standards and healthful air in the SCAB. In preparation of the AQMP, SCAQMD and SCAG use land use designations contained in General Plan documents from local agencies to forecast, inventory, and allocate regional emissions from land use and development-related sources.

As described in Chapter 12, in Section 12.2 and Section 12.3, of the SCAQMD's *CEQA Air Quality Handbook* (1993), for purposes of analyzing consistency with the AQMP, if a project would have a development density and vehicle trip generation that is substantially greater than what was anticipated in the General Plan, then the project would conflict with the AQMP. On the other hand, if a project's density is consistent with the General Plan, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

As discussed previously, the proposed Project qualifies for concessions and increased density under California's Density Bonus Law (Government Code Section 65915). As such, the proposed Project is considered consistent with applicable land use policies, including for the purposes of evaluating air quality plan consistency. The AQMP relies on general plan and zoning assumptions for growth forecasts; however, projects that utilize state-mandated density bonuses are considered consistent with the AQMP so long as they do not exceed regional growth projections or conflict with the overarching goals of the Plan. As a result, the proposed Project would also be consistent with the assumptions in the AQMP and would not conflict with SCAQMD's attainment plans.

In addition, emissions generated by construction and operation of the proposed Project would not exceed significance thresholds, as shown below in Tables 4-9 through 4-11. As described in the analysis below, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. Therefore, the proposed Project is consistent with the AQMP, and impacts would be less than significant.

Regional Construction Emissions

Construction activities associated with the proposed Project would generate pollutant emissions from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. The quantity of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring. In addition, the proposed Project would generate a need for construction worker vehicle trips to and from the Project site during the estimated 12 months of construction.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 402, which prohibits discharge of air contaminants that cause injury, nuisance, or annoyance to the public or damage to property. Rule 403 aims to control fugitive dust as well as particulate matter (particulate matter 10 microns in diameter [PM₁₀] and particulate matter 2.5 microns in diameter [PM_{2.5}]) emissions from construction activities and its requirements include, but are not limited to: applying water in sufficient quantities to prevent the generation of visible dust plumes; applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible; utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site; covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches; and maintaining effective cover over exposed areas. In addition, implementation of

SCAQMD Rule 1113 which governs the volatile organic compound (VOC) content in architectural coating, paint, thinners, and solvents, would be required.

Regional construction emissions associated with the proposed Project were modeled using the most recent version of the California Emissions Estimator Model (CalEEMod) and are presented in Table 4-9. As shown in Table 4-10, CalEEMod results show that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds for criteria pollutants. Therefore, construction emissions would result in a less-than-significant impact.

Table 4-10: Regional Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
2027 (Year 1)						
Site Prep	1.47	12.65	13.28	0.02	2.71	1.51
Grading	1.47	12.65	13.28	0.02	2.71	1.51
Building Construction	0.71	6.57	9.24	0.02	0.33	0.25
2027 Maximum Daily Emissions	1.47	12.65	13.28	0.02	2.71	1.51
2028 (Year 2)						
Building Construction	0.68	6.16	9.19	0.02	0.31	0.23
Paving	0.63	4.92	6.95	0.01	0.41	0.22
Architectural Coating	8.43	1.08	1.53	<0.01	0.03	0.02
2028 Maximum Daily Emissions	8.43	6.16	9.19	0.02	0.41	0.23
Maximum Daily Emission 2025-2026	8.43	12.65	13.28	0.02	2.71	1.51
SCAQMD Significance Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter

Source: Air Quality Impact Analysis (Appendix C).

Regional Operational Emissions

Development and operation of the proposed Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with mobile sources (emissions from vehicle trips) and area sources (landscaping, applications of architectural coatings, and consumer products).

Regional operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table 4-11. As shown, the proposed Project would not result in long-term regional emissions of criteria pollutants that would exceed the SCAQMD’s applicable thresholds. Therefore, impacts would be less than significant.

Table 4-11: Net Regional Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile	0.46	0.40	4.90	0.01	1.40	0.36
Area	0.68	0.01	0.85	<0.01	<0.01	<0.01
Energy ¹	0.00	0.00	0.00	0.00	0.00	0.00
Total Operational Emissions	1.15	0.41	5.75	0.01	1.40	0.36
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

Notes: ROG = reactive organic gases, NOx = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter

¹Since the Project does not include natural gas, the estimated natural gas consumption is converted to electricity-equivalent using a factor of 0.18 and added to the electricity consumption.

Source: Air Quality Impact Analysis (Appendix C).

Localized Significant Thresholds (LST)

The SCAQMD recommends the evaluation of localized nitrogen oxide (NOx), carbon monoxide (CO), PM₁₀, and PM_{2.5} construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. These thresholds set the maximum rates of daily construction or operational emissions from a project site that would not exceed a national or State ambient air quality standard. The thresholds are determined by the Source Receptor Area (SRA), size of grading disturbance, and distance to nearest receptor. SCAQMD provides screening tables (Appendix C of the SCAQMD 2008 *Final Localized Significance Threshold Methodology*) for projects that disturb less than or equal to 5 acres in a day.

Sensitive receptors can include uses such as long-term health care facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered sensitive receptors. The nearest LST sensitive receptor to the Project site is a residential home located immediately adjacent to the Project site's western boundary. Therefore, the construction emission thresholds for the lowest distance available (25 meters) were used.

Construction

Table 4-12 presents the results of the localized construction emissions for 2027 and 2028 compared against the SCAQMD localized thresholds. As shown, the proposed Project would not exceed SCAQMD's localized significance thresholds. Therefore, localized construction air quality impacts would be less than significant.

Table 4-12: Localized Construction Emissions

Construction Activity	Maximum Daily Regional Emissions (pounds/day)			
	NOx	CO	PM ₁₀	PM _{2.5}
2027 (Year 1)				
Site Prep	12.63	12.96	2.61	1.48
Grading	12.63	12.96	2.61	1.48
Building Construction	6.51	8.94	0.25	0.23
2027 Maximum Daily Emissions	12.63	12.96	2.61	1.48
2028 (Year 2)				
Building Construction	6.10	8.95	0.22	0.20
Paving	4.87	6.25	0.19	0.17
Architectural Coating	1.08	1.49	0.02	0.02
2028 Maximum Daily Emissions	6.10	8.95	0.22	0.20
Maximum Daily Emission 2027-2028	12.63	12.96	2.61	1.48
SCAQMD Significance Thresholds	81.00	485.00	4.00	3.00
Threshold Exceeded?	No	No	No	No

Notes: NOx = nitrogen oxides, CO = carbon monoxide, PM₁₀ = particulate matter 10 microns in diameter, PM_{2.5} = particulate matter 2.5 microns in diameter

Source: Air Quality Impact Analysis (Appendix C).

Operational

According to the SCAQMD LST methodology, LSTs apply to stationary and on-site mobile sources from a project. Projects that involve mobile sources that spend extended periods queuing and idling at a site, such as transfer facilities or warehousing and distribution buildings, have the potential to exceed the operational LSTs. Residential uses do not typically involve diesel vehicles regularly idling or queuing for long periods. Therefore, due to the lack of significant stationary source emissions or idling diesel-powered vehicles, impacts related to operational LSTs are presumed to be less than significant.

Water Quality

The Project site is located within the Lower Santa Ana River Watershed and is under the jurisdiction of the Santa Ana Regional Water Quality Control Board (SARWQCB), which sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act (CWA) to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). Water quality standards for all ground and surface waters overseen by the SARWQCB are documented in its Basin Plan (Santa Ana Basin Plan), and the regulatory program of the SARWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Construction

Construction of the proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would use heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff could wash into and pollute waters.

Construction of the proposed Project would not disturb more than one acre of soil; therefore, the proposed Project would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity. However, pursuant to the requirements of the City of Orange Municipal Code Chapter 7.01, *Water Quality and Stormwater Discharges*, the Project Applicant would still be required to comply with local stormwater and water quality regulations. Construction activity subject to local regulations includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. For example, the proposed Project would be required to comply with the City's grading and erosion control ordinances included in the City of Orange Municipal Code Chapter 16.40, *Grading Requirements*, which would be ensured by the City's plan check and permitting process. Furthermore, the proposed Project would be required to implement best management practices (BMPs) for erosion and sediment control during construction such as:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to existing requirements and implementation of appropriate BMPs, as ensured through the City's permitting process, would minimize potential water quality degradation associated with construction activities, prevent violations of water quality standards or waste discharge requirements, and result in less-than-significant impacts.

Operation

The proposed Project would introduce pollutants such as trash and debris, oil and grease from vehicles, and pesticides and sediments from landscaping. These pollutants could potentially discharge into surface waters and result in degradation of water quality. Thus, the proposed Project would be required to comply with existing regulations that limit the potential for pollutants to discharge from

the site. Pursuant to the NPDES and Orange Municipal Code Chapter 7.01, *Water Quality and Stormwater Discharges*, a project specific WQMP would be prepared prior to issuance of grading or building permits. The WQMP would specify low impact development (LID) practices and post-construction BMPs that would be incorporated into the project design to capture and treat stormwater runoff to reduce pollutants of concern before conveying the stormwater to the City's storm drain system, and ultimately to the Santa Ana River. The proposed Project would also be subject to other applicable requirements of the City of Orange Municipal Code Chapter 7.01, including regulations related to stormwater discharge, prohibited discharges, and requirements to implement and maintain BMPs. Adherence to these statutory requirements and long-term maintenance of BMPs would ensure that water quality and waste discharge requirements are not violated.

For the purposes of stormwater quality, the Project proposes a combination of on-site infiltration galleries and underground drainage infrastructure designed to comply with applicable municipal stormwater management standards. The proposed Project would include the installation of a four inch, and eight-inch storm drain line on-site, designed to convey stormwater runoff to an underground storm tank. Stormwater would be collected on-site through a series of grate inlets and catch basins, which would direct flows into the underground storm drain system. The underground storm tank would be located beneath the private internal roadway. The catch basins, located in the driveway, will have pre-treatment filters installed to capture large particulates and some oils and grease present in the runoff. The proposed drainage system would also remove coarse sediment, trash, and pollutants (i.e., sediments, nutrients, heavy metals, oxygen demanding substances, oil and grease, bacteria, and pesticides). Proposed stormwater facilities would be designed to manage runoff for both water quality treatment and the 2-year, 10-year, 25-year, and 100-year storm events for drainage and flood control. Post-development runoff volumes (after infiltration) would be less than pre-development volumes for these storm events, demonstrating a beneficial effect on stormwater quantity (Appendix D). Therefore, the proposed improvements would ensure that post-development runoff rates and volumes do not exceed pre-development conditions.

With implementation of the operational source and treatment control BMPs that are outlined in the preliminary WQMP (Appendix E) that would be reviewed and approved by the City during the permitting and approval process, potential pollutants would be reduced to the maximum extent feasible, and implementation of the proposed Project would not substantially degrade water quality.

Overall, the proposed Project would not result in any significant effects relating to water quality; therefore, the proposed Project meets the water quality related criteria of CEQA Guidelines Section 15332(d).

e. Criterion Section 15332(e): Utilities: The site can be adequately served by all required utilities and public services.

The utilities necessary to construct and operate the proposed Project (electric, gas, trash, water, and sewer) would be adequately provided by existing utility service systems. The Project site is located in an urbanized and developed area. The proposed Project would connect to existing underground water, sewer, and drainage utility lines surrounding the Project site within West Fletcher Avenue. The proposed Project would install a new 3-inch water line on-site that would connect to the existing 12-inch water line in West Fletcher Avenue. In addition, the proposed Project would install a new 6-inch on-site sewer line on-site that would connect to the existing 8-inch sewer line in West Fletcher Avenue. The proposed Project would be serviced by Southern California Edison (SCE) for electricity.

Given the size of the proposed Project and its location within an area that is currently served by utilities, the site can be adequately served by all required utilities and public services. Therefore, the proposed Project meets the criteria of CEQA Guidelines Section 15332(e).

4.2. Exceptions for Exemptions

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exceptions to qualifying for the Class 32 Categorical Exemption for an infill project are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

a. Criterion 15300.2(a): Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.

The proposed Project does not qualify for an exemption under Classes 3, 4, 5, 6, or 11. The proposed Project is located within an urban developed area and is not located within a sensitive environment. In addition, the proposed Project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under criterion 15300.2(a) is not applicable.

b. Criterion 15300.2(b): Cumulative Impact: All exemptions for these classes are inapplicable when the cumulative impact of successive projects with similar uses over a similar geological area, over time is significant.

As discussed in Section 4.1, *Proposed Project CEQA Exemption*, the proposed Project meets the requirements of CEQA Guidelines Section 15332. The proposed Project would subdivide the site and develop 15 single-family residential lots. The Project site is already served by utilities and public services, as well as transportation. Any construction effects would be temporary, confined to the Project vicinity, and reduced to a less-than-significant level by implementing existing applicable regulatory requirements. Therefore, the proposed Project's impact would be less than significant and not cumulatively considerable. No successive projects of the same or similar use within the vicinity of the proposed Project are known or expected to occur over time that would result in cumulatively considerable impacts. Furthermore, as discussed throughout this document, the proposed Project would not result in significant environmental impacts that would be capable of combining with impacts from other cumulative projects to result in a cumulative impact. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the Project.

c. Criterion 15300.2(c): Significant Effects: A Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no known unusual circumstances that are applicable to the proposed Project, and which may result in a significant effect on the environment. The proposed Project consists of the development of 15 single-family residential lots within an urban developed area that is served by utilities and transportation. The Project site would be consistent with the City's General Plan and the Municipal Code; thus, the provision of single-family residential buildings would not introduce a new

activity to the area that could result in a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the proposed Project.

d. Criterion 15300.2(d): Scenic Highways: A Categorical Exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The Project site is not located within a State Scenic Highway corridor. The nearest Officially Designated State Scenic Highway to the Project site is the section of SR-91 that connects to SR-55 (California Department of Transportation, 2025). The officially designated portion of SR-91 is located approximately two linear miles northeast of the Project site and is not visible from the site. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the proposed Project.

e. Criterion 15300.2(e): Hazardous Waste Sites: A Categorical Exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Government Code Section 65962.5 requires various State and local agencies to compile and update lists of hazardous materials sites that may pose a threat to public health or the environment. These lists, collectively referred to as the “Cortese List”, are maintained by agencies such as the California Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and local enforcement agencies. The Cortese List includes hazardous waste sites, sites with known releases of hazardous substances, and other properties with potential contamination concerns.

A Phase I Environmental Site Assessment (ESA) was prepared for the Project site by Environmental Audit, Inc., in June 2025 (Appendix F). The Phase I ESA included a review of environmental regulatory databases, historical land use records, aerial imagery, and a physical site reconnaissance. Specifically, the Phase I ESA included a comprehensive records search of federal, State, County, City, and tribal environmental databases, performed using Environmental Data Resources (EDR) to identify any potential hazardous materials concerns associated with the Project site and Project vicinity.

The Phase I ESA confirmed that the Project site is not listed on the Cortese List or any other federal or State databases identifying hazardous materials sites. Additionally, although several nearby properties were identified in environmental records, none were determined to pose a Recognized Environmental Condition, Controlled Recognized Environmental Condition, or Historical Recognized Environmental Condition for the Project site.

Therefore, based on the results of the Phase I ESA and the absence of hazardous material concerns or listing on the Cortese List, the Project site is not subject to the exception under CEQA Guidelines Section 15300.2(e). The exception under CEQA Guidelines Section 15300.2(e) does not apply to the proposed Project.

f. Criterion 15300.2(f): Historical Resources: A Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resources.

According to the State CEQA Guidelines, a historical resource is defined as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the Project's Lead Agency.

As previously mentioned, the Project site is vacant and undeveloped, with no existing active land uses. There are no existing buildings or structures on site. Therefore, the Project site is ineligible for listing in the National Register of Historic Places and California Register of Historical Resources. As such, the Project site does not contain a historical resource, nor would it result in impacts to historical resources. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the proposed Project.

4.3. Conclusion

On the basis of the evidence provided above, the proposed Project is eligible for a Class 32 Categorical Exemption in accordance with Section 15332, *Infill Development Projects*, of the CEQA Guidelines. Because the proposed Project meets the criteria for categorically exempt infill development projects listed in CEQA Guidelines Section 15332 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the proposed Project.

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