

# CATEGORICAL EXEMPTION FINDINGS

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## NEW WELL AT SERRANO WATER DISTRICT HEADQUARTERS PROPERTY

*City of Villa Park and Orange County, California*

**Prepared for:**

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# 1.0 INTRODUCTION

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The Serrano Water District (SWD) proposes to construct one (1) new groundwater well and install associated infrastructure to connect to the existing SWD system, as well as permanently abandon and demolish two (2) aging existing wells within the City of Villa Park (City) and Orange County (County) for the purposes of maintaining a reliable and resilient groundwater system (proposed Project).

The California Environmental Quality Act (CEQA) requires the review of projects that involve the exercise of discretionary powers by a public agency and that could result in a physical change in the environment. Section 15061 of the CEQA guidelines provides that once a lead agency has determined that a project is subject to CEQA, it shall next determine if that project may be exempt from CEQA. The Serrano Water District (SWD) is the public agency with principal responsibility for approving the proposed Project and will serve as the Lead Agency accordingly.

Public Resources Code Section 21084 provides that the CEQA Guidelines shall include a list of classes of projects that have been determined not to have a significant effect on the environment and that shall be exempt from CEQA. Article 19 of the CEQA Guidelines (Sections 15300 to 15333) sets forth the list of exemption classes.

The proposed Project qualifies for an exemption under Section 15300 of the State CEQA Guidelines<sup>1</sup> as a Class 2 Replacement or Reconstruction Exemption (Section 15302).<sup>2</sup> The proposed new well would replace the two existing wells proposed to be demolished, in order to support the District's goal of maintaining a reliable and resilient groundwater system. The proposed Project would not result in any increase in overall groundwater production capacity or expansion of the SWD's water supply system as discussed in further detail in subsequent sections of this Categorical Exemption Findings.

Section 15302 defines the Class 2 Replacement or Reconstruction Exemption, as the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

A project that meets these criteria for an exemption may still be subject to CEQA if one of the following exceptions identified in CEQA Guidelines Section 15300.2 apply:

- a) **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - these classes are considered to not apply where the project may have an impact on

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1 State of California. *California Public Resources Code*, Section 15300. *California Environmental Quality Act (CEQA) Guidelines*.

2 State of California. *California Code of Regulations*, Title 14, Section 15302. *California Environmental Quality Act Guidelines*.

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 Effect.** 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.
- 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.

## 2.0 PROJECT DESCRIPTION

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### 2.1 Background

The Serrano Water District (SWD or District), established in 1876 under the California Water Code, is an independent special district governed by a five-member board of directors. The District provides potable water service to the City of Villa Park and a portion of the City of Orange, serving approximately 6,500 residents within a 4.7-square-mile service area. The District's service area is largely built out, consisting primarily of single-family residential neighborhoods and one commercial shopping center.

SWD's water supply is derived from local groundwater and surface water stored in Irvine Lake. Groundwater is pumped from two active production wells, Wells 3 and 5, located within the City of Villa Park and conveyed to the District's per- and polyfluoroalkyl substances (PFAS) Water Treatment Plant at the SWD headquarters property for treatment before distribution. An inactive well (Well 4) is located at a nearby SWD site at the intersection of Villa Park Road and Lemon Street in Orange County. The District supplies approximately 2,900 acre-feet of water annually and maintains a system that includes 43 miles of pipeline and two water storage reservoirs. To ensure reliability, SWD also maintains interconnections that allow the purchase of supplemental water from the Metropolitan Water District of Southern California and the Irvine Ranch Water District.

### 2.2 Project Characteristics

As shown in **Figure 1: Regional Location Map**, the Project Site is located in Orange County on two sites in close proximity to each other in the southern portion of the City of Villa Park and Orange County, approximately 0.05 miles south of Orange County Route S18 (S18) and 0.75 miles east of State Route 55 (SR-55). As shown in **Figure 2: Project Site Location Map**, the Project Site encompasses both the SWD headquarters property located at 18021 Lincoln Street (herein referred to as the "SWD headquarters property") and the nearby Well 4 site located at the intersection of Villa Park Road and Lemon Street in the vicinity of 18652 Villa Park Road (herein referred to as the "Well 4 site") in unincorporated Orange County. As shown in **Figure 3: Project Site Existing Conditions**, the SWD headquarters property contains a PFAS Water Treatment Plant, administrative facilities, and two active groundwater wells, Well 3 and Well 5. The Well 4 site contains an inactive well that has been taken out of service. Together, these two properties comprise the entirety of the approximately 2-acre Project Site.<sup>3</sup>

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3 The SWD headquarters property is approximately 85,731 square feet (1.97 acres), and the Well 4 site is approximately 2,113 square feet, for a total Project Site size of 87,844 square feet (2.02 acres).

## 2.0—Project Description

The SWD headquarters property has a City of Villa Park land use designation of Estate Low Density Residential (1.75 DU/AC)<sup>4</sup> and is zoned Public Institution.<sup>5</sup> The E-4 Zone is established to provide for the development of medium-low density single-family residential neighborhoods, and the R-1 Zone is established to provide for the development of medium-density single-family residential neighborhoods.<sup>6</sup>

The Well 4 site is located within unincorporated Orange County, specifically the Santiago Creek unincorporated island, which has an Orange County land use designation of Open Space<sup>7</sup> and is zoned SG (Sand and Gravel Extraction).<sup>8</sup> The Open Space land use designation provides for limited land uses that do not require a commitment of significant urban infrastructure, including land containing non-renewable and renewable resource areas, prime agricultural soils, and water resource areas.<sup>9</sup> However, the California Government Code exempts the development of water and wastewater infrastructure projects initiated by water agencies from County and City building and zoning ordinances.<sup>10</sup>

As shown in **Figure 4: Proposed Site Plan**, the District proposes to construct a replacement groundwater production well, Well 6, at the SWD headquarters property. Well 6 would replace the existing Well 3, which, along with the existing Well 4, would be permanently abandoned and demolished as part of the Project. The existing Well 5 would remain in service.

Well 6 would have a capacity of approximately 3,000 gallons per minute (gpm) and would be drilled using the reverse circulation rotary method to a depth of approximately 730 feet with a 20-inch stainless steel casing. Construction of Well 6 would supplement the existing water supply, provide redundancy in the event another active well becomes temporarily or permanently inoperable, and support the District's goal of maintaining a reliable and resilient groundwater system.

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<sup>4</sup> City of Villa Park General Plan. Land Use Element. Exhibit II-1: Land Use Policy Map. Accessed November 2025. [https://villapark.org/Portals/0/Documents/Departments/Planning/General Plan/Land Use Element/II. Land Use Element.pdf?ver=TRoHLhoqGv2DYx4icCPMqg%3d%3d](https://villapark.org/Portals/0/Documents/Departments/Planning/General%20Plan/Land%20Use%20Element/II.%20Land%20Use%20Element.pdf?ver=TRoHLhoqGv2DYx4icCPMqg%3d%3d)

<sup>5</sup> City of Villa Park Zoning Map. Accessed November 2025. [https://villapark.org/Portals/0/Documents/Departments/Planning/Maps/Zoning Map .pdf?ver=xJ55MSJ-9MloQp3ll9bGVA%3d%3d](https://villapark.org/Portals/0/Documents/Departments/Planning/Maps/Zoning%20Map.pdf?ver=xJ55MSJ-9MloQp3ll9bGVA%3d%3d)

<sup>6</sup> City of Villa Park, CA. Code of Ordinances. Chapter XXIII: Zoning. Accessed November 2025. [https://library.municode.com/ca/villa\\_park/codes/code\\_of\\_ordinances?nodeId=CHXXIII\\_ZO\\_ART23-6SIMIREESSIMIREZORE\\_S23-6.1PUIN](https://library.municode.com/ca/villa_park/codes/code_of_ordinances?nodeId=CHXXIII_ZO_ART23-6SIMIREESSIMIREZORE_S23-6.1PUIN)

<sup>7</sup> Orange County General Plan. Land Use Designations. Accessed November 2025. <https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/58442.pdf>

<sup>8</sup> Orange County Public Works. Unincorporated County of Orange, California. Zoning Districts. Accessed November 2025. <https://ocds.ocpublicworks.com/sites/ocpwocds/files/import/data/files/52866.pdf>

<sup>9</sup> Orange County General Plan. Land Use Element. Accessed November 2025. <https://ocds.ocpublicworks.com/sites/ocpwocds/files/2024-07/Adopted%20Land%20Use%20Element%20Amendment%20-%20June%202024.pdf>

<sup>10</sup> California Government Code. Section 53091(d) and (e).

## ***2.0—Project Description***

The existing PFAS Water Treatment Plant at the SWD headquarters property has a maximum treatment capacity of approximately 3,000 gallons per minute (gpm). Under existing conditions, the SWD well system can produce up to 3,000 gpm when Wells 3 and 5 are operating. As part of the proposed Project, Well 3 would be abandoned and replaced by the new Well 6, while Well 5 would remain in service. After implementation, only one well would operate at a given time, either Well 5 or the new Well 6, because simultaneous operation of both wells would exceed the 3,000-gpm capacity of the existing PFAS Water Treatment Plant. As a result, the District's maximum production capacity and system throughput would remain limited to 3,000 gpm, and the proposed Project would not increase the District's overall water production capacity.

A new masonry block building would be constructed to house Well 6 and its associated mechanical and controls equipment, including a vertical turbine pump with a 600-horsepower motor. The building would be equipped with acoustic panels for noise attenuation and would be designed to be visually compatible with the surrounding residential neighborhood. Additional exterior components of the proposed Project would include a 4160-volt variable-frequency drive, new electrical switchgear and transformer equipment, and a 1,500-kilowatt standby diesel generator.

The proposed Project would also include approximately 800 feet of new underground 16-inch piping within the SWD headquarters property connecting Well 6 to the PFAS Water Treatment Plant influent and directing waste to existing drain piping. New electrical conduits and control connections would be installed and integrated into the existing Supervisory Control and Data Acquisition (SCADA) system.

As part of the proposed Project, Well 3, located at the headquarters property, and Well 4, located on the Well 4 site at the intersection of Villa Park Road and Lemon Street, would both be permanently abandoned and demolished. Demolition activities would include the removal and capping of the existing wells, which would be backfilled, regraded, and restored with ground cover. As Well 3 is currently in service, demolition of Well 3 would occur after equipping and testing of Well 6 to maintain uninterrupted water supply during construction.

Construction equipment would be staged on the SWD headquarters property, likely in the northwest corner of the property. Construction contractors would be expected to follow a haul route exiting SR-55 east at S18, and either continuing east on S18 to access the Well 4 site or turning south on North Wanda Road, then east on Lincoln Street to access the SWD headquarters property.

### ***Construction Schedule***

Construction of the proposed Project would occur in two phases, the Well Drilling Phase and the Well Equipping Phase, with construction anticipated to occur between April 2026 and July 2027.

The Well Drilling Phase is anticipated to begin in April 2026 and continue through early September 2026, lasting approximately 14 weeks. Activities during this phase would include mobilization of

## 2.0—Project Description

equipment and materials, placement of sound walls, well drilling, well casing installation, well development, pump testing, and removal of sound walls upon completion.

Select construction activities during the Well Drilling Phase would occur on a 24-hour schedule, such as drilling, development, and pump testing, which must be performed continuously for technical reasons. These activities require uninterrupted operation to maintain the stability of the borehole, prevent collapse of the well casing, and ensure accurate measurement of groundwater characteristics during testing. The most conservative estimate includes up to five separate 5-day periods of continuous 24-hour operation. Temporary sound walls measuring approximately 25 feet in height would be installed along the property boundaries prior to initiation of drilling activities and would remain in place throughout any 24-hour construction periods. These sound walls would be placed immediately adjacent to property lines to provide maximum noise attenuation for nearby receptors.

The Well Equipping Phase would begin following completion of well drilling and testing, and would occur from September 2026 through July 2027, lasting approximately 44 weeks. Activities during this phase would include mechanical, structural, and electrical installations, building construction around Well 6, and the demolition of Wells 3 and 4. The demolition of Wells 3 and 4 would occur over a period of approximately three weeks (anticipated between August and early September 2026). All Well Equipping Phase activities would occur during normal daytime working hours, with no continuous 24-hour operations anticipated.

**TABLE 1: CONSTRUCTION SCHEDULE**

Construction Phase	Start Date	End Date
Well Drilling	April 2026	September 2026
Well Equipping	September 2026	July 2027

### 2.3 Surrounding Land Use and Zoning Designations

The area surrounding the SWD headquarters property is comprised of single-family residential neighborhoods. Villa Park Elementary School is located to the southeast of the SWD headquarters property, about 150 feet apart at the nearest point.

As shown in **Figure 5: City of Villa Park Land Use Map** and **Figure 6: City of Villa Park Zoning Map**, properties adjacent to the west of the SWD headquarters property have a general plan land use designation of Low Density Residential (2.5 DU/AC) and are zoned R-1 (8,000-13,500); properties adjacent to the south, across Lincoln Street, have a general plan land use designation of Low Medium Density Residential (3.0 DU/AC) and are zoned R-1 (8,000-13,500); properties adjacent to the north have a general plan land use designation of Estate Low Density Residential (1.75 DU/AC) and are zoned E-4-17 and E-4-18; properties adjacent to the east have a general plan land use designation of Estate Low Density Residential (1.75 DU/AC) and are zoned E-4 Small Estate Residential.

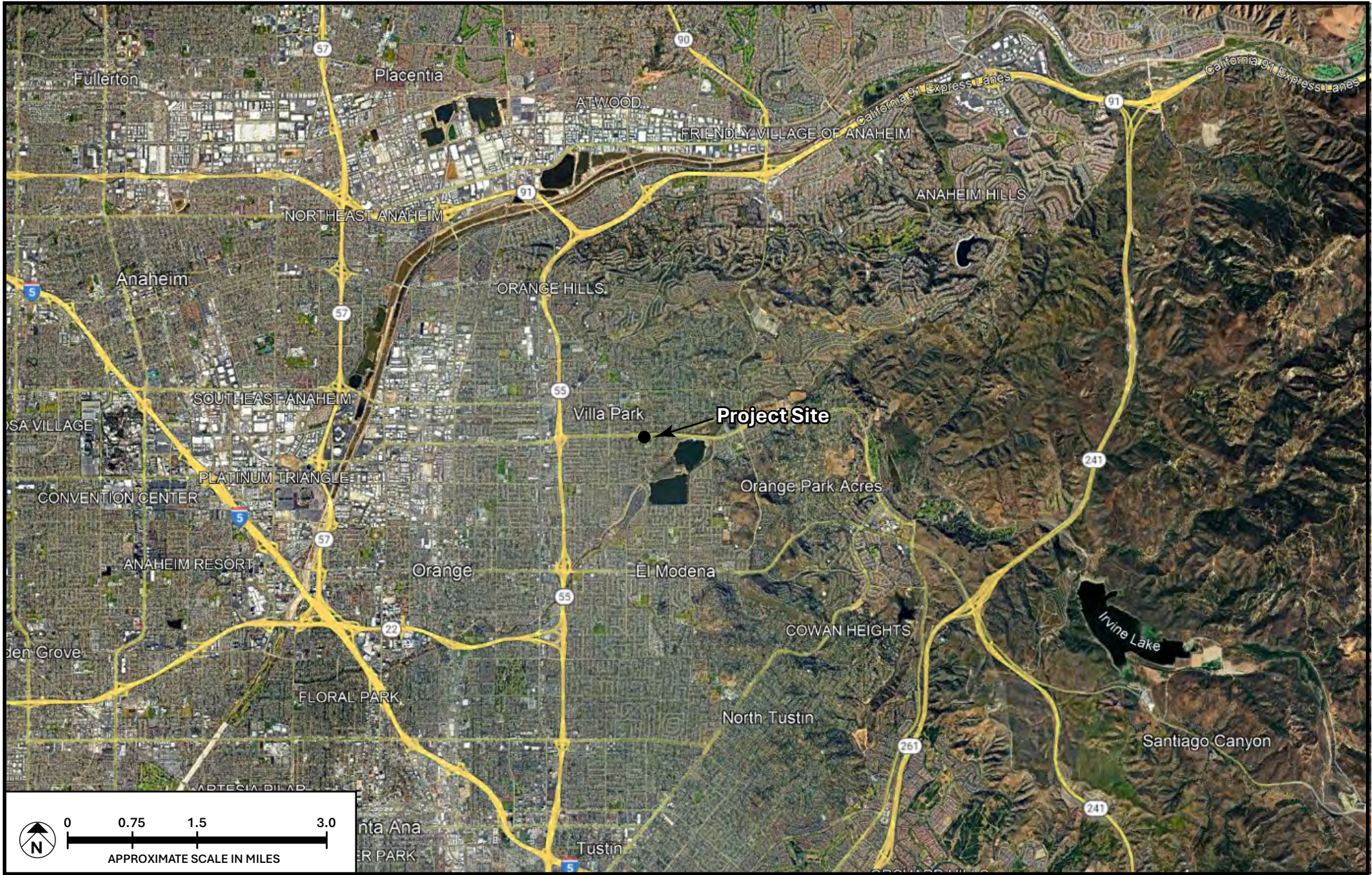
## 2.0—Project Description

The area surrounding the Well 4 site is comprised of single-family residential neighborhoods to the north and west, located in the City of Villa Park, and open space to the south and east, located in unincorporated Orange County. The Santiago Creek Recharge Basin is located to the southeast of the Well 4 site, about 400 feet apart at the nearest point.

As shown in **Figure 5: City of Villa Park Land Use Map** and **Figure 6: City of Villa Park Zoning Map**, properties adjacent to the north and west of the Well 4 site have a general plan land use designation of Estate Low Density Residential (1.75 DU/AC) and are zoned E-4 Small Estate Residential. As shown in **Figure 7: Orange County Land Use Map** and **Figure 8: Unincorporated Orange County Zoning Map**, properties adjacent to the south and east of the Well 4 site have a general plan land use designation of Open Space and are zoned SG (Sand and Gravel Extraction).

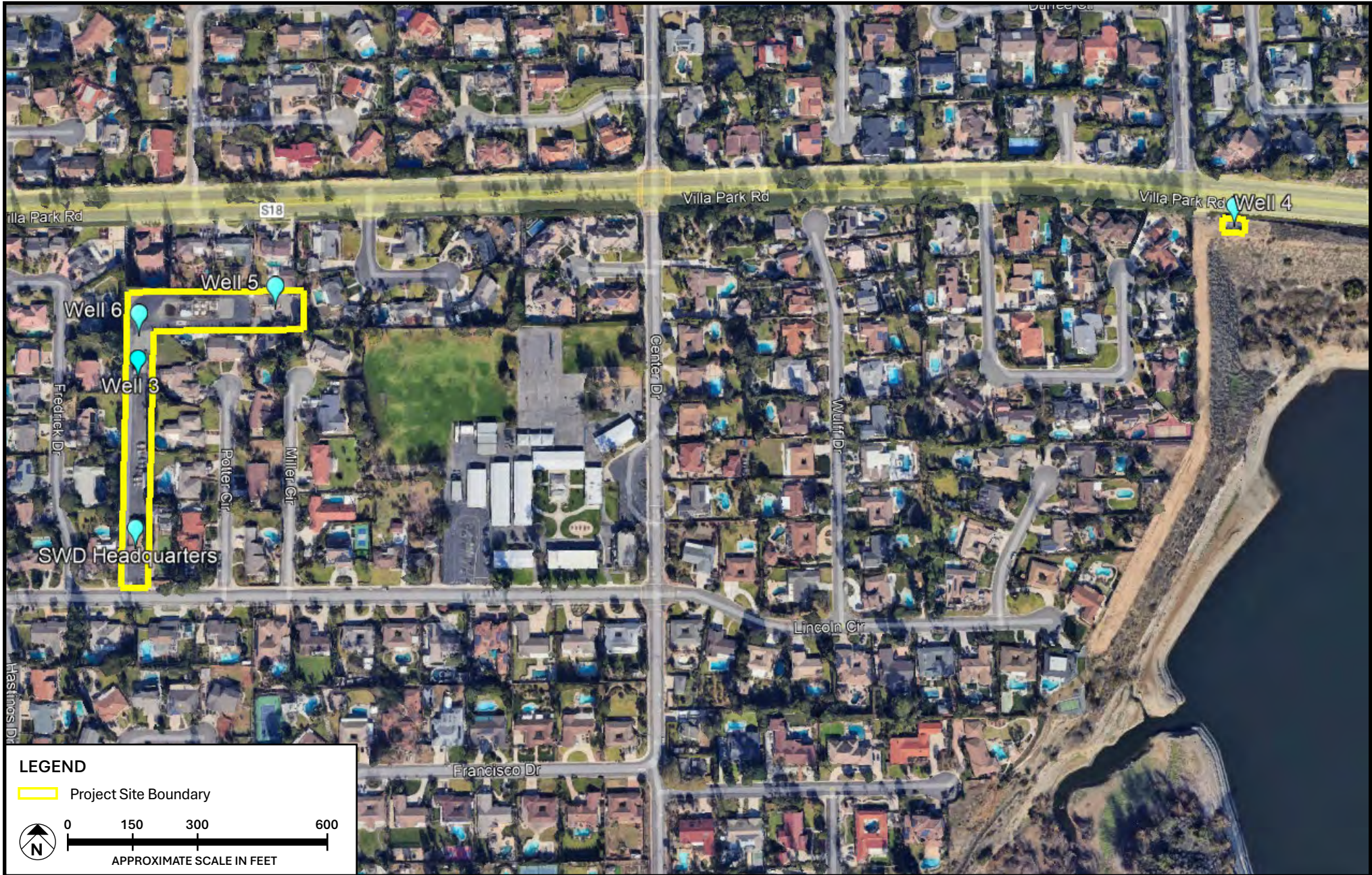
### 2.4 Approval Actions

No discretionary permits would be required for the proposed Project to be implemented. Implementation of the proposed Project would require issuance of a Well Operating Permit by the Division of Drinking Water (DDW), and new well construction permits for Well 6 and abandonment permits for Wells 3 and 4 by the Orange County Health Care Agency (OCHCA). Approval of a Drinking Water Source Assessment and Protection (DWSAP) Report would be required by the State Water Resources Control Board and the DDW. The Santa Ana Regional Water Quality Control Board (RWQCB) has issued a National Pollutant Discharge Elimination System (NPDES) permit for discharge of well development water, and the South Coast Air Quality Management District (SCAQMD) would issue an operating permit for the standby generator.



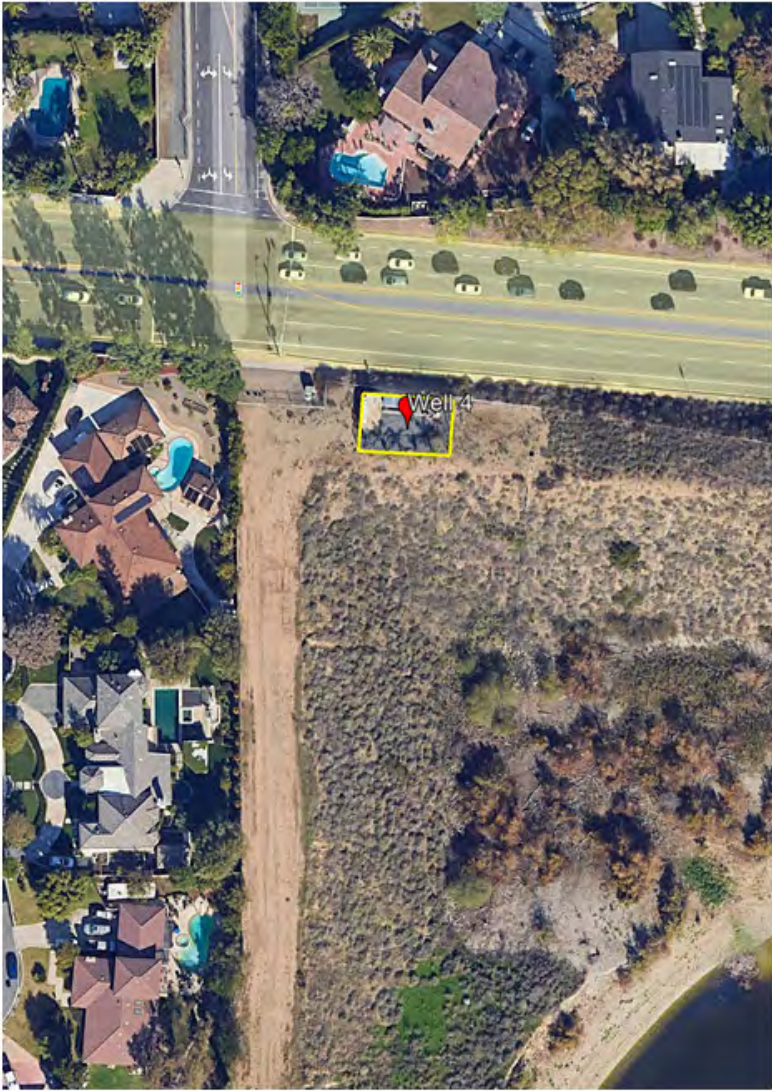
SOURCE: Google Earth – 2025.

FIGURE 1




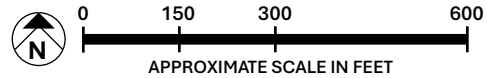
SOURCE: Google Earth – 2025.

FIGURE 2



**LEGEND**

 Project Site Boundary



SWD Headquarters Property

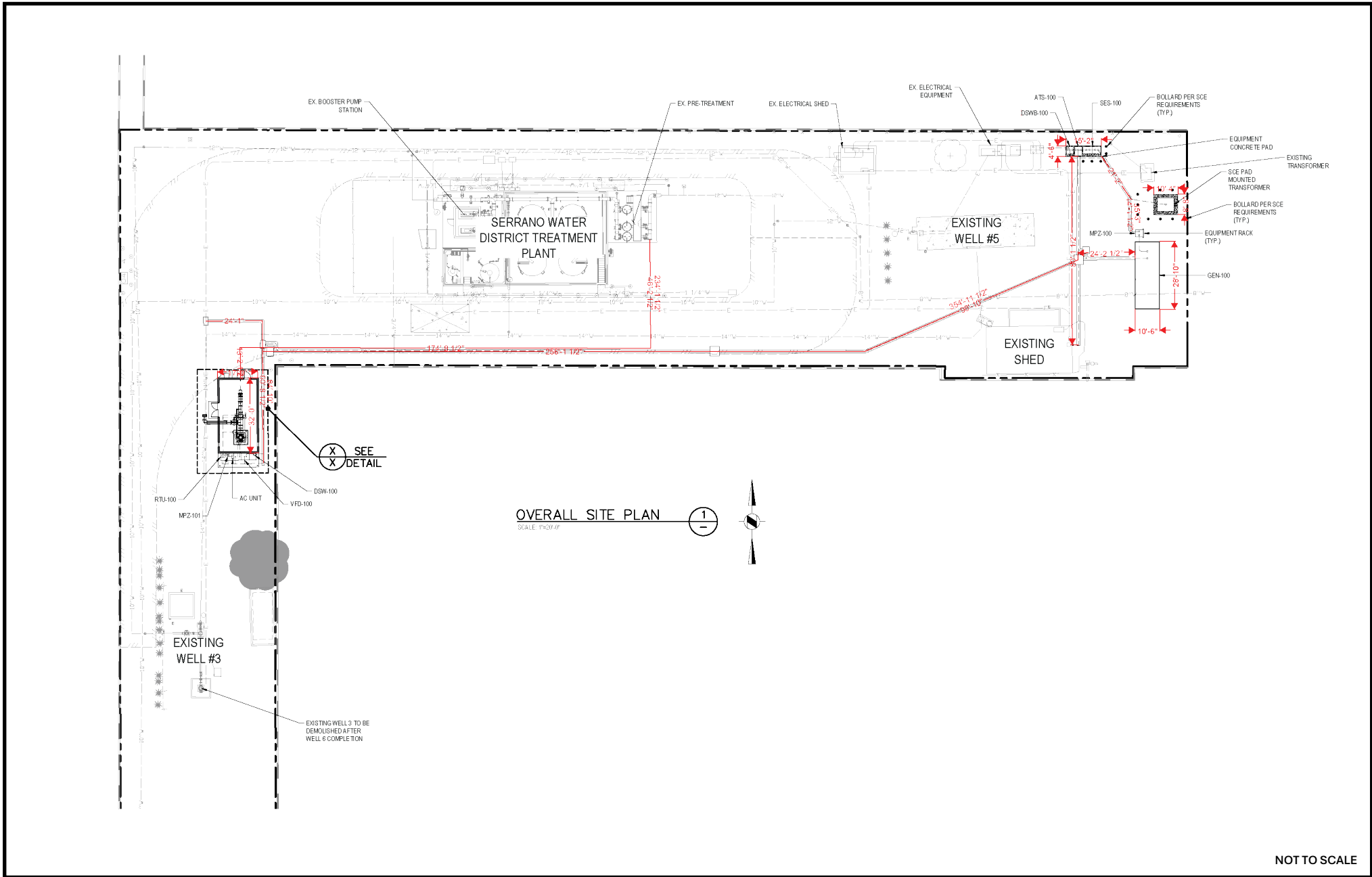
Well 4 Site

SOURCE: Google Earth – 2025.

FIGURE 3



Project Site Existing Conditions

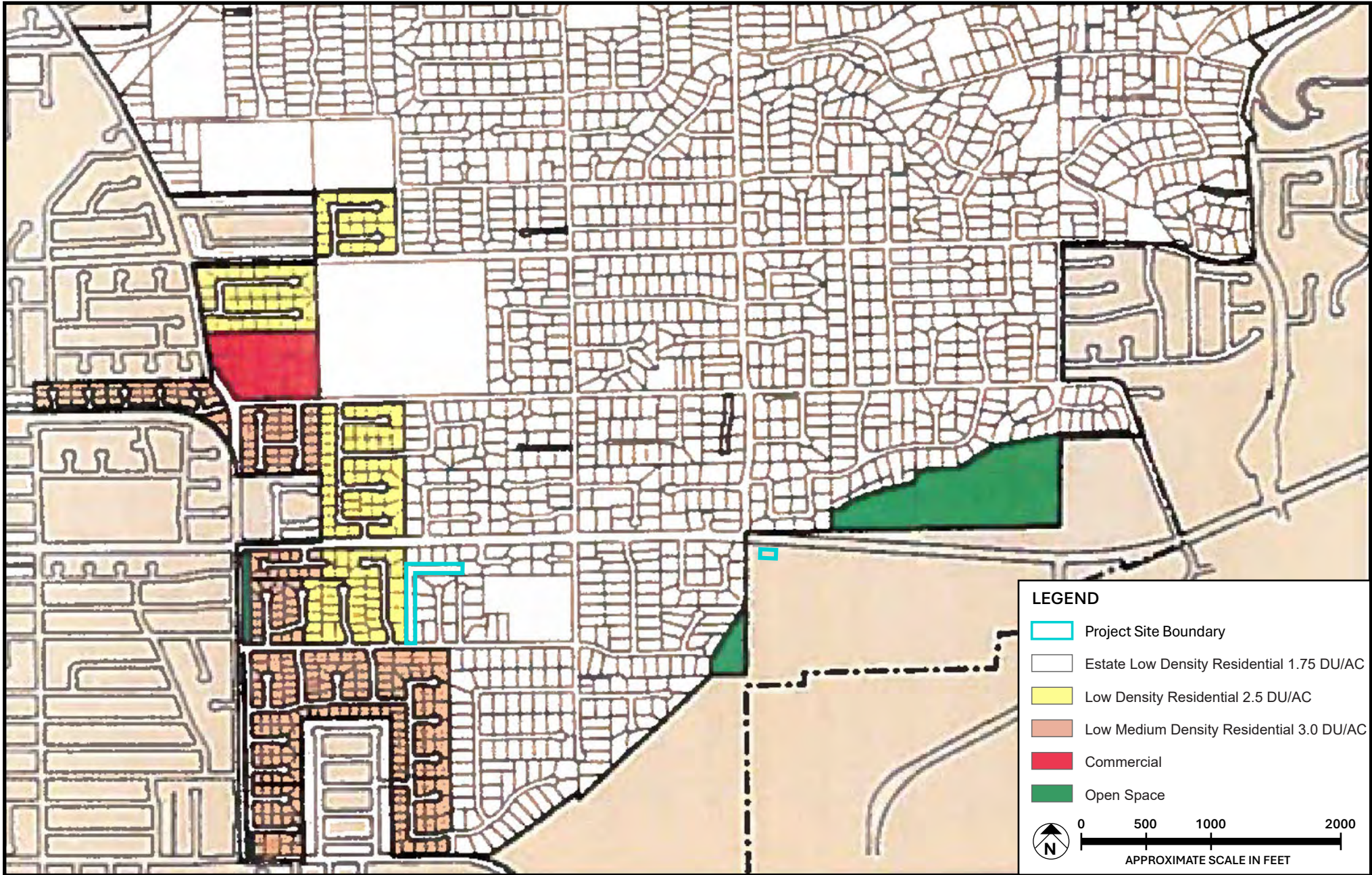


SOURCE: Civiltec Engineering, Inc. - 2025.

FIGURE 4

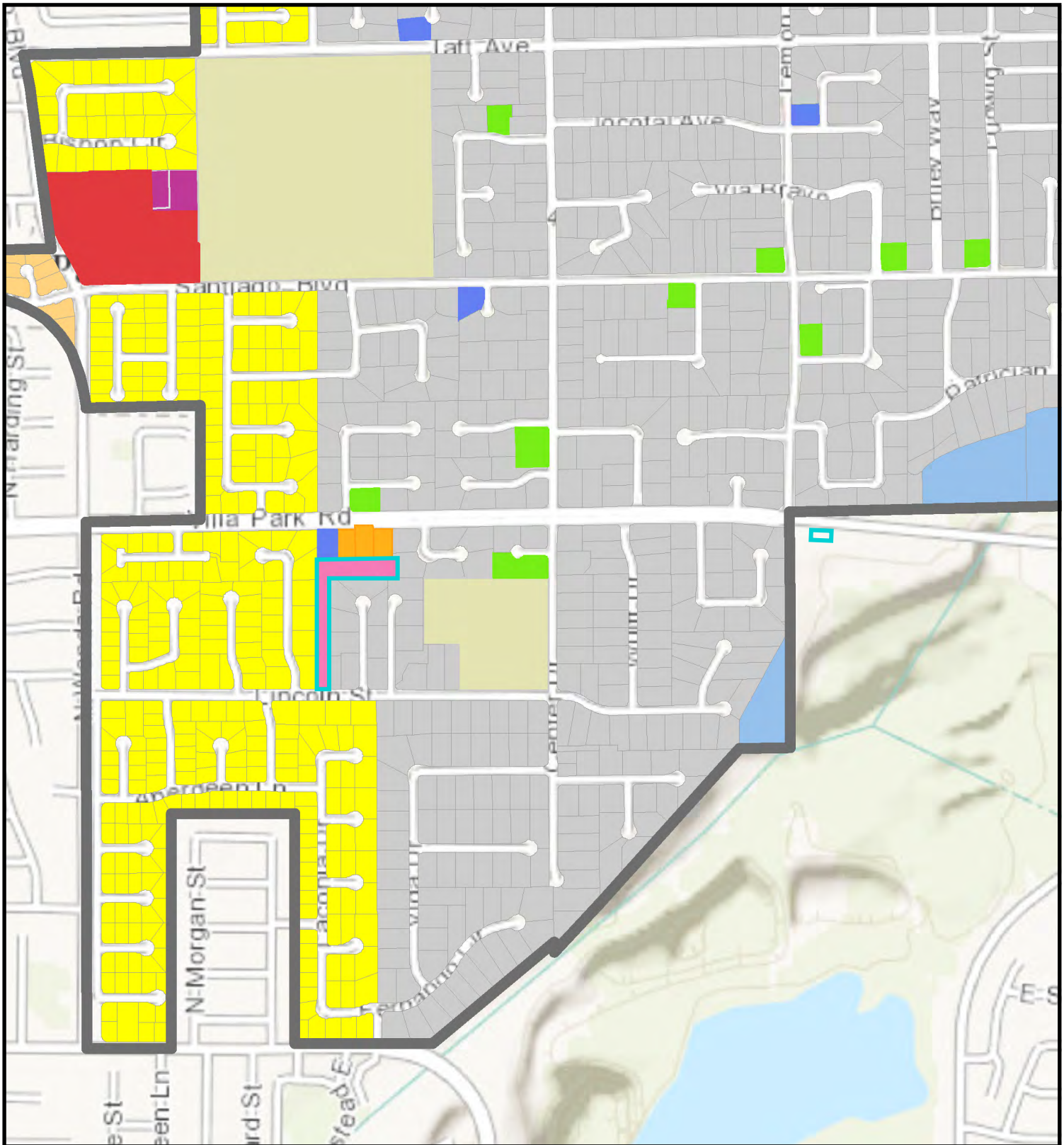


Proposed Site Plan



SOURCE: City of Villa Park General Plan, Land Use Element. October 2019.

FIGURE 5



**Legend:**

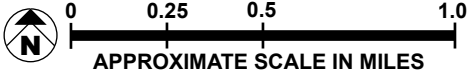
Project Site Boundary

**Zoning:**

- R-1 (8,000-13,500)
- E-4-17
- E-4-18
- E-4-19

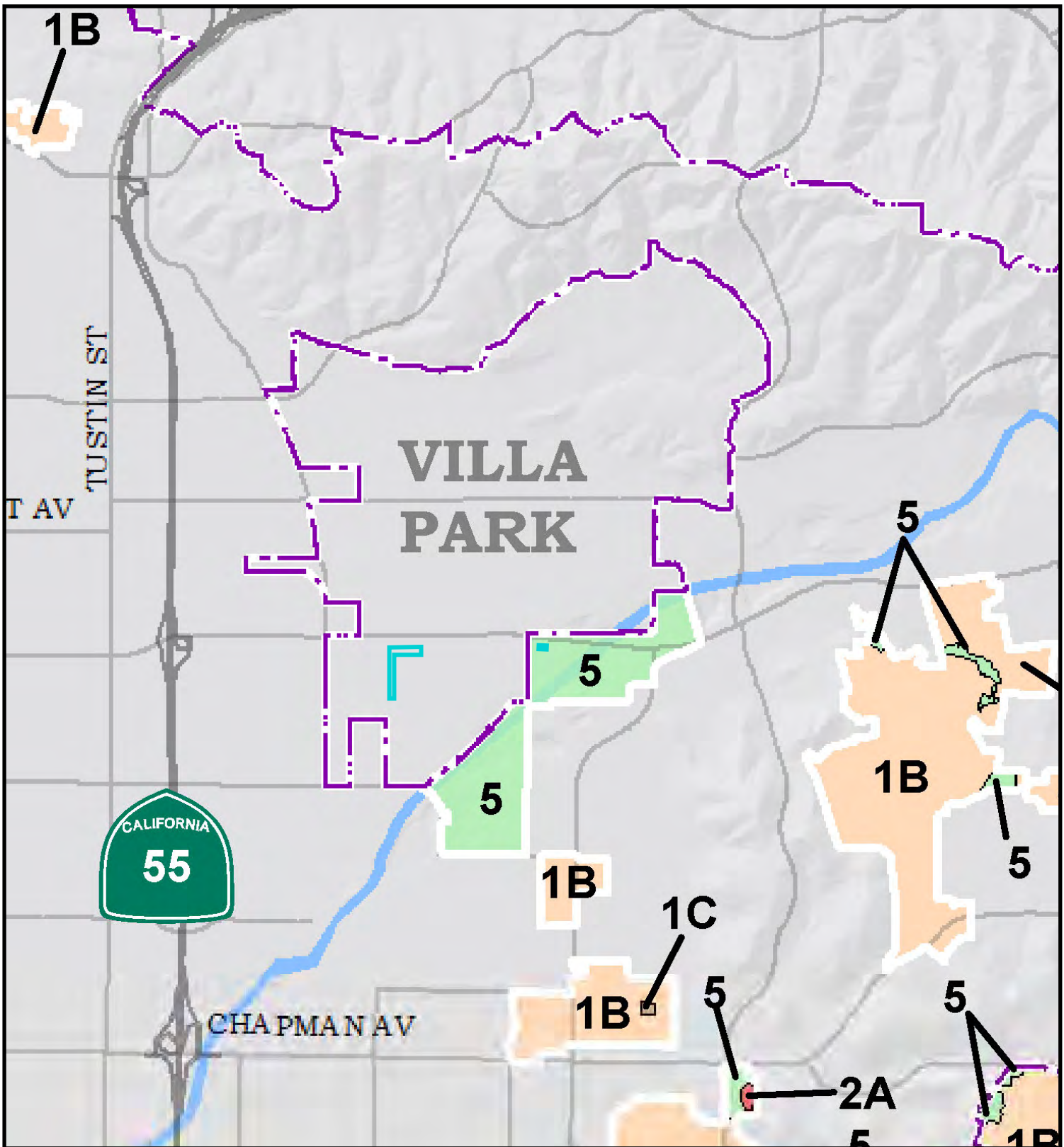
- E-4 Small Estate Residential
- PC-Martinique
- PC-Orchards
- Commercial Professional

- Neighborhood Commercial
- School
- Public Institution
- Orange County Flood Control District



SOURCE: SCAG - 2015.

FIGURE 6



**Legend:**

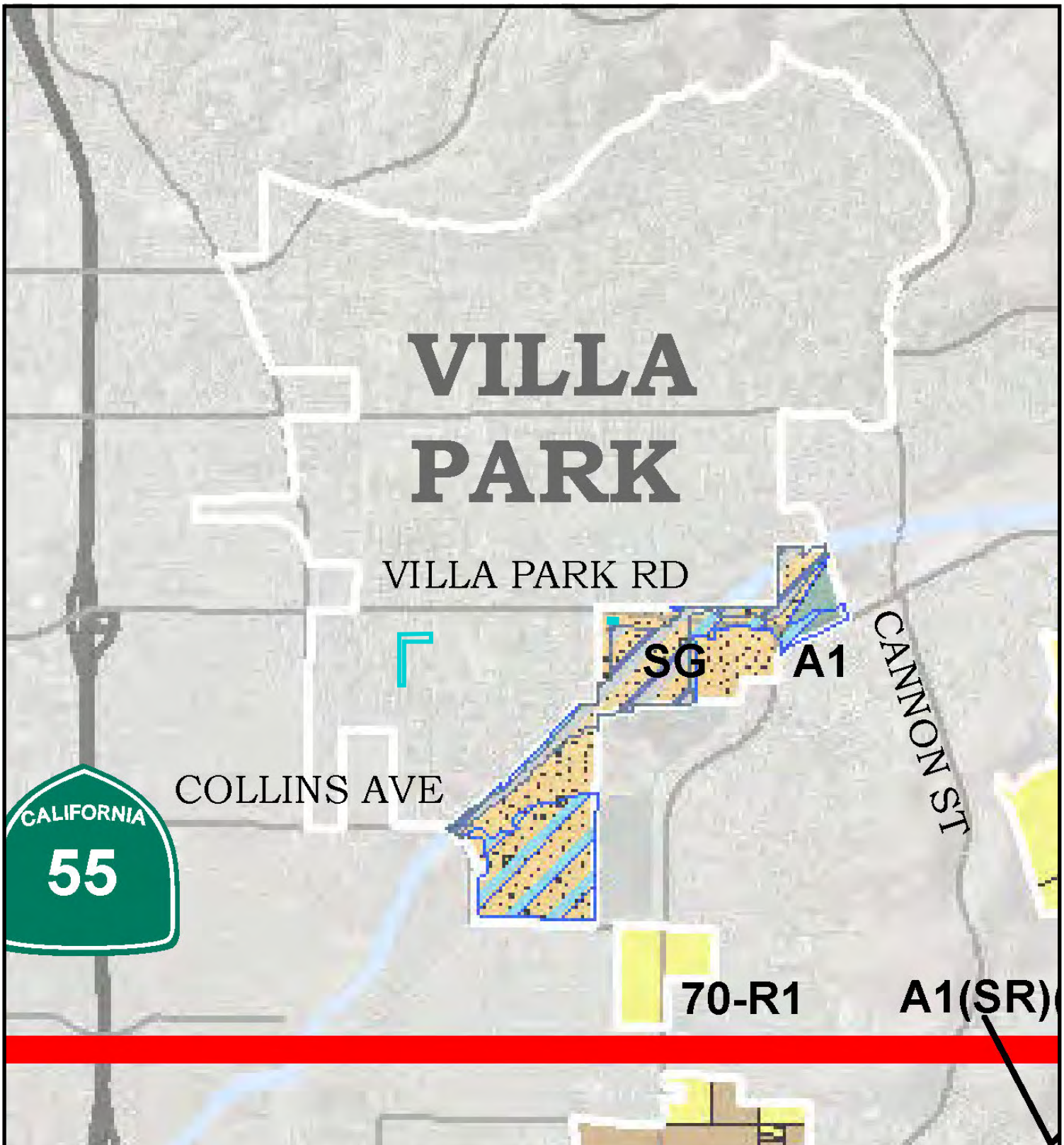
- Project Site Boundary
- City/County Jurisdiction
- Sphere of Influence Boundary

**Zoning:**

- |                          |                         |                           |
|--------------------------|-------------------------|---------------------------|
| 1A Rural Residential     | O2B Regional Commercial | 5 Open Space              |
| 1B Suburban Residential  | 3 Employment            | 5 Open Space Reserve      |
| 1C Urban Residential     | 4 Public Facilities     | Cleveland National Forest |
| O2A Community Commercial | 4(LS) Landfill Site     | 6 Urban Activity Center   |

SOURCE: Orange County General Plan, Land Use Element - August 23, 2015.

FIGURE 7



<b>Legend:</b>		<b>Zoning:</b>		Flood Plain Zone 1
	Project Site Boundary		Residential	Flood Plain Zone 2
			Multi-Family Dwellings	Sand & Gravel Extraction
			Open Space	Incorporated
			General Agricultural	

SOURCE: Orange County Public Works - 2016.

FIGURE 8

## 3.0 ENVIRONMENTAL REVIEW UNDER CEQA

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Pursuant to the State CEQA Guidelines for Statutory Exemptions (Sections 15260 to 15285 of the CEQA Guidelines) and Categorical Exemptions (Sections 15300 to 15332 of the CEQA Guidelines), the proposed Project is exempt from CEQA based on the inclusion of the proposed Project under Section 15302, Class 2: Replacement or Reconstruction Exemption Criteria.

### 3.1 15302 Class 2: Replacement or Reconstruction

The Class 2 Replacement or Reconstruction Exemption, as defined in Section 15302, consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Examples include replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.

Implementation of the proposed Project would include construction of one new groundwater production well, identified as Well 6, and demolition of two aging existing wells, Wells 3 and 4, located within the Project Site. These improvements are intended to maintain a reliable and resilient groundwater supply system by replacing outdated infrastructure with modern, functionally equivalent facilities. As previously discussed, the proposed Project would not result in any increase in overall groundwater production capacity or expansion of the SWD's water supply system.

The new Well 6 would replace the existing Well 3 located at the SWD headquarters property. Well 6 would serve the same purpose as Well 3 by providing groundwater to the existing PFAS Water Treatment Plant for treatment and distribution to customers within the District's service area. The new well would be situated within the same operational facility as the well it replaces and would not expand the District's service area, capacity, or production rate beyond existing conditions.

The proposed Project also includes the permanent abandonment and demolition of Well 4. Well 4 is currently inactive and no longer serves a role in the District's groundwater supply system. Its removal is part of the District's ongoing infrastructure renewal program to replace or eliminate obsolete facilities.

## 4.0 EXCEPTIONS TO CATEGORICAL EXEMPTIONS

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Section 15300.2 of the CEQA Guidelines identifies the following exceptions to the applicability of these exemptions. The proposed Project does not meet any of the conditions listed that would prohibit it from the use of the listed exemptions.

a) **Location.**

*CEQA Guidelines Section 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 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.*

This exception applies only to exemption Classes 3, 4, 5, 6, and 11, and does not apply to exemption Class 2. Because the proposed Project meets the criteria for the Class 2 Replacement or Reconstruction Exemption, as defined in Section 15302, this exception does not apply.

b) **Cumulative Impact.**

*CEQA Guidelines Section 15300.2(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.*

A categorical exemption is inapplicable “when the cumulative impact of successive projects of the same type in the same place, over time is significant.” Implementation of the proposed Project would include the construction of a new groundwater production well, Well 6, and the installation of associated infrastructure, including a new masonry building to house Well 6 and its mechanical and electrical equipment, as well as approximately 800 feet of new underground 16-inch piping within the SWD headquarters property to connect Well 6 to the existing SWD system. The new Well 6 would replace the aging existing Wells 3 and 4, which would be permanently abandoned and demolished as part of the proposed Project. The existing Well 5 would remain in service. As discussed above, the proposed Project would not result in any increase in overall groundwater production capacity or expansion of the SWD’s water supply system as the existing PFAS Water Treatment Plant at the SWD headquarters property has a maximum treatment capacity of approximately 3,000 gallons per minute (gpm). After implementation of the proposed Project, only one well would operate at a given time, either Well 5 or the new Well 6, because simultaneous operation of both wells would exceed the 3,000-gpm capacity of the existing PFAS Water Treatment Plant. Therefore, the maximum production capacity of the system would remain at 3,000 gpm.

Construction of Well 6 and demolition of Wells 3 and 4 would not require alterations to any undisturbed land. No road closures are proposed to accommodate construction of the proposed Project, and no disruption of emergency access or traffic circulation around the Project Site would

#### 4.0—Exceptions to Categorical Exemptions

occur. Upon completion of the proposed Project, the Project Site would operate the same as existing conditions.

Impacts associated with the construction of Well 6 and demolition of Wells 3 and 4 would be temporary in nature, and the proposed Project would not generate an operational increase in population, transportation, noise, or air pollutant emissions nor would it result in any other substantial impacts compared to existing conditions in the vicinity of the Project Site. For these reasons, this exception does not apply.

c) **Unusual Circumstances.**

*CEQA Guidelines Section 15300.2(c) Significant Effect. 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.*

A categorical exemption is inapplicable when there is a reasonable possibility that the activity would have a significant effect on the environment due to unusual circumstances. Unusual circumstances could occur if the Project Site featured conditions or a location substantially different than typically associated with the existing or proposed uses. The proposed Project would not alter the existing use or character of the Project Site as the Project Site currently contains two (2) active groundwater wells at the SWD headquarters property and an inactive well at the Well 4 site. The proposed Project would provide redundancy in the event another active well becomes temporarily or permanently inoperable and support the District's goal of maintaining a reliable and resilient groundwater system.

As previously discussed, implementation of the proposed Project would include the construction of a new groundwater production well and the installation of associated infrastructure, as well as the demolition of two (2) aging existing wells, which would not result in any increase in overall groundwater production capacity or expansion of the SWD's water supply system. All construction would occur within previously developed areas of the Project Site, and no off-site construction is anticipated. Upon completion of the proposed Project, the Project Site would operate the same as existing conditions.

The Project Site is not unusual in terms of size or other physical characteristics. There are no known unusual circumstances associated with the proposed Project or the Project Site. Moreover, there is no evidence that the Project would have a significant effect on the environment. Therefore, this exception does not apply.

d) **Scenic Highways.**

*CEQA Guidelines Section 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.*

#### 4.0—Exceptions to Categorical Exemptions

As previously discussed, the Project Site is located approximately 0.05 miles south of Orange County Route S18 (S18) and 0.75 miles east of State Route 55 (SR-55). According to the California Department of Transportation, these routes are not designated as eligible or official State scenic highways. The nearest State scenic highway is State Route 91, approximately 2.5 miles north of the Project Site.<sup>11</sup> According to the County's Scenic Highway Plan, the County has also designated a portion of State Route 91 as a viewscape corridor.<sup>12</sup> However, as described it is 2.5 miles north of the Project Site and is not within the Project Site's vicinity. The City does not identify any designated scenic routes.<sup>13</sup> The Project Site does not contain any unique ecological, geologic features, or rock outcroppings. Accordingly, this exception does not apply.

e) **Hazardous Waste Sites.**

*CEQA Guidelines Section 15300.2 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.*

A categorical exemption is inapplicable when there is a reasonable possibility that the activity would have a significant effect on the environment. Significant impacts could occur if the Project Site was included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, commonly referred to as the Cortese list. As discussed in the EDR Radius Map Reports prepared for the Project Site (**Appendix A**), the Cortese list was searched for listings of hazardous materials on the Project Site and within a 0.5-mile radius. The Project Site, which consists of the SWD headquarters property and the Well 4 site, is not included on a list of hazardous materials sites, compiled pursuant to Government Code Section 65962.5. Although the SWD headquarters property appears on other regulatory databases, including the Hazardous Waste Tracking System, Hazardous Waste Manifest, and Enforcement and Compliance History Online, these databases are not part of the Cortese list compilation and reflect only routine hazardous materials handling associated with water treatment operations. These listings do not indicate contamination or any corrective action status. The Well 4 site was not identified in any hazardous materials or contamination databases. The nearest hazardous materials sites include two (2) closed leaking underground storage tank (LUST) cases located approximately 0.4 miles northwest of the Project Site that have been fully remediated.

The proposed Project would not involve the routine use, handling, or transport of hazardous materials that would create a substantial risk to the public. As mentioned in the analysis above, there are no

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11 California Department of Transportation. "California Scenic Highway Mapping System." Map. Accessed November 2025.  
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

12 County of Orange. *Scenic Highway Plan*. Accessed November 2025.  
<https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/8588.pdf>.

13 City of Villa Park. *General Plan: Circulation Element*. Accessed November 2025.  
<https://villapark.org/Portals/0/Documents/Departments/Planning/General Plan/Circulation Element/III.Circulation.pdf?ver=SeS8ZAYPuu6mBDm4nrU4Vw%3d%3d>.

#### 4.0—Exceptions to Categorical Exemptions

known or identified potentially significant effects on the environment. The Project Site contains no hazardous environmental conditions. Accordingly, this exception does not apply.

f) **Historical Resources.**

*CEQA Guidelines Section 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 resource.*

The proposed Project would not require alterations to any undisturbed land and would not alter the existing use or character of the Project Site. A Cultural Resources Desktop Review (**Appendix B**) was completed for the proposed Project in October 2025, which included a records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). Additionally, a review of historical map records, aerial photographs, United States Geological Survey (USGS) survey plats and General Land Office (GLO) plats were completed. The records search indicated that 23 cultural resource studies have been conducted within one (1) mile of the Project Site since 1976. Out of the 23 previous studies, one (1) study (OR-00801) intersects with the Project Site at the Well 4 site. The records search indicated no fewer than four (4) cultural resources have been previously documented within one (1) mile of the Project Site. Of the four (4) resources, three (3) were historic period buildings and one (1) was a prehistoric resource. There are no documented cultural resources identified within the Project Site. Based on a review of historic topographic maps and aerial images, the Project Site and surrounding areas appear to have undergone continuous disturbance and residential development since 1964.

Based on these findings, no cultural resources are anticipated to be impacted by the proposed Project. If subsurface cultural resources are unearthed on the Project Site during construction activities, the proposed Project would comply with the criteria outlined by the California Register of Historical Resources and the National Register of Historic Places. Additionally, Health and Safety Code 7050.5, California Environmental Quality Act 15064.5(e), and Public Resources Code 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Implementation of the proposed Project would not result in the physical alteration of or context of any historical resource that would cause a substantial adverse change in the significance of a historical resource. The proposed Project would, therefore, not adversely affect the design, character, or feeling associated with any nearby historical resource. Accordingly, this exception does not apply.

## 5.0 ADDITIONAL FINDINGS

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A Categorical Exemption is not available for any project that requires mitigation measures to reduce potential environmental impacts to less than significant. In addition to the findings stated previously, additional topics are discussed below to further demonstrate that no potential significant environmental impacts are expected to occur as a result of the proposed Project.

### 5.1 Aesthetics

The Project Site is located in an urbanized area, as shown in **Figure 2: Project Site Location Map**. Implementation of the proposed Project would include construction of a new groundwater production well, Well 6, and the installation of associated infrastructure, including a new masonry building to house Well 6 and its mechanical and electrical equipment, as well as approximately 800 feet of new underground 16-inch piping to connect Well 6 to the existing SWD system. The new Well 6 would replace the aging existing Wells 3 and 4, which would be permanently abandoned and demolished. The new masonry block building would be designed to be visually compatible with the surrounding residential neighborhood. All construction activities would occur within previously developed and disturbed areas of the Project Site, and no off-site construction would occur.

As previously discussed, the Project Site is located approximately 0.05 miles south of Orange County Route S18 (S18) and 0.75 miles east of State Route 55 (SR-55). These routes are not designated as eligible or official State scenic highways. The nearest State scenic highway is State Route 91, approximately 2.5 miles north of the Project Site.<sup>14</sup> The County has designated a portion of State Route 91 as a viewscape corridor; however, it is not within the Project Site vicinity.<sup>15</sup> The City does not identify any designated scenic routes.<sup>16</sup> The Project Site does not contain any unique ecological, geologic features, or rock outcroppings. The proposed Project would not require alterations to any undisturbed land or changes to the existing use or character of the Project Site as the Project Site contains two (2) active groundwater wells at the SWD headquarters property, and an inactive well at the Well 4 site.

Upon completion of the proposed Project, the Project Site would operate the same as existing conditions and would not introduce any new sources of light or glare. For these reasons, the proposed Project would not result in any significant aesthetic impacts.

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14 California Department of Transportation. "California Scenic Highway Mapping System."

15 County of Orange. *Scenic Highway Plan*.

16 City of Villa Park. *General Plan: Circulation Element*.

## 5.2 Agricultural and Forestry Resources

The SWD headquarters property has a City of Villa Park land use designation of Estate Low Density Residential (1.75 DU/AC)<sup>17</sup> and is zoned Public Institution.<sup>18</sup> The E-4 Zone is established to provide for the development of medium-low density single-family residential neighborhoods, and the R-1 Zone is established to provide for the development of medium-density single-family residential neighborhoods.<sup>19</sup>

The Well 4 site is located within unincorporated Orange County, specifically the Santiago Creek unincorporated island, which has an Orange County land use designation of Open Space<sup>20</sup> and is zoned SG (Sand and Gravel Extraction).<sup>21</sup> The Open Space land use designation provides for limited land uses that do not require a commitment of significant urban infrastructure, including land containing non-renewable and renewable resource areas, prime agricultural soils, and water resource areas.<sup>22</sup> However, the California Government Code exempts the development of water and wastewater infrastructure projects initiated by water agencies from County and City building and zoning ordinances.<sup>23</sup>

The California Department of Conservation identifies the Project Site as “Urban and Built-Up Land” and does not identify the Project Site as Important Farmland.<sup>24</sup> The Project Site does not contain any farmland or agricultural land that could be potentially impacted by implementation of the proposed Project. Therefore, there would be no significant impacts to farmland or agricultural land.

## 5.3 Air Quality

The proposed Project is located in the southern portion of the City of Villa Park (City), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Significant air quality impacts could occur if a project were inconsistent with the applicable Air Quality Management Plan (AQMP) or exceeded the quantified thresholds developed by the SCAQMD.

The SCAQMD is the agency principally responsible for comprehensive air pollution control in Los Angeles and prepared the AQMP, which contains strategies and policies for achieving air quality standards and healthy air. The AQMP relies upon SCAG growth projections, which are based on cities’ general plan land use and zoning parameters. Projects that do not result in or contribute to air quality violations and are consistent with the growth forecasts of the AQMP are considered consistent with

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17 City of Villa Park. *General Plan: Land Use Element*. Exhibit II-1: Land Use Policy Map.

18 City of Villa Park. *Zoning Map*.

19 City of Villa Park, California. *Code of Ordinances*, Chapter XXIII: Zoning.

20 County of Orange. *Orange County General Plan: Land Use Designations*.

21 Orange County Public Works. *Zoning Districts: Unincorporated County of Orange, California*.

22 County of Orange. *Orange County General Plan: Land Use Element*.

23 California Government Code. Section 53091(d) and €.

24 California Department of Conservation. "Important Farmland Finder." Database. Accessed November 2025. <https://maps.conservation.ca.gov/DLRP/CIFF/>.

the AQMP.<sup>25</sup> The proposed Project would not change the existing land uses as included in the City's General Plan and reflected in SCAG's growth projections for the City. Additionally, the proposed Project would include the construction of a new groundwater production well, Well 6, at the SWD headquarters property, and would not include any residential uses. As such, the proposed Project would not exceed the assumptions utilized in preparing the AQMP and is consistent with the land use assumptions on which the AQMP is based. Nor would the proposed Project delay the timely attainment of the air quality standards or the interim emission reductions specified in the AQMP. As discussed below, the proposed Project would not cause or contribute to new air quality violations nor increase the frequency or severity of existing air quality violations. Therefore, the proposed Project would be consistent with the AQMP.

In addition, the SCAQMD has developed quantified thresholds for identifying regional and localized air quality violations from both construction and operation of a project. To evaluate the proposed Project against these quantified thresholds, an estimate of emissions was prepared utilizing the California Emissions Estimator Model (CalEEMod), the tool recommended by SCAQMD.

### **Construction**

Estimated construction emissions were quantified based on the type and number of equipment associated with construction of a new groundwater production well and the installation of associated infrastructure. The emissions were estimated using the CalEEMod software, a program recommended by SCAQMD. The input values for construction equipment were based on default assumptions in CalEEMod for a project of this size and type with adjustments made to various inputs based on site-specific information and project-specific activities determined through consultation with the applicant and experience with similar projects. The default values are based on construction surveys conducted by SCAQMD and may not fully reflect the type of site and project that is being evaluated. Adjustments are recommended by SCAQMD when supported by information specific to the location or the project. The adjustments made for the proposed Project include the anticipated construction schedule, equipment for each phase, vehicle trips and the quantity of debris and soil to be hauled off-site, all of which have been calibrated to the specifics of the Project Site and the proposed Project. Further details are provided in **Air Quality and Greenhouse Gas Study (Appendix C)**.

Emissions calculations assumed (1) all construction activities would be conducted in compliance with the SCAQMD rules pertaining to Fugitive Dust (Rule 403)<sup>26</sup> and Architectural Coatings (Rule 1113);<sup>27</sup> and (2) heavy-duty diesel equipment engines would meet minimum Tier 3 standards in

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25 South Coast Air Quality Management District (SCAQMD). *CEQA Air Quality Handbook*. April 1993. p. 12-3.

26 SCAQMD. *Rule 403: Fugitive Dust*. Accessed November 2025. <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

27 SCAQMD. *Rule 1113: Architectural Coatings*. Accessed November 2025. <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

accordance with CARB fleet requirements. CalEEMod also takes into account the latest Title 24 building and energy standards.<sup>28</sup>

Select construction activities during the Well Drilling Phase would occur on a 24-hour schedule, such as drilling, development, and pump testing, which must be performed continuously for technical reasons. These activities require uninterrupted operation to maintain the stability of the borehole, prevent collapse of the well casing, and ensure accurate measurement of groundwater characteristics during testing. The most conservative estimate includes up to five separate 5-day periods of continuous 24-hour operation. **Table 2: Maximum Construction Emissions** presents the maximum estimated daily emissions anticipated to occur throughout the duration of Project construction. As shown, maximum daily emissions during construction of volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) would be below the applicable SCAQMD maximum daily emission thresholds.

TABLE 2: MAXIMUM CONSTRUCTION EMISSIONS						
Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
	pounds/day					
2026	3.5	28.0	38.0	0.1	1.4	1.1
2027	1.0	8.4	8.1	<0.1	0.3	0.3
<b>Maximum</b>	<b>3.5</b>	<b>28.0</b>	<b>38.0</b>	<b>0.1</b>	<b>1.4</b>	<b>1.1</b>
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
<b>Threshold exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: CO = carbon monoxide; NO<sub>x</sub> = nitrogen oxides; PM<sub>10</sub> = particulate matter less than 10 microns; PM<sub>2.5</sub> = particulate matter less than 2.5 microns; SO<sub>x</sub> = sulfur oxides; VOC = volatile organic compounds.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

Source: Refer to **Appendix C: Air Quality and Greenhouse Gas Study**.

### Operation

The proposed Project would construct one new well in the City of Villa Park, Well 6, which would replace the existing Well 3. Wells 3 and 4 would be permanently abandoned and demolished as part of the Project. After implementation of the proposed Project, only one well would operate at a given time, either Well 5 or the new Well 6, because simultaneous operation of both wells would exceed the 3,000-gpm capacity of the existing PFAS Water Treatment Plant. The maximum production capacity of the system would remain at 3,000 gpm. Accordingly, the proposed Project would not increase the District’s overall water production capacity or system throughput or increase the number of active wells on site.

28 California Energy Commission. *Building Energy Efficiency Standards for Residential and Nonresidential Buildings*. 2022. Accessed November 2025. [https://www.energy.ca.gov/sites/default/files/2022-12/CEC-400-2022-010\\_CMF.pdf](https://www.energy.ca.gov/sites/default/files/2022-12/CEC-400-2022-010_CMF.pdf).

Operational emissions would result primarily from employees using passenger vehicles traveling to and from the Project Site. An estimated 12 daily trips were estimated for the proposed Project based on the six (6) full-time employees at the SWD facility. As shown below in **Table 3: Maximum Operational Emissions**, the estimated emissions would not be capable of exceeding SCAQMD thresholds. Operational emissions for the proposed Project would not generate air quality emissions that would exceed SCAQMD’s operational thresholds.

TABLE 3: MAXIMUM OPERATIONAL EMISSIONS						
Source	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
	pounds/day					
Mobile	<0.1	<0.1	0.3	<0.1	0.1	<0.1
Area	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
<b>Total</b>	<b>0.1</b>	<b>&lt;0.1</b>	<b>0.3</b>	<b>&lt;0.1</b>	<b>0.1</b>	<b>&lt;0.1</b>
<i>SCAQMD Mass Daily Threshold</i>	55	55	550	150	150	55
<b>Threshold exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: CO = carbon monoxide; NO<sub>x</sub> = nitrogen oxides; PM<sub>10</sub> = particulate matter less than 10 microns; PM<sub>2.5</sub> = particulate matter less than 2.5 microns; SO<sub>x</sub> = sulfur oxides; VOC = volatile organic compounds.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

Source: Refer to **Appendix C: Air Quality and Greenhouse Gas Study**.

### Localized Significance Thresholds

The SCAQMD Final Localized Significance Threshold (LST) Methodology<sup>29</sup> provides guidance on analysis of localized air quality impacts. SCAQMD provides LST thresholds based on the size and location of the site. For evaluation purposes, the SCAQMD territory is divided into 38 source receptor areas (SRAs). These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. The Project Site is within SRA 8, West San Gabriel Valley.<sup>30</sup> Maximum daily LST values were derived for emissions of NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> that would be generated during construction and operation of projects. **Table 4: Localized Construction and Operational Emissions** provides the estimated maximum daily on-site emissions generated by the proposed Project during construction and operation. As shown, on-site emissions during construction and operation would not exceed the applicable LSTs.

29 SCAQMD. *Final Localized Significance Threshold Methodology*. 2008, p. 3-3. Accessed November 2025. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>.

30 SCAQMD. *General Forecast Areas and Air Monitoring Areas*. Map. Accessed November 2025. <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf>.

TABLE 4: LOCALIZED CONSTRUCTION AND OPERATIONAL EMISSIONS

Source	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
	On-Site Emissions (pounds/day)			
<b>Construction</b>				
Total maximum emissions	15.0	21.0	0.6	0.5
<i>LST threshold</i>	109	686	6	4
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Operational</b>				
Project area/energy emissions	15.0	21.0	0.6	0.5
<i>LST threshold</i>	109	686	6	4
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.

CO = carbon monoxide; NO<sub>x</sub> = nitrogen oxides; PM<sub>10</sub> = particulate matter less than 10 microns; PM<sub>2.5</sub> = particulate matter less than 2.5 microns; SO<sub>x</sub> = sulfur oxides; VOC = volatile organic compounds.

Thresholds based on a distance to sensitive receptors of 25 meters and based on Project size of 1.97 acres.

Source: Refer to **Appendix C: Air Quality and Greenhouse Gas Study**.

SCAQMD has stated that if an individual project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants, without needing to consider the contribution of related projects.<sup>31</sup> The proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance and therefore the proposed Project would not generate a cumulatively considerable increase. Accordingly, the proposed Project would not result in significant impacts on air quality.

### Odors

As shown in **Table 4**, construction of the proposed Project would result in emissions below the localized significance thresholds. Mandatory compliance with SCAQMD *Rule 1113* would limit the number of VOCs in architectural coatings and solvents. According to SCAQMD, while almost any source may emit objectionable odors, some land uses are more likely to produce odors because of their operation. Land uses more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding manufacturing, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants. The Project Site does not contain any active manufacturing activities and would not convert current agricultural land to residential land uses. Therefore, objectionable odors would not be emitted by the proposed Project.

Any unforeseen odors generated by the proposed Project would be controlled in accordance with SCAQMD *Rule 402*. As previously noted, *Rule 402* prohibits the discharge of air contaminants that harm, endanger, or annoy individuals or the public; endanger the comfort, health, or safety of individuals or the public; or cause injury or damage to business or property. Failure to comply with

31 SCAQMD. "White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions." *Board Meeting, Agenda No. 29*. September 5, 2003. Accessed November 2025.  
<http://www3.aqmd.gov/hb/2003/September/030929a.html>.

Rule 402 could subject the offending facility to possible fines and/or operational limitations in an approved odor control or odor abatement plan.

The proposed Project would not conflict with the implementation of any regulations set forth by the SCAQMD or violate any air quality standard, nor contribute substantially to an existing project air quality violation. Therefore, the proposed Project would not result in significant impacts related to objectionable odors.

## 5.4 Biological Resources

The Project Site is generally located in the southern portion of the City of Villa Park and Orange County within a primarily urban residential area, and has been previously disturbed and developed. The Project Site encompasses both the SWD headquarters property at 18021 Lincoln Street and the nearby Well 4 site at the intersection of Villa Park Road and Lemon Street; together, these two properties comprise the entirety of the approximately 2-acre Project Site.<sup>32</sup> The SWD headquarters property contains a PFAS Water Treatment Plant, administrative facilities, and two active groundwater wells, Well 3 and Well 5. The Well 4 site contains an inactive well that has been taken out of service.

ELMT Consulting prepared a Biological Resources Assessment for the proposed Project including a literature review and records search for the Project Site, as well as a field survey conducted on September 10, 2025. The following discussion summarizes the findings of the Biological Resources Assessment prepared for the proposed Project (**Appendix D**).

### ***Vegetation***

The Project Site is fully developed and supports only ornamental and ruderal vegetation typical of disturbed urban environments. Vegetation observed during the field survey included eucalyptus, gold medallion tree, Italian cypress, bottlebrush, magnolia, bougainvillea, bird of paradise, rattlesnake sandmat, Russian thistle, fennel, and Mediterranean mustard. No native plant communities or natural habitats occur within the Project Site.

The Biological Resources Assessment identified ten (10) special-status plant species known to exist within the broader region. However, none were observed during the field survey, and no suitable habitat for these species is present within the Project Site due to ongoing disturbance, soil compaction, and the absence of native vegetation. The Project Site therefore does not contain suitable habitat for any special-status plant species, and no impacts to special-status vegetation would occur.

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<sup>32</sup> The SWD headquarters property is approximately 85,731 square feet (1.97 acres), and the Well 4 site is approximately 2,113 square feet, for a total Project Site size of 87,844 square feet (2.02 acres).

### **Wildlife**

Wildlife observed on the SWD headquarters property included common, urban-adapted species such as house finch, American crow, dark-eyed junco, and desert cottontail. At the Well 4 site and in adjacent open space, additional species were observed, including California towhee, red-tailed hawk, snowy egret, great blue heron, double-crested cormorant, and coyote. Western fence lizard was also detected.

The Biological Resources Assessment identified 58 special-status wildlife species known to exist within the broader region. Of these, several may occur in the vicinity of the Well 4 site due to its proximity to the Santiago Creek Recharge Basin, including Cooper’s hawk, sharp-shinned hawk, red-diamond rattlesnake, California horned lark, yellow warbler, and least Bell’s vireo. Coastal California gnatcatcher, a federally listed Threatened species, was observed foraging outside the Project Site on vegetated slopes south of the Well 4 site.

Despite the presence of suitable habitat in adjacent open space, the Project Site itself is entirely developed and disturbed and does not support suitable habitat for any special-status wildlife species. All construction activities would occur within previously developed and disturbed areas of the Project Site, avoiding any off-site native habitats. Accordingly, no direct or indirect impacts to special-status wildlife species or their habitats would occur as a result of the proposed Project.

Although no active nests were observed during the September 2025 field survey, ornamental vegetation and adjacent open space may provide nesting habitat for birds protected under the Migratory Bird Treaty Act and California Fish and Game Code. Consistent with the recommendations of the Biological Resources Assessment, if construction or vegetation removal occurs during the nesting season (February 1 through August 31), a pre-construction nesting bird clearance survey would be conducted within three days prior to ground disturbance. If any active nests are detected, an appropriate no-disturbance buffer would be established until the nest is no longer active. With the implementation of this standard avoidance measure, the proposed Project would not result in significant impacts to nesting birds.

### **Migratory Corridors and Linkages**

The SWD headquarters property is fully developed within a residential neighborhood and does not contribute to wildlife movement or linkage functions. Although the Well 4 site is also developed, it is located immediately north of the Santiago Creek Recharge Basin, which contributes to a broader network of open space extending to Weir Canyon, Santiago Canyon, and the Santa Ana Mountains. These regional open-space lands provide opportunities for wildlife movement and dispersal. However, all construction activities would occur within previously developed and disturbed areas of the Project Site. No native habitat, corridor area, or open-space connection would be removed or modified.

As described in the Biological Resources Assessment, the Project Site is located within the boundary of the County of Orange Central & Coastal Subregion Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP). However, the Project Site is not located within any Reserve areas, authorized open-space linkages, or designated conservation areas, nor does it support habitat types relied upon by NCCP/HCP-covered species. Implementation of the proposed Project would not affect or interfere with any NCCP/HCP conservation objectives. Accordingly, the proposed Project would not impede wildlife movement, migratory corridors, regional habitat linkages, or NCCP/HCP conservation lands.

### ***Jurisdictional Areas***

No jurisdictional waters, wetlands, or streambed features were identified within the Project Site. The nearest aquatic resources occur more than 130 feet southeast of the Well 4 site within the Santiago Creek Recharge Basin, outside of the Project Site and separated by existing disturbed land. Because no jurisdictional features occur within the Project Site, the proposed Project would not impact any waters or wetlands regulated under the Clean Water Act or the California Fish and Game Code, and no state or federal permits are required.

Based on the analysis contained in the Biological Resources Assessment, the Project Site does not support special-status plant species, special-status wildlife habitat, natural communities, or jurisdictional resources. The proposed Project would be confined to fully developed and disturbed areas and would not affect biological resources in adjacent open space. Implementation of the recommended pre-construction nesting bird clearance survey ensures compliance with applicable wildlife protection regulations. Accordingly, the proposed Project would not result in any significant impacts to biological resources.

## **5.5 Cultural Resources**

The Project Site has been previously disturbed and developed. The SWD headquarters property contains a PFAS Water Treatment Plant, administrative facilities, and two active groundwater wells, Well 3 and Well 5. The Well 4 site contains an inactive well that has been taken out of service. As previously discussed, implementation of the proposed Project would include the construction of a new groundwater production well and the installation of associated infrastructure, as well as the demolition of two (2) aging existing wells. All construction activities would occur within previously developed and disturbed areas of the Project Site, and no off-site construction would occur.

A Cultural Resources Desktop Review (**Appendix B**) was completed for the proposed Project in October 2025, which included a records search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC). Additionally, a review of historical map records, aerial photographs, USGS survey plats and General Land Office (GLO) plats were completed. The records search indicated that 23 previous cultural resource studies have been

conducted within one (1) mile of the Project Site since 1976. Of these, one (1) study (OR-00801) intersects with the Project Site at the Well 4 site.

The records search also identified four (4) previously documented cultural resources within one (1) mile of the Project Site. Of these resources, three (3) were historic-period buildings and one (1) was a prehistoric resource. No cultural resources were identified within the Project Site.

A review of historic aerial imagery and topographic maps indicates that the Project Site and surrounding area have undergone continuous residential development since 1964, and the Project Site has been previously disturbed. As all construction activities would occur within previously developed and disturbed areas of the Project Site, no alterations to undisturbed land would occur.

Based on these findings, no cultural resources would be impacted by the proposed Project. If subsurface cultural resources are unearthed on the Project Site during construction activities, the proposed Project would comply with the criteria outlined by the California Register of Historic Resources<sup>33</sup> and the National Register of Historic Places.<sup>34</sup> Additionally, Health and Safety Code 7050.5, California Environmental Quality Act 15064.5(e), and Public Resources Code 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

For these reasons, the proposed Project would not adversely affect the design, character, or feeling associated with any nearby historical or cultural resource. Therefore, no significant impacts to cultural resources would occur.

## 5.6 Energy

The following analysis estimates the proposed Project's electricity and transportation fuel usage and evaluates whether the proposed Project would result in wasteful, inefficient, or unnecessary consumption of energy. In accordance with Appendix F of the CEQA Guidelines,<sup>35</sup> the analysis includes relevant information to address the energy implications of the proposed Project. The supporting energy calculations are included in **Appendix E**.

### **Construction**

During construction, energy would be consumed on a limited basis in the form of electricity associated with powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas.

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33 California Office of Historic Preservation. "California Register of Historic Places." Accessed November 2025. [https://ohp.parks.ca.gov/?page\\_id=21238](https://ohp.parks.ca.gov/?page_id=21238).

34 California Office of Historic Preservation. "California Historical Resources." Ventura County. Accessed November 2025. <https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=56>.

35 California Natural Resources Agency. "Appendix F: Energy Conservation." *California Environmental Quality Act Guidelines (CEQA Guidelines)*.

Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment, construction worker travel, haul trips, and delivery trips.

**Table 5: Summary of Energy Use During Construction** summarizes the quantity of petroleum fuels that would be consumed during construction. As shown in **Table 5**, it is estimated that construction of the proposed Project would require 37,827 gallons of fuel.

TABLE 5: SUMMARY OF ENERGY USE DURING CONSTRUCTION	
Fuel Type	Quantity (gallons)
Off-Road Construction Equipment	36,151
Construction Worker	1,359
Construction Vendor (MDT & HDT Trucks)	317
<b>Total</b>	<b>37,827</b>

Source: Refer to **Appendix E** for detailed calculations.

### Construction Equipment Fuel Estimates

Fuel consumed by construction equipment would be the primary energy resource expended over the course of Project construction. Fuel consumed by construction equipment was evaluated with the following assumptions:

- Construction schedule of approximately 15 months.
- All construction equipment was assumed to run on diesel fuel.
- Typical daily use of eight (8) hours, with some equipment operating for approximately six (6) hours.
- Aggregate fuel consumption rate for all equipment was estimated at 18.5 horsepower hours per gallon (hp-hr/gal).<sup>36</sup>
- Diesel fuel would be the responsibility of the equipment operators/contractors and would be sourced within the region.
- Project construction represents a “single-event” for diesel fuel demand and would not require on-going or permanent commitment of diesel fuel resources during long-term operation.

Using the CalEEMod data input for the air quality and greenhouse gas analyses, the Project’s construction phase would consume electricity and fossil fuels as a single energy demand; that is, once construction is completed their use would cease. CARB’s 2022 Emissions Factors Tables show

36 California Air Resources Board (CARB). *The Carl Moyer Program Guidelines*. Table D-21: Fuel Consumption Rate Factors (bhp-hr/gal). 2017. Accessed November 2025. [https://ww2.arb.ca.gov/sites/default/files/classic/msprog/moyer/guidelines/2017/2017\\_cmpgl.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/msprog/moyer/guidelines/2017/2017_cmpgl.pdf).

that, on average, aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr/gal.

### Construction Worker Fuel Estimates

It is assumed that construction worker trips range from light-duty autos (LDA), light duty truck 1 (LDT1), and light duty truck 2 (LDT2) at a mix of 25 percent, 50 percent, and 25 percent, respectively, along area roadways.<sup>37</sup> Data regarding Project-related construction worker trips were based on CalEEMod model defaults.

Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analyses using information generated from CARB's 2021 Emissions Factor Model (EMFAC) (refer to **Appendix E** for data). An aggregate fuel efficiency of 26.02 miles per gallon (mpg) was used to calculate VMT for construction worker trips. **Table 5** shows that an estimated 1,359 gallons of fuel would be consumed for construction worker trips.

### Construction Hauling Fuel Estimates

Data regarding Project-related construction worker trips were based on CalEEMod model defaults. For architectural coatings, it is assumed that contractors would be responsible for bringing coatings and equipment with them in their light-duty vehicles. Therefore, vendors delivering construction material or hauling debris from the site during grading and building construction would use medium-to heavy-duty vehicles with an average fuel consumption of 7.75 mpg for medium-duty trucks and 6.05 mpg for heavy-duty trucks. **Table 5** shows that an estimated 317 gallons of fuel would be consumed for haul truck trips.

### Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately twenty-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. There are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy-intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the proposed Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel.

The proposed Project would utilize construction contractors which practice compliance with applicable CARB regulations regarding retrofitting, repowering, or replacement of diesel off-road construction equipment. Additionally, CARB has adopted the Airborne Toxic Control Measures<sup>38</sup> to

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37 *CalEEMod User's Guide* Appendix C (April 2022) states that construction work trips are made by a fleet consisting of 25 percent light-duty auto (or passenger car), 50 percent light-duty truck type 1 (LDT1), and 25 percent light-duty truck type 2 (LDT2).

38 CARB. "Airborne Toxic Control Measures." Accessed November 2025. <https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures>.

## 5.0—Additional Findings

limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other TACs. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.

Additionally, as required by California Code of Regulations (CCR) Title 13-Motor Vehicles, Section 2449(d)(3) Idling, idling times of construction vehicles are limited to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by County building officials, and/or in response to citizen complaints.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure. As a result, the proposed Project would not result in inefficient, or unnecessary consumption of transportation resources during construction. Accordingly, transportation resource demands during construction would be less than significant.

### **Operation**

Operation of the proposed Project would require electricity to convey the water that SWD supplies annually from the wells. By 2028, when the proposed new well is anticipated to be completed and operational, Southern California Edison's (SCE) demand is expected to be approximately 113,615 GWh.<sup>39</sup> SCE is prepared to meet this demand. For a conservative estimate, the proposed Project's energy demand was compared to the baseline demand energy forecast for SCE. It is estimated that the proposed Project would consume 6,442,244 kWh (6.4 GWh) of electricity per year. This is estimated based on the default electricity use by General Light Industrial uses by CalEEMod and the electricity needed to convey the 2,900 acre-feet of water supplied annually by SWD. This would be less than 0.01 percent of electricity delivered by SCE in 2028.

Transportation energy consumption from the proposed Project would result from the estimated 12 trips per weekday based on the six (6) full-time employees at the SWD Headquarters. The proposed Project operations would consume approximately 1,379 gallons of petroleum per year (860 gallons of gasoline and 519 gallons of diesel). The Energy Information Administration (EIA) forecasts a national oil supply of 16.1 million barrels (mb) per day in 2028, which is the year of operation for the

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39 California Energy Commission. *California Energy Demand 2024-2040*. Accessed November 2025.  
<https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2024-integrated-energy-policy-report-0>.

proposed Project.<sup>40</sup> This equates to approximately 264,442 million gallons (mg) per year. Operation of the proposed Project would account for less than 0.01 percent of the projected annual oil supply in 2028.

The proposed Project would not result in wasteful, inefficient or unnecessary consumption of energy resources during construction or operation. Impacts would be less than significant.

### 5.7 Geology and Soils

The Project Site is relatively flat, with the SWD headquarters property located approximately 320 feet above mean sea level, and the Well 4 site located at approximately 355 feet above mean sea level. The SWD headquarters property is underlain by Modjeska gravelly loam (0 to 2 percent slopes) and Myford sandy loam, thick surface (0 to 2 percent slopes). The Well 4 site is underlain by Modjeska gravelly loam (0 to 2 percent slopes). Soils onsite have been significantly compacted following decades of disturbance and development.<sup>41</sup>

The City of Villa Park does not identify any mineral resource areas within city limits,<sup>42</sup> and the Project Site is not located within the boundaries of a County-identified Mineral Resource Zone or Oil and Gas Resource Zone.<sup>43</sup> The Project Site is not located within a State of California Geological Survey identified Earthquake Fault Zone and Alquist-Priolo Earthquake Fault Zone.<sup>44</sup> The nearest fault to the Project Site is the El Moderno Fault, located approximately 1.15 miles north of the SWD headquarters property, and approximately 1.0 miles north of the Well 4 site. The SWD headquarters property is not within a landslide area, and the Well 4 site has a low to medium risk of landsliding.<sup>45</sup> However, the proposed Project would permanently abandon and demolish Well 4, and implementation of the proposed Project would not exacerbate landsliding risks.

The Project Site is not located within a liquefaction area.<sup>46</sup> A Preliminary Well Design Report (**Appendix F**) was prepared for the proposed Project, which indicates that standard drilling methods are appropriate for the Project Site, based on existing geological conditions. The proposed well excavation would extend to approximately 750 feet below ground surface, with the complete production well casing placed between approximately 400 and 730 feet below ground surface. The

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40 U.S. Energy Information Administration. *Annual Energy Outlook 2025*. Accessed November 2025. <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2025&sourcekey=0>.

41 See **Appendix F**.

42 City of Villa Park. *General Plan: Open Space/Conservation Element*. Accessed November 2025. <https://villapark.org/LinkClick.aspx?fileticket=SH6689WJbN4%3d&portalid=0>.

43 County of Orange. *Orange County General Plan*. Chapter VI. Resources Element: Orange County Mineral Resources. Figure VI-3. Accessed November 2025. <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/import/data/files/8625.pdf>.

44 California Department of Conservation. "Alquist-Priolo Site Investigation Reports." Accessed November 2025. <https://maps.conservation.ca.gov/cgs/informationwarehouse/apereports/>.

45 USGS. "U.S. Landslide Inventory and Susceptibility." Accessed November 2025. <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d>.

46 California Department of Conservation. "Earthquake Zones of Required Investigation." Accessed November 2025. <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>.

design and construction of the proposed Project would conform to the 2022 California Building Codes and the 2023 Orange County Building Codes, which include seismic safety provisions. For these reasons, the proposed Project would not have a significant impact on geology and soils.

## 5.8 Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are called greenhouse gases (GHG), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California.

The principal GHGs are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H<sub>2</sub>O). CO<sub>2</sub> is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO<sub>2</sub> equivalents (CO<sub>2</sub>e). GHG emissions from construction and operation of the proposed Project were quantified using the CalEEMod model, as recommended by the SCAQMD, and are available in **Appendix C: Air Quality and Greenhouse Gas Study** to this document.

### ***Construction***

Construction activity impacts are relatively short in duration, and they contribute a relatively small portion of the total lifetime GHG emissions of a project. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, no basis exists for concluding that the proposed Project's small and essentially temporary (primarily from construction) increase in emissions could cause a measurable increase in global GHG emissions necessary to force global climate change.

The forecasting of construction-related GHG emissions requires assumptions regarding the timing of construction as the emission factors for some of the proposed Project's construction-related GHG emission sources decline over time.

As shown in **Table 6: Construction GHG Emissions**, total construction emissions would be 475 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e). These emissions would be temporary and would not continue once the site improvements are complete. SCAQMD's Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold recognizes that construction-related GHG emissions from projects occur over a relatively short-term period of time and contributes a relatively small portion of a project's overall lifetime GHG emissions. The guidance recommends that a project's construction-related GHG emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operation GHG

reduction strategies.<sup>47</sup> As shown in **Table 6**, when amortized over an average 30-year Project lifetime, average annual construction emissions from the proposed Project would be 16 MTCO<sub>2</sub>e per year.

TABLE 6: CONSTRUCTION GHG EMISSIONS	
Construction Phase	MTCO <sub>2</sub> e/Year
2026	358
2027	117
<b>Overall Total</b>	<b>475</b>
<b>30-Year Annual Amortized Rate</b>	<b>16</b>

Notes: GHG = greenhouse gas; MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent.

Source: **Appendix C: Air Quality and Greenhouse Gas Study.**

### Operation

Operation of the proposed Project has the potential to generate GHG emissions through vehicle trips traveling to and from the Project Site as well from the energy needed to distribute the 2,900 AF of water supplied per year by SWD. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, and waste management would occur every year after full development of the uses allowed by the proposed Project. Operational Project emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are shown in **Table 7: Operational GHG Emissions**. Operation of the proposed Project has the potential to generate minor GHG emissions through vehicle trips traveling to and from the Project Site for maintenance activities, and as such 12 daily trips was conservatively assumed to estimate mobile emissions based on SWD employment of six (6) full-time employees. As shown in **Table 7**, the total annual emission would be 2,876 MTCO<sub>2</sub>e per year.

TABLE 7: OPERATIONAL GHG EMISSIONS	
Source	Unmitigated MTCO <sub>2</sub> e per year
Construction (amortized)	16
Mobile	11
Energy	5
Area	<1
Water	2,844
Waste	<1
<b>Total</b>	<b>2,876</b>

Abbreviation: MTCO<sub>2</sub>e = metric tons of carbon dioxide emissions.

Source: **Appendix C: Air Quality and Greenhouse Gas Study.**

47 SCAQMD. *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold*. October 2008.

## 5.0—Additional Findings

The California Air Pollution Control Officers Association (CAPCOA) suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. This includes evaluating a project’s sources of GHG emissions and considering project consistency with applicable emissions reduction strategies and goals.

The proposed Project involves the construction a new groundwater production well, Well 6, at the SWD headquarters property, to replace the existing Well 3, which, along with the existing Well 4, would be permanently abandoned and demolished as part of the Project. The proposed Project would not conflict with the County’s preliminary CAP, which includes goals and policies to reduce GHG emissions 40% by 2030.

The proposed Project would be required to comply with CCR Title 13, Section 2449<sup>48</sup> and the CALGreen Sustainable (Green) Building Program regulations, which include implementation of standard control measures for equipment emissions. Adherence to these regulations, including the implementation of BACMs is a standard requirement for any construction or ground-disturbing activity occurring within the Basin.

BACMs include, but are not limited to, requirements that the project proponent utilize only low sulfur fuel (i.e., having a sulfur content of 15 parts per million [ppm] by weight or less); ensure off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower [hp] and up that were not designed to be driven on the road) limit vehicle idling to five minutes or less; register and label vehicles in accordance with the ARB Diesel Off-Road Online Reporting System; restrict the inclusion of older vehicles into fleets; and retire, replace, or repower older engines or install Verified Diesel Emission Control Strategies (i.e. exhaust retrofits). Additionally, the construction contractor shall recycle/reuse at least 50 percent of the construction material (including but not limited to proposed aggregate base, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) and use “Green Building Materials,” such as those materials that are rapidly renewable or resource-efficient (recycled and manufactured in an environmentally friendly way) to account for at least 10 percent of the construction material, in accordance with CalRecycle regulations. As such, the proposed Project would be consistent with applicable emissions reduction strategies. Impacts would be less than significant.

## 5.9 Hazards and Hazardous Materials

Significant impacts could occur if the Project Site was included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, commonly referred to as the Cortese list. As discussed in the EDR Radius Map Reports (**Appendix A**) prepared for the Project Site, the Cortese list was searched for listings of hazardous materials on the Project Site and within a 0.5-mile radius.

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49 CAL FIRE. “Fire Hazard Severity Zones in State Responsibility Area.” Accessed November 2025. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>.

## 5.0—Additional Findings

The Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Although the SWD headquarters property appears on other regulatory databases, including the Hazardous Waste Tracking System, Hazardous Waste Manifest, and Enforcement and Compliance History Online, these databases are not part of the Cortese list compilation and reflect only routine hazardous materials handling associated with water treatment operations. These listings do not indicate contamination or any corrective action status. The Well 4 site was not identified in any hazardous materials or contamination databases. The nearest hazardous materials sites include two (2) closed leaking underground storage tank (LUST) cases located approximately 0.4 miles northwest of the Project Site that have been fully remediated. As such, no impact would occur.

The proposed Project would not involve the routine use, handling, or transport of hazardous materials that would create a substantial risk to the public. The proposed Project would not exacerbate hazardous conditions related to airports as the nearest airport is the Fullerton Municipal Airport, located approximately 10 miles northwest of the Project Site. The Project Site is not designated within a Moderate, High, or Very High Fire Hazard Severity Zone.<sup>49</sup>

All construction activities would occur within previously developed and disturbed areas of the Project Site, and no off-site construction would occur. No road closures are proposed to accommodate construction of the proposed Project, and no disruption of emergency access or traffic circulation around the Project Site would occur. The proposed Project would not make any changes to the circulation system, would not decrease roadway capacity, would not generate appreciable additional traffic, or change traffic patterns in any way that could cause an impact to the surrounding circulation system, including transit, roadway, bicycle, and pedestrian facilities.

The nearest school to the Project Site is Villa Park Elementary School, approximately 150 feet southeast of the SWD headquarters property and approximately 0.3 miles southwest of the Well 4 site. The proposed Project would not introduce new hazardous materials or operations beyond existing conditions on the Project Site. During construction, any fuels, lubricants, or drilling fluids would be stored, handled, and disposed of in accordance with all applicable, local State, and federal requirements. As a result, the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school and impacts would be less than significant.

Based on these findings, the proposed Project would not pose an environmental hazard to the Project Site or to surrounding areas and impacts related to hazards would not be significant.

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49 CAL FIRE. "Fire Hazard Severity Zones in State Responsibility Area." Accessed November 2025. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>.

## 5.10 Hydrology and Water Quality

As previously discussed, the Project Site is located within a primarily urban residential area and has been previously disturbed and developed. Implementation of the proposed Project would include the construction of a new groundwater production well and the installation of associated infrastructure, as well as the demolition of two (2) aging existing wells. Implementation of the proposed Project would not significantly increase impervious surfaces on the Project Site or increase water runoff relative to existing conditions. The construction of the new groundwater production well and the demolition of Well 3 on the SWD headquarters property would occur within a developed site, and would not significantly increase impervious surfaces. The Well 4 site would only result in the demolition of Well 4, which would not result in the increase of impervious surfaces.

Construction activities would involve excavation that would temporarily expose soils, which could result in soil erosion or the loss of topsoil. The Project Site is greater than one-acre in size and construction activities are subject to the requirements of the statewide NPDES Construction General Permit which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would implement best management practices (BMPs) during construction to reduce soil erosion and pollutant levels to the maximum extent possible, which would result in less than significant impacts regarding surface or ground water quality during construction.

Per the Federal Emergency Management Agency’s (FEMA’s) Flood Insurance Rate Map, the SWD headquarters property is located in FEMA Zone X (0.2 percent annual chance flood hazard). Zone X represents areas outside of the 100-year floodplain and outside Special Flood Hazard Areas. The SWD headquarters property is not located within FEMA Zone AE or a regulatory floodway. The Well 4 site is within FEMA Zone X (areas of minimal flood hazard). The Well 4 site is not within a Special Flood Hazard Area, Zone AE, or the 0.2 percent annual chance flood zone.<sup>50</sup> Therefore, the development of the proposed Project would not place structures within a 100-year flood hazard area or expose people or structures to substantial flood risk. Additionally, the proposed Project would not introduce residential uses to the Project Site and would not place housing or residents within a flood zone. Therefore, the proposed Project would not place structures within any flood hazard areas or result in structures that would impede or redirect flood flows. For these reasons, impacts on hydrology would not be significant.

## 5.11 Land Use and Planning

The SWD headquarters property has a City of Villa Park land use designation of Estate Low Density Residential (1.75 DU/AC)<sup>51</sup> and is zoned Public Institution.<sup>52</sup> The E-4 Zone is established to provide for the development of medium-low density single-family residential neighborhoods, and the R-1

50 Federal Emergency Management Agency (FEMA). “Flood Map Service Center.” Accessed November 2025. <https://msc.fema.gov/portal/search?AddressQuery=18021%20Lincoln%20St%2C%20Villa%20Park%2C%20CA%2092861>.

51 City of Villa Park. *General Plan: Land Use Element*. Exhibit II-1: Land Use Policy Map.

52 City of Villa Park. *Zoning Map*.

Zone is established to provide for the development of medium-density single-family residential neighborhoods.<sup>53</sup>

The Well 4 site is located within unincorporated Orange County, specifically the Santiago Creek unincorporated island, which has an Orange County land use designation of Open Space<sup>54</sup> and is zoned SG (Sand and Gravel Extraction).<sup>55</sup> The Open Space land use designation provides for limited land uses that do not require a commitment of significant urban infrastructure, including land containing non-renewable and renewable resource areas, prime agricultural soils, and water resource areas.<sup>56</sup> However, the California Government Code exempts the development of water and wastewater infrastructure projects initiated by water agencies from County and City building and zoning ordinances.<sup>57</sup>

No changes to land use designations are proposed, no alteration of the street pattern is proposed, and no separation of existing uses or disruption of access would occur with the implementation of the proposed Project. Implementation of the proposed Project would include the construction of a new groundwater production well and the installation of associated infrastructure, as well as the demolition of two (2) aging existing wells, and would not alter the existing use of the Project Site. Development of the proposed Project would comply with applicable site plan review requirements by the City for any on-site structures located at the SWD headquarters property. No structures are proposed to be constructed at the Well 4 site. No significant land use or planning impacts would result from the proposed Project.

### 5.12 Mineral Resources

As previously discussed, the Project Site is located within a primarily urban residential area and has been previously disturbed and developed. The area surrounding the Project Site is comprised of single-family residential neighborhoods and open space.

The SWD headquarters property has a City of Villa Park land use designation of Estate Low Density Residential (1.75 DU/AC)<sup>58</sup> and is zoned Public Institution.<sup>59</sup> The Well 4 site is located within unincorporated Orange County, specifically the Santiago Creek unincorporated island, which has an Orange County land use designation of Open Space<sup>60</sup> and is zoned SG (Sand and Gravel Extraction).<sup>61</sup> The Open Space land use designation provides for limited land uses that do not require a commitment of significant urban infrastructure, including land containing non-renewable and

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53 City of Villa Park, California. *Code of Ordinances*, Chapter XXIII: Zoning.

54 County of Orange. *Orange County General Plan: Land Use Designations*.

55 Orange County Public Works. *Zoning Districts: Unincorporated County of Orange, California*.

56 County of Orange. *Orange County General Plan: Land Use Element*.

57 California Government Code. Section 53091(d) and €.

58 City of Villa Park. *General Plan: Land Use Element*. Exhibit II-1: Land Use Policy Map.

59 City of Villa Park. *Zoning Map*.

60 County of Orange. *Orange County General Plan: Land Use Designations*.

61 Orange County Public Works. *Zoning Districts: Unincorporated County of Orange, California*.

renewable resource areas, prime agricultural soils, and water resource areas.<sup>62</sup> However, the California Government Code exempts the development of water and wastewater infrastructure projects initiated by water agencies from County and City building and zoning ordinances.<sup>63</sup>

As previously discussed, the City of Villa Park does not identify any mineral resource areas within city limits,<sup>64</sup> and the Project Site is not located within the boundaries of a County-identified Mineral Resource Zone or Oil and Gas Resource Zone.<sup>65</sup> The proposed Project's well excavation would extend to approximately 750 feet below ground surface, with the complete production well casing placed between approximately 400 and 730 feet below ground surface. However, the proposed Project would have no impact on the availability of mineral resources within the City or County. Further, no changes to land use designations or zoning are proposed. For these reasons, no significant impacts to mineral resources would occur.

### 5.13 Noise

Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The effects of noise on humans can range from mild stress and annoyance to temporary or permanent hearing loss due to such things as speech interference and sleep deprivation. Prolonged stress, regardless of the cause, is known to contribute to a variety of health disorders. Noise, or the lack thereof, is a factor in the aesthetic perception of some settings, particularly those with religious or cultural significance. Certain land use types are particularly sensitive to noise, including schools, hospitals, rest homes, long-term medical and mental care facilities, and parks and recreation areas. Residential areas are also considered noise sensitive, especially during the nighttime hours.

Construction activity can also result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Buildings founded on the soil near the construction site respond to these vibrations with varying results, ranging from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibrations at moderate levels, and slight damage at the highest levels. Construction vibration would not be considered significant.

#### **Construction**

The Project Site is located in the southern portion of the City of Villa Park (City), approximately 0.05 miles south of Orange County (County) Route S18 (S18) and 0.8 miles east of State Route 55 (SR-55).

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62 County of Orange. *Orange County General Plan: Land Use Element*.

63 California Government Code. Section 53091(d) and €.

64 City of Villa Park. *General Plan: Open Space/Conservation Element*.

65 County of Orange. *Orange County General Plan*. Chapter VI. Resources Element: Orange County Mineral Resources. Figure VI-3.

As shown in **Figure 2: Project Site Location Map**, the Project Site encompasses both the SWD headquarters property at 18021 Lincoln Street and the nearby Well 4 site at the intersection of Villa Park Road and Lemon Street. Sensitive Receptors near the SWD headquarters property include the single-family residential uses located to the north along Villa Park Road, to the west along Fredrick Drive, to east along Radek Court, and to the South along Potter Circle. The nearest sensitive receptors to the Well 4 site include the single-family residential uses located to the north across Villa Park Road along Marion Way and the single-family residential uses located to the west along Park Villa Circle.

Construction of Well 6 would take place within the City of Villa Park on the SWD headquarters property. Section 6-6.5 of the City’s Municipal Code establishes exterior noise standards for residential properties within the City as shown in **Table 8: City of Villa Park Exterior Noise Standards**.

TABLE 8: CITY OF VILLA PARK EXTERIOR NOISE STANDARDS						
Time Period		Cumulative Period				
7:00 AM – 10:00 PM	10:00 PM – 7:00 AM	30 min	15 min	5 min	1 min	Any period
55	50	+0	+5	+10	+15	+20

*Notes: In the event the ambient noise level exceeds any of the above five (5) noise limit categories, the cumulative period applicable to said category shall be increased to reflect said ambient noise level. Furthermore, the maximum permissible noise level shall never exceed the maximum ambient noise level.*

Source: Section 6-6.5 of the City of Villa Park Municipal Code.

Section 6-6.7 (Special Provisions – Generally) of the City of Villa Park Municipal Code states that noise sources associated with construction, repair, remodeling, or grading of any real property are exempt from the noise standards provided that said activities do not take place between the hours of 8:00 PM and 7:00 AM on weekdays, or 8:00 PM and 8:00 AM on Saturday, or at any time on Sunday or a Federal holiday.

Additionally, Section 6-6.13 (Noise Variance Board) of the City of Villa Park Municipal Code establishes that the Noise Variance Board shall evaluate all applications for variance from the requirements of this section and may grant said variances with respect to time for compliance, subject to such terms, conditions and requirements as it may deem reasonable to achieve maximum compliance with the provisions of this section. Said terms, conditions and requirements may include but shall not be limited to limitations on noise levels and operating hours. Each such variance shall set forth in detail the approved method of achieving maximum compliance and a time schedule for its accomplishment. In its determinations, said Board shall consider the magnitude of nuisance caused by the offensive noise; the uses of property within the area of impingement by the noise; the

time factors related to study, design, financing and construction of remedial work; the economic factors related to age and useful life of equipment; and the general public interest and welfare.

Demolition of the existing Well 4 on the Well 4 site would take place in unincorporated Orange County. Section 4-6-5 and Section 4-6-6 of the County Code of Ordinances establishes interior and exterior noise standards for residential properties with unincorporated portions in the County as shown in **Table 9: County of Orange Interior and Exterior Noise Standards**.

TABLE 9: COUNTY OF ORANGE INTERIOR AND EXTERIOR NOISE STANDARDS		
Time Period	Interior Noise Standard (dBA)	Exterior Noise Standard (dBA)
7:00 AM– 10:00 PM	55	55
10:00 PM to 7:00 AM	45	50

Source: Section 4-6-5 and 4-6-6 of the Orange County Code of Ordinances.

Section 4.6-7(e) of the County Code of Ordinances states that noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 PM and 7:00 AM on weekdays, including Saturday, or at any time on Sunday or a Federal holiday are exempt from the County’s noise standards.

Neither the City of Villa Park’s *General Plan* and Municipal Code or the County’s *General Plan* and *Code of Ordinances* establish numeric acceptable source noise levels or noise level increases at potentially affected receivers. To evaluate whether the Project will generate a substantial periodic increase in short-term noise levels at off-site sensitive receiver locations, the Federal Transit Administration (FTA) has identified construction noise thresholds in the *FTA Transit Noise and Vibration Impact Assessment Manual (FTA Report No. 0123, September 2018)*, which limit daytime construction noise to 80 dBA Leq, 8-hour, at residential land uses.

Noise from proposed Project construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities that would occur during the construction phases would generate both steady-state and episodic noise that would be heard both on and off the Project Site. Each construction phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The proposed Project would also require up to five separate 5-day periods of continuous 24-hour operation. Temporary sound walls measuring approximately 25 feet in height would be installed along the property boundaries prior to initiation of drilling activities and would remain in place throughout any 24-hour construction periods. These sound walls would be placed immediately adjacent to property lines to provide maximum noise attenuation for nearby receptors.

## 5.0—Additional Findings

In order to calculate construction noise levels, hourly activities or utilization factors (i.e., the percentage of normal construction activity that would occur, or construction equipment that would be active, during each hour of the day) are estimated based on the temporal characteristics of other previous and current construction projects. The hourly activity factors express the percentage of time that construction activities would emit average noise levels. Typical noise levels for each type of construction equipment were obtained from the FHWA Roadway Construction Noise Model.<sup>66</sup>

An inventory of construction equipment, including the number and types of equipment which would be operating simultaneously within the Project Site, was identified for each phase/component of construction and are provided in **Appendix G: Noise and Vibration Study**. It is highly unlikely that all pieces of construction equipment identified would operate simultaneously in any specific location during construction because equipment is generally operated only when needed and space constraints limit the equipment that can be used at any one time in a specific location. Therefore, this modeling is considered a conservative approach to calculate the maximum noise levels that would be generated.

**Table 10: Construction Maximum Noise Estimates** presents the maximum noise impacts that are forecasted to occur at the nearest sensitive receptors. As shown, average noise levels during construction would not result in increases above the threshold of 80 dBA (Leq-8hour) at the nearby residential uses in the City of Villa Park nor the County of Orange.

TABLE 10: CONSTRUCTION MAXIMUM NOISE ESTIMATES					
Nearest Sensitive Receptors	Calculated Noise Level (Leq-8 hour) by Construction Phase			Significance Threshold	Increase Above Significance Threshold?
	Well Drilling	Demolition	Well Equipping		
Single family residential uses along Frederick Drive	75.6	—	77.9	80	No
Single family residential uses along Park Villa Circle	—	79.4	—	80	No

Notes: Demolition would only include Well 4 (Site 2). No demolition would occur at Site 1.

Well Drilling and Well Equipping would only occur at Site 1. No Well Drilling and Well Equipping would occur at Site 2.

Source: FHWA, RCNM, version. 1.1. Refer to **Appendix G: Noise and Vibration Study**.

66 United States Department of Transportation. *FHWA Roadway Construction Noise Model Final Report*. January 2006. Accessed November 2025. [https://www.fhwa.dot.gov/environment/noise/construction\\_noise/rcnm/rcnm.pdf](https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf).

As the proposed Project would require some construction activities to occur on a 24-hour schedule, such as drilling, development, and pump testing, which must be performed continuously, the proposed Project would be required to comply with the Villa Park Municipal Code Section 6-6.12. This would require the applicant, SWD, to request from the City Health Officer a noise variance for construction equipment, vehicles, or work occurring outside the permitted hours. The Health Officer and City Noise Variance board would determine the appropriateness of the variance request in respect of the proposed Project and public health and welfare.

As modeled, construction noise levels would be below the absolute threshold of 80 dBA Leq(8-hour) and as the proposed Project would comply with the requirements of the City of Villa Park's *General Plan* and Municipal Code and the County's *General Plan* and *Code of Ordinances*, impacts would be less than significant.

### Vibration

The City has not adopted a significance threshold to assess vibration impacts during construction. The evaluation of potential building damage impacts related to construction vibration levels is based on the published data in the FTA guidance.<sup>67</sup> While ground vibrations from construction activities do not often reach the levels that can damage structures, fragile buildings must receive special consideration. As such, the vibration damage criteria adopted by the FTA and applied in this analysis are listed below. Vibration impacts could be potentially significant if the vibration velocity exceeds the following:

- Reinforced-concrete, steel, or timber (no plaster) would exceed 0.5 PPV (inches per second).
- Engineered concrete and masonry (no plaster) would exceed 0.3 PPV.
- Nonengineered timber and masonry buildings would exceed 0.2 PPV.
- Buildings extremely susceptible to vibration damage would exceed 0.12 PPV.

Ground-borne vibration impacts were evaluated by identifying potential vibration sources; estimating the distance between vibration sources, vibration sensitive receptors, and surrounding structure locations; and making a significance determination based on the significance thresholds.

Construction activities for the proposed Project have the potential to generate low levels of ground-borne vibration to vibration-sensitive uses that include the surrounding residential uses. The operation of construction equipment generates vibrations that propagate through the ground and diminish in intensity with distance from the source. Vibration impacts can range from no perceptible

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67 United States Department of Transportation, Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September 2018. Accessed November 2025.  
[https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

**Table 11: On-Site Construction Vibration Impacts—Building Damage** presents the forecasted vibration levels due to on-site construction activities. As shown in **Table 11**, vibration levels generated by on-site construction activities would not exceed the building-damage significance threshold of 0.2 inches per second peak particle velocity (PPV) for nonengineered timber and masonry buildings, including the surrounding residential uses during construction. Vibration impacts would not be significant.

TABLE 11: ON-SITE CONSTRUCTION VIBRATION IMPACTS—BUILDING DAMAGE						
Nearest Off-Site Building Structures	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment					Significance Threshold (PPV)
	Loaded Trucks	Caisson Drilling	Jackhammer	Small bulldozer	Vibratory Roller	
Single family residential uses along Frederick Drive	0.020	0.024	0.009	0.001	0.056	0.2
Single family residential uses along Park Villa Circle	0.007	—	0.003	0.000	0.019	0.2

Notes: Drilling would only occur at Well 6 (Site 1). No drilling would occur at Site 2.

Source: US Department of Transportation, Federal Transportation Authority, *Transit Noise and Vibration Impact Assessment*. Refer to **Appendix G: Noise and Vibration Study**.

### Operation

The Project would construct one new well in the City of Villa Park, Well 6, which would replace the existing Well 3. Well 4 would be permanently abandoned and demolished as part of the Project and there would be no ongoing Project operations at the Well 4 site. After implementation of the proposed Project, only one well would operate at a given time, either Well 5 or the new Well 6, because simultaneous operation of both wells would exceed the 3,000-gpm capacity of the existing PFAS Water Treatment Plant. The maximum production capacity of the system would remain at 3,000 gpm. Accordingly, the proposed Project would not increase the District’s overall water production capacity or system throughput or increase the number of active wells on site. Project operations would result

in the same number of active wells at any time and the same volume of water production as the existing conditions. A new masonry block building would be constructed to house Well 6 and its associated mechanical and electrical equipment. The building would be equipped with acoustic panels for noise attenuation. As such, the proposed Project would not increase the operational noise at either the SWD headquarters property or the Well 4 site compared to the existing operational conditions.

The stationary equipment would be required to comply with the City of Villa Park's Municipal Code Sections 6-6.5 and 6-6.6, which establishes exterior and interior noise standards at all residential properties within the City. Therefore, the well system on the Project Site would not exceed the City's threshold of significance and impacts would be less than significant.

### 5.14 Population and Housing

As previously discussed, implementation of the proposed Project would include the construction of a new groundwater production well and the installation of associated infrastructure, as well as the demolition of two (2) aging existing wells. Development of the proposed Project would provide redundancy in the event another active well becomes temporarily or permanently inoperable and support the District's goal of maintaining a reliable and resilient groundwater system. The proposed Project would not include residential uses or a habitable component that would alter or cause a substantial change in population or housing within the City or County. No impact on population and housing would occur.

### 5.15 Public Services and Recreation

A project could have a significant impact on public services if it were to generate substantial new demand for services through population or employment growth, result in additional demand for service due to insecure design, or cause a decrease in service response times due to traffic congestion.

The Orange County Fire Authority (OCFA) provides general fire services for the City and County, including the Project Site. The OCFA has 77 fire stations, and its front-line apparatus includes 69 fire engines, four (4) paramedic vans, and 17 trucks. Fire Station 2 is located approximately 0.6 miles southwest of the SWD headquarters property site, and approximately 0.98 miles southwest of the Well 4 site, at 2900 East Collins Avenue. Fire Station 23 is located approximately one (1) mile east of the SWD headquarters property site and 0.5 miles east of the Well 4 site, at 5020 Santiago Canyon Road.

The Orange County Sheriff's Department (OCSD) provides sheriff services to the City and County, including the Project Site. The Orange Police Department would serve the Project Site, located approximately 2.55 miles west of the SWD headquarters property site, and 3.0 miles west of the Well 4 site, at 1107 N. Batavia Street.

As previously discussed, the proposed Project would not include residential uses and therefore would not introduce new residents to the City. Implementation of the proposed Project would include the construction of a new groundwater production well and the installation of associated infrastructure, as well as the demolition of two (2) aging existing wells. The development of the proposed Project would not substantially affect the provision of fire or police protection, given that the Project Site is located within a primarily urban residential area and within close proximity to existing fire and police services. Further, development of the proposed Project would provide redundancy to the water system in the event another active well becomes temporarily or permanently inoperable. The proposed Project would not result in a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Therefore, the proposed Project would not create the need to construct new or expanded police, fire protection, or medical facilities, and impacts would not be significant.

The Project Site is located within the Orange Unified School District (OUSD), and the nearest school is Villa Park Elementary School, approximately 150 feet southeast of the SWD headquarters property and approximately 0.3 miles southwest of the Well 4 site. As previously discussed, the proposed Project would not result in population growth, and no impact to schools or other public facilities would occur.

The proposed Project would not increase demand for recreational facilities to the extent that substantial deterioration of nearby recreational facilities would occur or that construction or expansion of recreational facilities would be required. No impact to recreational facilities would occur.

### 5.16 Transportation

As shown in **Figure 1: Regional Location Map**, the Project Site is generally located in Orange County on two sites in the southern portion of the City of Villa Park and Orange County, approximately 0.05 miles south of Orange County Route S18 (S18) and 0.75 miles east of State Route 55 (SR-55).

Construction-related traffic would be short-term and would cause a nominal increase in vehicle trips associated with trucks delivering material or equipment and workers commuting to and from the Project Site. Construction contractors would be expected to follow a haul route exiting SR-55 east at S18, and either continuing east on S18 to access the Well 4 site or turning south on North Wanda Road, then east on Lincoln Street to access the SWD headquarters property. No road closures are proposed to accommodate construction of the proposed Project, and no disruption of emergency access or traffic circulation around the Project Site would occur.

The proposed Project would not alter or change the existing uses of the Project Site. The proposed Project would not make any changes to the circulation system, would not decrease roadway capacity, would not generate appreciable additional traffic, or change traffic patterns in any way that

could cause an impact to the surrounding circulation system, including transit, roadway, bicycle, and pedestrian facilities. No significant impacts to transportation would occur.

### 5.17 Tribal Cultural Resources

As previously discussed, the Project Site is located within a primarily urban residential area and has been previously disturbed and developed. As described in the Cultural Resources Desktop Review (**Appendix B**), no historic or cultural resources were identified within the Project Site, and a review of historic aerial imagery and topographic maps indicates that the Project Site and the surrounding area have undergone continuous residential development since 1964. As all construction activities would occur within previously developed and disturbed areas of the Project Site, no alterations to undisturbed land would occur, and no tribal cultural resources are anticipated to be impacted by the proposed Project.

In the unlikely event that human remains are encountered during construction, Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Orange County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98.<sup>68</sup> The Orange County Coroner would be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify the Most Likely Descendant (MLD), and the MLD may inspect the site of the discovery and complete the inspection within 48 hours of notification by the NAHC. Compliance with these procedures would ensure that any unanticipated discoveries are appropriately managed and would reduce potential impacts to tribal cultural resources to less than significant. Therefore, impacts to tribal cultural resources would not be significant.

### 5.18 Utilities and Service Systems

The Project Site is served by existing utilities, including telecommunication, gas, electric, and water lines. Upon completion of the proposed Project, the Project Site would operate the same as existing conditions. Utilities for telecommunications, natural gas, electricity, water, and sanitary sewer are provided through multiple operators and distributors. Electricity services at the Project Site are provided by Southern California Edison (SCE), telecommunications services are provided by multiple providers, natural gas services are provided by Southern California Gas Company (SoCalGas), water services are provided by SWD and wastewater treatment is provided by Orange County Sanitation District.<sup>69</sup>

Implementation of the proposed Project would maintain a reliable and resilient groundwater supply system by replacing outdated infrastructure with modern, functionally equivalent facilities. As previously discussed, the proposed Project would not result in any increase in overall groundwater

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68 California Public Resources Code, Section 5097.98. Accessed November 2025. [https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=PRC&sectionNum=5097.98](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=5097.98).

69 City of Villa Park. "Villa Park." Accessed November 2025. <https://villapark.co/city-of-villa-park/>.

production capacity or expansion of the District’s water supply system. The proposed Project does not include any additional development that would increase demand for water, wastewater, solid waste, or energy beyond what is currently permitted on the Project Site. Impacts would not be significant.

## 5.19 Wildfire

The Project Site is located within primarily urban residential area and has been previously disturbed and developed. The Project Site is located outside of a Local Responsibility Area (LRA) or State Responsibility Area (SRA) and is not designated within a Moderate, High, or Very High Fire Hazard Severity Zone.<sup>70,71</sup> The proposed Project would not result in any changes to the Project Site that would change or increase fire risks or affect the ability of fire services to access the site in the event of wildfire. Further, development of the proposed Project would provide redundancy to the water system in the event another active well becomes temporarily or permanently inoperable. No impact would occur.

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70 CAL FIRE. “Fire Hazard Severity Zones in State Responsibility Area.” Accessed November 2025. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>.

71 County of Orange. *Orange County General Plan: Safety Element*. Accessed November 2025. <https://ocds.ocpublicworks.com/sites/ocpwoocds/files/2025-08/Chapter%20IX%20-%20Safety%20Element%20-%20Updated%20August%202025.pdf>.