



ORLAND PLANNING COMMISSION SPECIAL MEETING AGENDA

Thursday, April 09, 2026 at 5:30 PM
Carnegie Center, 912 Third Street and via Zoom

P: (530) 865-1600 | www.cityoforland.com

Commission: Stephen Nordbye | Sharon Lazorko

Vernon Montague | Tyler Rutledge | Daniel Louder

City Clerk: Jennifer Schmitke

City Staff: Lisa Lozier, City Planner

Virtual Meeting Information:

<https://us02web.zoom.us/j/82886794302>

Webinar ID: 828 8679 4302 | Zoom Telephone: 1 (669) 900-9128

Public comments are welcomed and encouraged in advance of the meeting by emailing the City Clerk at jtschmitke@cityoforland.com or by phone at (530) 865-1610 by 4:00 p.m. on the day of the meeting

1. CALL TO ORDER - 5:30 PM
2. PLEDGE OF ALLEGIANCE
3. ROLL CALL
4. ORAL AND WRITTEN COMMUNICATIONS

Public Comments:

Members of the public wishing to address the Commission on any item(s) not on the agenda may do so at this time when recognized by the Chairperson. However, no formal action or discussion will be taken unless placed on a future agenda. The public is advised to limit discussion to one presentation per individual. While not required, please state your name and place of residence for the record. (Public Comments will be limited to three minutes).

5. CONSENT CALENDAR

[A.](#) Approve Planning Commission Minutes from February 26, 2026

6. PUBLIC HEARING

[A.](#) **1. Request to Annex (Annex#2026-01)** recommendation to City Council on a proposal to annex approximately 37 acres of land (the project site) located in the unincorporated area of Glenn County

2. Prezone for Annexation (PR#2026-01) The City's prezone for APNs 045-240-002-000, 045-240-011, 045-240-010, and 045-240-013 to the "C-H" (*Highway Service Commercial*) zoning district

Environmental Review: The project has been determined to be *exempt* from further CEQA review pursuant to Section 15183 of the CEQA Guidelines. California Environmental Quality Act (CEQA) Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan for which an Environmental Impact Report (EIR) was certified.

7. **STAFF REPORTS**
8. **FUTURE AGENDA ITEMS**
9. **COMMISSIONER REPORTS**
10. **ADJOURN**

CERTIFICATION: Pursuant to Government Code Section 54954.2(a), the agenda for this meeting was properly posted on April 2, 2026 .

A complete agenda packet is available for public inspection during normal business hours at City Hall, 815 Fourth Street, in Orland or on the City's website at www.cityoforland.com where meeting minutes and video recordings are also available.

In compliance with the Americans with Disabilities Act, the City of Orland will make available to members of the public any special assistance necessary to participate in this meeting. The public should contact the City Clerk's Office 530-865-1610 to make such a request. Notification 72 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.



PLANNING COMMISSION REGULAR MEETING MINUTES

Thursday, February 26, 2026

CALL TO ORDER – The meeting was called to order by Chairperson Stephen Nordbye at 5:30 PM.

PLEDGE OF ALLEGIANCE

ROLL CALL:

Commissioners present:	Chairperson Stephen Nordbye, Commissioners Sharon Lazorko, Daniel Louder(arrived at 5:33 pm), Tyler Rutledge, and Vice Chairperson Vern Montague
Commissioner absent:	None
Councilmember(s) present:	Vice Mayor Enriquez
Staff present:	City Planner Lisa Lozier and City Clerk Jennifer Schmitke

ORAL AND WRITTEN COMMUNICATIONS: None

CONSENT CALENDAR

- A. Approval of Planning Commission Minutes from January 22, 2026

ACTION: Vice Chairperson Montague moved, seconded by Commissioner Rutledge, to approve the consent calendar as presented. Motion carried by a voice vote, 4-0-1, Commissioner Louder absent for vote.

ITEMS FOR DISCUSSION OR ACTION

A. Tree Ordinance Follow-Up

City Planner Lisa Lozier presented an updated staff report following the January 22nd Planning Commission meeting regarding the development of a Tree Ordinance for the City of Orland. The report revisited policy options for either amending Title 17 (Zoning) of the Orland Municipal Code to incorporate tree regulations or pursuing a stand-alone ordinance focused on tree conservation, protection, and maintenance.

Ms. Lozier shared that the Planning Commission discussed the benefits of both approaches and emphasized the importance of including education and community engagement in any future ordinance. At the January 22nd Planning Commission meeting the Commission directed staff to conduct additional research, including outreach to the University of California Cooperative Extension (Glenn County), consultation with arborists and the Master Gardener program, exploration of broader public outreach efforts, and research into developing a Heritage Tree Policy.

Ms. Lozier shared that, staff identified several resources, including contacts at UC Cooperative Extension–Glenn County, the Master Gardener Arborist Program and weekly plant clinic, the Urban Forest Ecosystems Institute’s Cal Poly’s Selectree Database for climate-appropriate tree selection, and University of California Agriculture and Natural Resources Publication 21538, a management guide for oak trees intended for woodland owners and managers.

Ms. Lozier noted that she attached additional reference materials to the staff report, including the City of Willows tree ordinance and master tree list, as well as the City of Orland 2021 tree list.

Orland resident Jan Walker provided background on the former tree committee, discussed the work of the Master Gardeners, and referenced the tree list created in 2018 for the streetscapes project.

Commissioner Lazorko shared that she spoke with Director Barber regarding the tree committee and Public Works’ involvement in tree maintenance. Director Barber indicated the committee is not currently active and that Public Works spends approximately 10% of its time on tree-related work primarily in the spring-with about 90% completed in-house and the remainder contracted out. Commissioner Lazorko expressed interest in revisiting the current tree list, including adding allergenic considerations, and questioned whether a formal ordinance is necessary, noting she appreciated the simplicity of the Willows ordinance. She also supported developing a written policy to guide the community, consistent with Director Barber’s preference for an educational approach.

Ms. Lozier stated she would like to meet with Director Barber to review the existing policy and tree list and explore incorporating elements from Willows into a draft policy.

Vice Chairperson Montague expressed support for a policy rather than an ordinance, emphasized the importance of heritage trees, and favored maintaining a recommended tree list.

Commissioner Rutledge agreed that an educational approach would provide guidance while preserving flexibility for residents.

Chairperson Nordbye also supported a simple policy approach and suggested inviting a representative from the UC office, along with Director Barber, to review the 2021 tree list and consider potential updates.

COMMISSIONERS REPORTS

- Commissioner Lazorko: Thanked Councilmember McDermott for speaking about the road conditions on East Street at the last City Council meeting, she stated she liked the road the way it was prior and was happy that something will be done about the pot holes on the road currently.
- Commissioner Rutledge: Nothing to report.
- Commissioner Louder: Nothing to report.
- Vice Chairperson Montague: Spoke about AB504 or 507 regarding commercial zoning.
- Chairperson Nordbye: Shared that the Wall that Heals will be in Orland the last week of March and that they are looking for volunteers and shared he will most likely miss the Planning Commission meeting that week.

ADJOURNMENT – 6:09 PM

Respectfully submitted,

Jennifer Schmitke, City Clerk

Stephen Nordbye, Chairperson



CITY OF ORLAND STAFF REPORT
SPECIAL MEETING DATE: April 9, 2026

TO: City of Orland Planning Commission

FROM: Lisa Lozier, AICP – City Planner

SUBJECT:

- 1. Request to Annex (Annex#2026-01)** recommendation to City Council on a proposal to annex approximately 37 acres of land (the project site) located in the unincorporated area of Glenn County
- 2. Prezone for Annexation (PR#2026-01)** The City’s pre zoning for APNs 045-240-002-000, 045-240-011, 045-240-010, and 045-240-013 to the “C-H” (*Highway Service Commercial*) zoning district

Environmental Review: The project has been determined to be *exempt* from further CEQA review pursuant to Section 15183 of the CEQA Guidelines. California Environmental Quality Act (CEQA) Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan for which an Environmental Impact Report (EIR) was certified.

SUMMARY:

The City of Orland entered into contract with De Novo Planning Group to prepare an Annexation Application and supporting CEQA documentation for submittal and approval by LAFCo. The information provided for the analysis and support of the proposed Annexation project is included from the documents prepared for the City of Orland by De Novo Planning Group:

Attachment B – West Orland Annexation Plan (Executive Summary)

Attachment C – Orland Annexation Project – Environmental Check List

ANALYSIS:

The City of Orland (City) proposes to annex approximately 37 acres of land identified as APNs 045-240-002-000, 045-240-011, 045-240-010, and 045-240-013 and located in an unincorporated area of Glenn County (County) within the southwestern portion of the City of Orland’s Sphere of Influence (SOI) and Planning Area (the “Project site”). The proposed Project (hereinafter referred to as the “Annexation Project”) consists solely of annexation of the Project site into the City of Orland and pre zoning of the site.

Approval of a site plan is not being requested by the applicant at this time, as all site plans and specific development proposals remain conceptual. No discretionary entitlements or specific development approvals are being requested as part of the Annexation Project beyond annexation and rezoning. For the purposes of this analysis, it is assumed that any future development application on the Project site would include commercial uses consistent with the City of Orland's intended rezoning designation of Highway Service Commercial (C-H).

Glenn County LAFCo will require the Project site to be rezoned by the City of Orland in conjunction with the proposed annexation. The City's rezoning for the Project site would be the Highway Service Commercial (C-H) zoning designation. Upon annexation into the City of Orland, the Highway Service Commercial (C-H) rezoning designation would become the formal zoning designation for the Project site.

Project Location

The project parcels are located just west of the existing city limits of the City of Orland. The site is within the City's Sphere of Influence (SOI), and is within the City's Planning Area. **Figure 1** (See Attachment C) shows the regional map, and **Figure 2** (See Attachment C) shows the vicinity map for the project.

Project Description

The proposed Project includes a request for annexation of approximately 37 acres located within the southwest portion of the City of Orland SOI and the City's Planning Area. Approval of a site plan is not being requested by the applicant at this time, as all site plans and specific development proposals are still conceptual. There are no entitlements or specific development approvals being requested beyond the annexation, and rezoning, which is described below.

For the purposes of this analysis, it is assumed that any future development application on the subject project site(s) would develop the project site with commercial uses, consistent with the intended rezoning of Highway Service Commercial (C-H).

The C-H zone is intended to provide necessary services and convenience for the traveling public along main roads or at highway intersection frontages at proper intervals and locations in developments designed for safety, convenience and suitable appearance.

Existing Site Uses

The project site currently contains agricultural land (pasture land), as well as some existing agricultural and residential buildings located in the northeastern portion of Project site. There are a small number of scattered trees located primarily within the northeastern portion of the Project site.

Surrounding Land Uses

The project site is located in a rural area that includes agricultural, commercial, light industrial, and rural residential uses. The surrounding area adjacent to the project site includes agricultural uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site.

General Plan and Zoning Designations

The City of Orland General Plan designates the project site as Commercial, Light Industrial/Commercial, and Low Density Residential land uses.

The Glenn County General Plan identifies the project site as Residential Estate One Acre (RE-1) and Highway and Visitor Commercial District (HVC), under the County zoning Code.

Approvals required for project implementation include rezoning the project site to the Highway Service Commercial (C-H), and annexation of the project site to the City. **Figure 3** shows the existing General Plan land use, and **Figure 4** shows the existing zoning.

Requested Entitlements and Other Approvals

The City of Orland is the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA (Guidelines Section 15050).

This document will be used by the City of Orland to take the following actions:

- Adoption of the CEQA Exemption (CEQA Guidelines Section 15183).
- Annexation of the project site, subject to review and approval by the Glenn County LAFCO.
- Rezoning of the project site to the Highway Service Commercial Zone.

The following agencies may be required to issue permits or approve certain aspects of the proposed project:

- North Coastal Regional Water Quality Control Board (NCRWQCB) - Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities.
- Glenn County Air Pollution Control District (APCD) - Approval of construction-related air quality permits.
- Glenn County Local Agency Formation Commission (LAFCO) – Review of the proposed annexation request.

ENVIRONMENTAL DETERMINATION:

The project has been determined to be *exempt* from further CEQA review pursuant to Section 15183 of the CEQA Guidelines. California Environmental Quality Act (CEQA) Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan for which an Environmental Impact Report (EIR) was certified.

RECOMMENDATION:

Based upon the information contained in this report and the West Orland Plan Executive Summary and after consideration of the attributes specific to the proposed site, staff is recommending that the Planning Commission recommend to the City Council approval of the intent to annex (ANNEX #2026-01) and prezone (PZ #2026-01) property identified as Glenn County Assessor’s parcel numbers APNs 045-240-002-000, 045-240-011, 045-240-010, and 045-240-013. Specifically, staff recommends that the following actions take place:

1. Orland Municipal Code Amendment(s): Move to approve Planning Commission Resolution PC 2026-___, recommending for approval to the City Council the intent to annex property into the City of Orland, and rezoning of that property, otherwise known

as APNs 045-240-002-000, 045-240-011, 045-240-010, and 045-240-013, to (C-H) Highway Service Commercial, based on the findings provided as Attachment A.

2. California Environmental Quality Act (CEQA): Staff is recommending that the Planning Commission approve the action (intent to annex, PZ 2026-01, and determine that the proposed action is exempt from further review pursuant to CEQA Guideline Section 15183 Exemptions.

ATTACHMENTS:

Attachment A – Planning Commission Resolution 2026-

Attachment B – West Orland Annexation Plan (Executive Summary)

Attachment C – West Orland Annexation Project - Environmental Check List



PLANNING COMMISSION RESOLUTION NO. PC 2026-XX

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF ORLAND, RECOMMENDING TO THE CITY COUNCIL TO INITIATE PROCEEDINGS TO ANNEX CERTAIN REAL PROPERTY CURRENTLY LOCATED WITHIN THE UNINCORPORATED TERRITORY OF GLENN COUNTY AND WITHIN THE CITY OF ORLAND PLANNING AREA AND SPHERE OF INFLUENCE AND IDENTIFIED AS GLENN COUNTY ASSESSOR'S PARCEL NUMBERS 045-240-002-000, 045-240-011, 045-240-010, 045-240-013 AND, FURTHER RECOMMENDING ADOPTION OF CITY OF ORLAND C-H, HIGHWAY SERVICE COMMERCIAL ZONE ON THE PARCELS APPLICATION NUMBER(S): ANNEX #2026-01, PZ #2026-01

WHEREAS, the City of Orland has initiated an annexation of territory into the City limits and an action to initiate proceedings pursuant to the Cortese-Knox Local Government Reorganization Act of 2000, commencing with Section 56000 of the California Government Code; and

WHEREAS, the boundaries of the territory to be annexed are described as Glenn County Assessor Parcel Numbers 045-240-002-000, 045-240-011, 045-240-010, and 045-240-013; and

WHEREAS, the City of Orland proposes to concurrently assign City of Orland zoning to the parcel via the rezoning process with the C-H, Highway Service Commercial zoning district; and

WHEREAS, the parcel is approximately 37 acres and bordered by property within the City on the south and east; and

WHEREAS, the rezoning of the property to C-H would create consistency between the existing and approved commercial developments to the north, south, east, and southwest; and

WHEREAS, the Orland City Council certifies that it consents to waiver of the conducting authority proceedings by the Local Agency Formation Commission (LAFCo) of Glenn County, pursuant to Section 56837 of the Government Code.

WHEREAS, the Planning Commission held a duly noticed public hearing to accept public comments and to review and consider the application on April 9th, 2026; and

WHEREAS, the Planning Commission deliberated on the proposed request and has determined that the request is consistent with the Orland General Plan and the requirements of Orland Zoning Code; and

WHEREAS, The project has been determined to be *exempt* from further CEQA review pursuant to Section 15183 of the CEQA Guidelines. California Environmental Quality Act (CEQA) Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan for which an Environmental Impact Report (EIR) was certified.

WHEREAS, the Planning Commission, in a staff report dated December 21, 2023, recommends to the City Council approving the following actions and making findings with respect to the following requests:

Prezoning:

1. The prezoning application generally meets the application and submittal requirements contained in Title 17 ZONING, Section 17.12.060; the property shall be prezoned prior to annexation. Prezoning will be accomplished in the same manner as zoning within the City.

2. The proposed prezoning to C-H (Highway Service Commercial) zoning district is consistent with the City of Orland General Plan and is within the City of Orland Sphere of Influence.

3. The proposed prezoning is compatible with the existing use of adjacent properties in the vicinity and with the City’s long-term, intended use of adjacent properties, as reflected in the General Plan Land Use Diagram.

4. The proposed prezoning to C-H (Highway Service Commercial) zoning district will not be detrimental to the public health, safety, or welfare of the City.

Initiation of Proceedings for Annexation:

1. The proposed annexation to the City of Orland of the territory described as Glenn County Assessor Parcel Numbers 045-240-002, 045-240-011, 045-240-010, and 045-240-013 is located within the same county as the City; the territory is contiguous to the City at the time of the initiation of the proposed annexation application; the territory is located within one County, Glenn, and is consisting of one (4) singular parcels of land, as required by Section 56741 of the California Government Code.

2. The proposed annexation would not result in unincorporated territory being completely surrounded by the City of Orland or by the City on one or more sides and the Pacific Ocean on the remaining sides.

3. The proposed annexation territory is not within a farmland security zone or subject to a Williamson Act contract (Sections 51296 and 56752 Ca. Govt. Code) that would require facilities or services.

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission of the City of Orland does hereby recommend to the Orland City Council approval of the rezoning and intent to annex of four (4) parcels (045-240-002, 045-240-011, 045-240-010, and 045-240-013). The foregoing Resolution was adopted by the Planning Commission on the 9th day of April 2026 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Stephan Nordbye, Chair

ATTEST:

Jennifer Schmitke, City Clerk

ENVIRONMENTAL CHECKLIST

FOR THE

ORLAND ANNEXATION PROJECT

FEBRUARY 2026

Prepared for:

City of Orland
815 Fourth Street
Orland, CA 95963

Prepared by:

De Novo Planning Group
1020 Suncoast Lane, Suite 106
El Dorado Hills, CA 95762
(916) 580-9818

D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm

ENVIRONMENTAL CHECKLIST
FOR THE
ORLAND ANNEXATION PROJECT

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INTRODUCTION

The following pages provide an analysis of the proposed Orland Annexation Project (project) with respect to the project's consistency with the City of Orland General Plan, the analysis contained in the Orland General Plan Environmental Impact Report (EIR), and any site-specific environmental impacts or cumulative impacts that may result from project implementation.

As explained in the following pages, the proposed project is consistent with the City's General Plan, for which an EIR was prepared and certified, and there are no site-specific or cumulative impacts associated with the proposed project that have not been fully addressed in a previous environmental document, or that cannot be mitigated to a less-than-significant level through the application of uniformly applied development policies and/or standards. The findings presented below demonstrate that no additional environmental analysis is required under the California Environmental Quality Act (CEQA) prior to approval of the proposed project.

PROJECT OVERVIEW

PROJECT LOCATION

The project parcels are located just west of the existing city limits of the City of Orland. The site is within the City's Sphere of Influence (SOI), and is within the City's Planning Area. **Figure 1** shows the regional map, and **Figure 2** shows the vicinity map for the project.

PROJECT DESCRIPTION

The proposed Project includes a request for annexation of approximately 37 acres located within the southwest portion of the City of Orland SOI and the City's Planning Area. Approval of a site plan is not being requested by the applicant at this time, as all site plans and specific development proposals are still conceptual. There are no entitlements or specific development approvals being requested beyond the annexation, and rezoning, which is described below.

For the purposes of this analysis, it is assumed that any future development application on the subject project site(s) would develop the project site with commercial uses, consistent with the intended rezoning of Highway Service Commercial (C-H).

The C-H zone is intended to provide necessary services and convenience for the traveling public along main roads or at highway intersection frontages at proper intervals and locations in developments designed for safety, convenience and suitable appearance.

EXISTING SITE USES

The project site currently contains agricultural land (pasture land), as well as some existing agricultural and residential buildings located in the northeastern portion of Project site. There are a small number of scattered trees located primarily within the northeastern portion of the Project site.

SURROUNDING LAND USES

The project site is located in a rural area that includes agricultural, commercial, light industrial, and rural residential uses. The surrounding area adjacent to the project site includes agricultural

uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site.

GENERAL PLAN AND ZONING DESIGNATIONS

The City of Orland General Plan designates the project site as Commercial, Light Industrial/Commercial, and Low Density Residential land uses.

The Glenn County General Plan identifies the project site as Residential Estate One Acre (RE-1) and Highway and Visitor Commercial District (HVC), under the County zoning Code.

Approvals required for project implementation include rezoning the project site to the Highway Service Commercial (C-H), and annexation of the project site to the City. **Figure 3** shows the existing General Plan land use, and **Figure 4** shows the existing zoning.

REQUESTED ENTITLEMENTS AND OTHER APPROVALS

The City of Orland is the Lead Agency for the proposed project, pursuant to the State Guidelines for Implementation of CEQA (Guidelines Section 15050).

This document will be used by the City of Orland to take the following actions:

- Adoption of the CEQA Exemption (CEQA Guidelines Section 15183).
- Annexation of the project site, subject to review and approval by the Glenn County LAFCO.
- Rezoning of the project site to the Highway Service Commercial Zone.

The following agencies may be required to issue permits or approve certain aspects of the proposed project:

- North Coastal Regional Water Quality Control Board (NCRWQCB) - Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities.
- Glenn County Air Pollution Control District (APCD) - Approval of construction-related air quality permits.
- Glenn County Local Agency Formation Commission (LAFCO) – Review of the proposed annexation request.

PREVIOUS ENVIRONMENTAL ANALYSES OF THE PROPOSED PROJECT

One previous environmental analysis has been prepared and certified which is applicable to the proposed project.

In October 2010, the City of Orland adopted a new General Plan and certified the associated General Plan EIR (State Clearinghouse (SCH) # 2008102073). The proposed project would be consistent with the General Plan designations of Commercial, Light Industrial/Commercial, and Low Density Residential land uses, as described above. The General Plan EIR assumed full development and buildout of the project site, consistent with the uses and development

standards proposed by the project. The cumulative impacts associated with buildout of the City of Orland General Plan, including the project site, were fully addressed in the General Plan EIR.

CEQA GUIDELINES SECTION 15183 EXEMPTIONS

CEQA Guidelines Section 15183 allows a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified. As noted above, the proposed project is consistent with the land use designation and densities established by the Orland General Plan, for which an EIR was certified. The provisions contained in Section 15183 of the CEQA Guidelines are presented below.

15183. Projects Consistent with a Community Plan or Zoning

(a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

(b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- (1) Are peculiar to the project or the parcel on which the project would be located,*
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,*
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action,*
or
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

(c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

(d) This section shall apply only to projects which meet the following conditions:

(1) The project is consistent with:

- (A) A community plan adopted as part of a general plan,*
- (B) A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or*
- (C) A general plan of a local agency, and*

(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

(e) This section shall limit the analysis of only those significant environmental effects for which:

(1) Each public agency with authority to mitigate any of the significant effects on the environment identified in the planning or zoning action undertakes or requires others to undertake mitigation measures specified in the EIR which the lead agency found to be feasible, and

(2) The lead agency makes a finding at a public hearing as to whether the feasible mitigation measures will be undertaken.

(f) An effect of a project on the environment shall not be considered peculiar to the project or the parcel for the purposes of this section if uniformly applied development policies or standards have been previously adopted by the City or county with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence which need not include an EIR. Such development policies or standards need not apply throughout the entire City or county, but can apply only within the zoning district in which the project is located, or within the area subject to the community plan on which the lead agency is relying. Moreover, such policies or standards need not be part of the general plan or any community plan, but can be found within another pertinent planning document such as a zoning ordinance. Where a City or county, in previously adopting uniformly applied development policies or standards for imposition on future projects, failed to make a finding as to whether such policies or standards would substantially mitigate the effects of future projects, the decision-making body of the City or county, prior to approving such a future project pursuant to this section, may hold a public hearing for the purpose of considering whether, as applied to the project, such standards or policies would substantially mitigate the effects of the project. Such a public hearing need only be held if the City or county decides to apply the standards or policies as permitted in this section.

(g) Examples of uniformly applied development policies or standards include, but are not limited to:

(1) Parking ordinances.

(2) Public access requirements.

(3) Grading ordinances.

(4) Hillside development ordinances.

(5) Flood plain ordinances.

(6) Habitat protection or conservation ordinances.

(7) View protection ordinances.

(8) Requirements for reducing greenhouse gas emissions, as set forth in adopted land use plans, policies, or regulations.

(h) An environmental effect shall not be considered peculiar to the project or parcel solely because no uniformly applied development policy or standard is applicable to it.

(i) Where the prior EIR relied upon by the lead agency was prepared for a general plan or community plan that meets the requirements of this section, any rezoning action consistent with the general plan or community plan shall be treated as a project subject to this section.

(1) “Community plan” is defined as a part of the general plan of a City or county which applies to a defined geographic portion of the total area included in the general plan, includes or references each of the mandatory elements specified in Section 65302 of the Government Code, and contains specific development policies and implementation measures which will apply those policies to each involved parcel.

(2) For purposes of this section, “consistent” means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan.

(j) This section does not affect any requirement to analyze potentially significant offsite or cumulative impacts if those impacts were not adequately discussed in the prior EIR. If a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that offsite or cumulative impact.

PROJECT-SPECIFIC ENVIRONMENTAL REVIEW

The attached Environmental Checklist includes a discussion and analysis of any peculiar or site-specific environmental impacts associated with construction and operation of the proposed project. The Environmental Checklist identifies the applicable City of Orland development standards and policies that would apply to the proposed project during both the construction and operational phases, and explains how the application of these uniformly applied standards and policies would ensure that no peculiar or site-specific environmental impacts would occur.

CONCLUSION

As described above, the proposed Orland Annexation (project) is consistent with the land use designations and development intensities assigned to the project site by the City of Orland General Plan. Cumulative impacts associated with development and buildout of the project site, as proposed, were fully addressed in the City of Orland General Plan EIR (SCH# 2008102073). Since the proposed project is consistent with the land use designation and development intensity for the site identified in the General Plan and analyzed in the General Plan EIR, implementation of the proposed project would not result in any new or altered cumulative impacts beyond those addressed in the General Plan EIR.

The analysis in the attached CEQA Environmental Checklist demonstrates that there are no site-specific or peculiar impacts associated with the project, and identifies uniformly applied standards and policies that would be applied to the project. The Project Requirements identified in the attached environmental analysis include requirements that must be implemented by the proposed project in order to ensure that any site-specific impacts or construction-related

impacts are reduced to a less than significant level. All Project Requirements identified in the attached Environmental Checklist shall be made a condition of project approval and shall be implemented within the timeframes identified.



WEST ORLAND ANNEXATION

Legend

-  Project Location
-  Incorporated Area
-  County Boundary

Figure 1. Regional Map

Sources: California State Geoportail; USGS Transportation Dataset. Map Date: January 4, 2026.

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WEST ORLAND ANNEXATION

- Legend**
- West Orland Annexation Area
 - City of Orland
 - Orland Sphere of Influence

Figure 2. Vicinity Map

Sources: California State Geoportail; USGS Transportation Dataset; Vivid Imagery 7/19/2023. Map Date: January 4, 2026.

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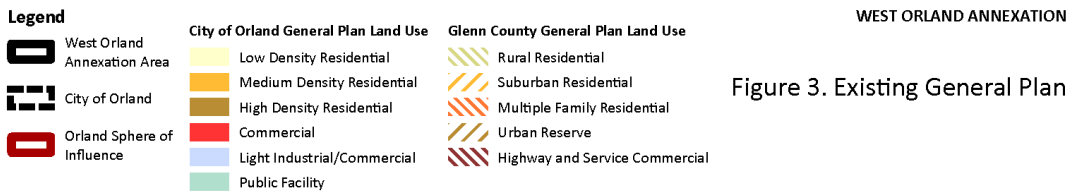
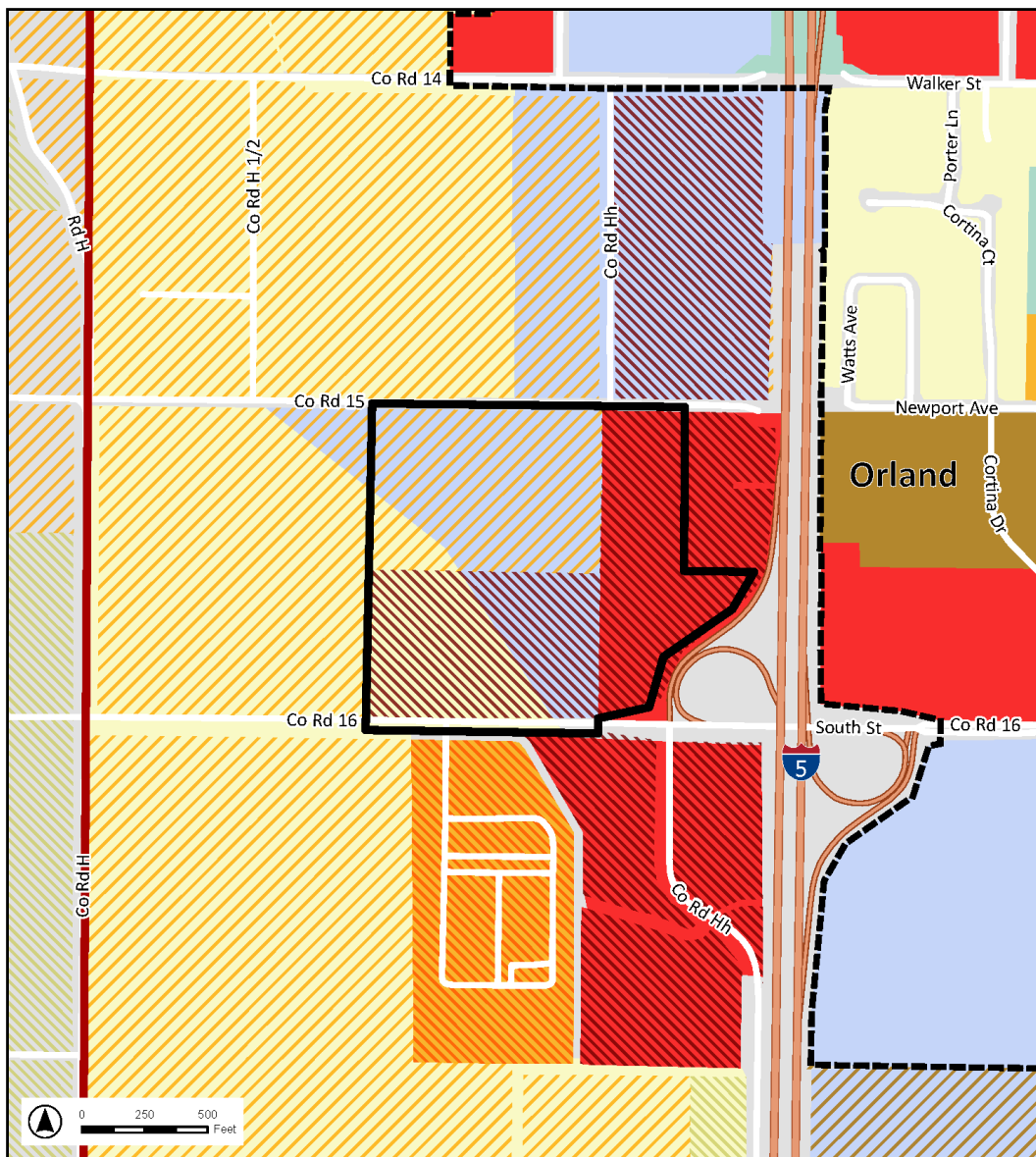
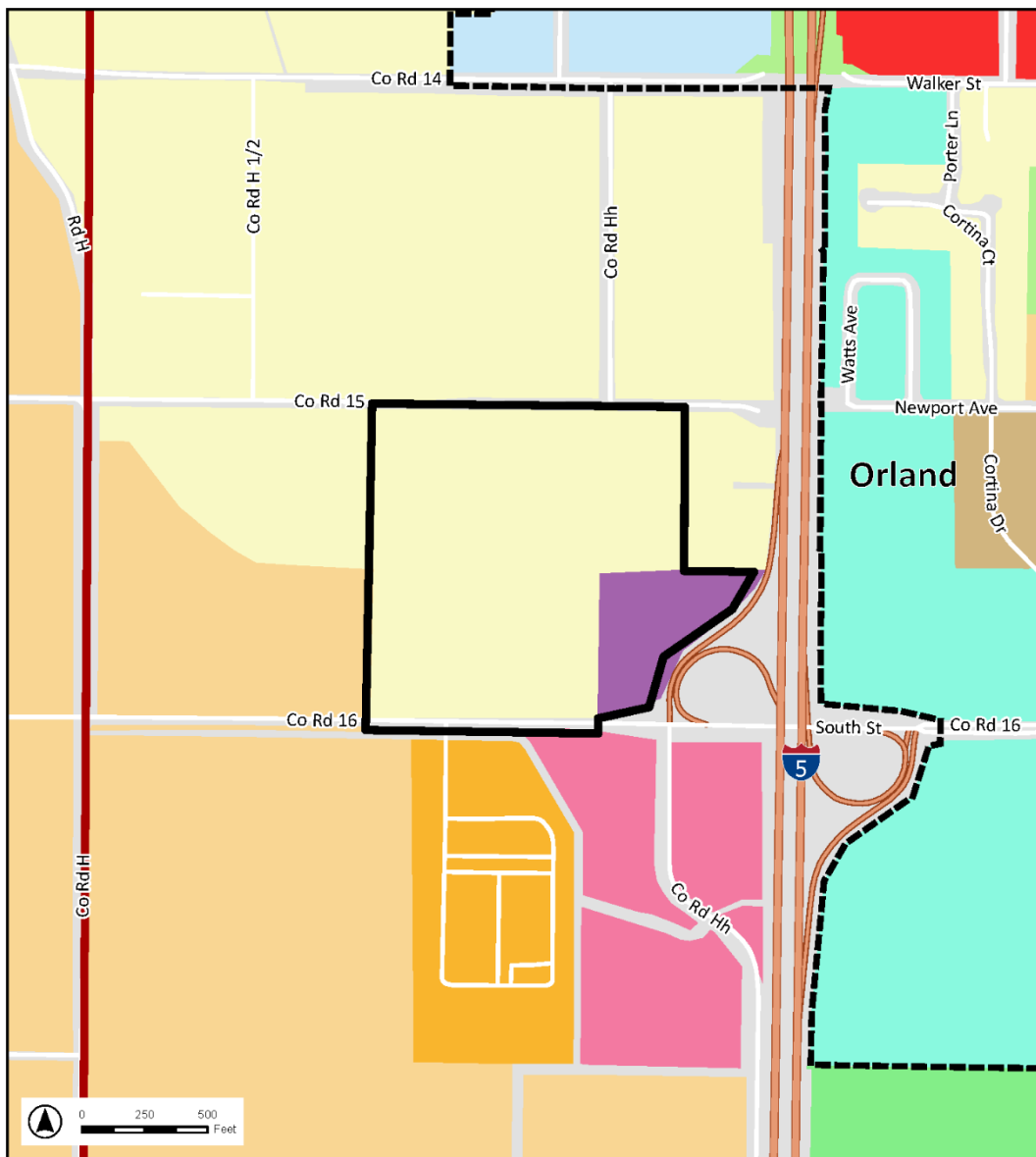


Figure 3. Existing General Plan

Sources: California State Geoportal; USGS Transportation Dataset; Glenn County General Plan; City of Orland General Plan. Map Date: January 4, 2026.

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Legend

	West Orland Annexation Area		RE-1		R-1
	City of Orland		RE-5		R-2
	Orland Sphere of Influence		R-M		R-3
			AE-20		C-2
			HVC		M-L
			SC		P-D
					P-F

WEST ORLAND ANNEXATION

Figure 4. Existing Zoning

Sources: California State Geoportal; USGS Transportation Dataset; Glenn County Zoning Map; City of Orland Zoning Map. Map Date: January 4, 2026.

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ENVIRONMENTAL CHECKLIST

I. AESTHETICS -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. There are no scenic vistas located on or adjacent to the project site. Noteworthy scenic vistas that can be seen from the City of Orland include Mount Lassen and the Cascade and Sierra mountains and foothills and the Coastal Range. However, it these scenic vistas are views of distant scenic resources and a building of 35 or 45 feet in height would not necessarily block these views.

Commercial uses are subject to the height restrictions and design standards, as designated by the Orland Zoning Code.

The proposed project uses are consistent and compatible with the surrounding land use designations. The project site is located in a commercial, light industrial, and rural residential area. As stated in the City of Orland General Plan EIR, since most travelers pass through the City on highways such as I-5, the City considers facilitating well-designed development along this corridor as key to establishing a desirable community image.

The project site is located in a relatively rural area that is surrounded by agricultural, commercial, light industrial, and rural residential uses. The surrounding area adjacent to the project site includes agricultural uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site.

Implementation of the proposed project would allow for additional commercial development on a project site that is bordered by similarly scaled uses, as described above. The project site is not topographically elevated from the surrounding lands and is not highly visible from areas beyond the immediate vicinity of the site. There are no prominent features on the site, such as visually distinct trees, rock outcroppings, or other visually distinctive features that contribute to the scenic quality of the site. The project site is not designated as a scenic vista by the City of Orland General Plan.

Implementation of the proposed project would not significantly change the existing visual character of the project area, since much of the areas within and immediately adjacent to the site are used for commercial and other similar purposes.

Implementation of the proposed project would allow for further commercial development to the project area that would be generally consistent with the surrounding land uses. The proposed project would not have a substantial effect on a scenic vista. Therefore, this impact is considered **less than significant**.

Response b): Less than Significant. As described in the Orland General Plan EIR, there are no Officially Dedicated California Scenic Highway segments in the Orland Planning Area. Development of the proposed project, there would not result in the removal of any substantial trees, rock outcroppings, or buildings of historical significance, and would not result in changes to any of the viewsheds from the designated scenic highways in the vicinity of the City of Orland. Therefore, there is a **less than significant impact**.

Response c): Less than Significant. As described under Response a), above, the proposed project would add additional commercial land uses to an area that currently contains numerous commercial, light industrial, agricultural, and rural residential land uses near to the Project site. The proposed project would be visually compatible with the surrounding land uses and would not significantly degrade the existing visual quality of the site or the surrounding area. Additionally, the project will comply with City standards. Overall, the exterior facades of the anticipated structures, streetscape improvements, and exterior lighting improvements would be compatible with the surrounding land uses. This is a **less than significant impact**.

Response d): Less than Significant. Daytime glare can occur when the sunlight strikes reflective surfaces such as windows, vehicle windshields and shiny reflective building materials. The proposed project would introduce new commercial land uses into the project site; however, reflective building materials are not anticipated for use in the project, and as such, the project is not anticipated to result in increases in daytime glare. Further, if reflective building materials are used, they would be limited to glass materials for buildings, which would not generate substantial glare.

The proposed project would include exterior lighting around the structures, and also potentially within any future landscaped areas within the site. Allowed uses would be consistent with the applicable height restrictions and design standards, as designated by the Orland Zoning Code. The City's Zoning Ordinance requires commercial and industrial exterior lighting to be designed

to reflect away from adjacent residential uses or to the ground within the site property (Sections 17.36.060(D)(2), 17.40.060(C)(2), 17.44.050(D)(2), 17.48.050(D)(20), and 17.52.060(D)(2)). Therefore, this is a **less than significant impact**.

II. AGRICULTURE AND FOREST RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

RESPONSES TO CHECKLIST QUESTIONS

Response a): No Impact. The project site is underlain entirely by Arbuckle gravelly loam, Cortina very gravelly sandy loam, and Tehama loam soils.¹ Some of these soils are considered Prime Farmland soil, Farmland of Statewide Importance, and Farmland of Local Importance.

The project site currently consists primarily of agricultural land. The proposed project is identified primarily for commercial uses in the Orland General Plan, and the project is consistent with the uses established by the General Plan. Development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR. As such, implementation of the proposed project would have **no impact** related to this environmental topic.

Response b): No Impact. The project site is not under William Act contract. Nevertheless, the project site and some of the parcels immediately adjacent to the project site are designated for agricultural uses. However, development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR.

¹ See: <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR. As such, implementation of the proposed project would have **no impact** related to this environmental topic.

Responses c) and d): No Impact. The project site is located in an area consisting of primarily existing agricultural uses. There are no forest resources on the project site or in the immediate vicinity of the project site. Therefore, there is **no impact**.

Response e): No Impact. As described under Responses (a) and (b) above, development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR. As such, implementation of the proposed project would have **no impact** related to this environmental topic.

III. AIR QUALITY -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

EXISTING SETTING

The project site is located within the boundaries of the Glenn County Air Pollution Control District (APCD). This agency is responsible for monitoring air pollution levels and ensuring compliance with federal and state air quality regulations within Glenn County and has jurisdiction over most air quality matters within its borders.

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. Air quality emissions would be generated during construction of the proposed project and during operation of the proposed project. Operational emissions would come primarily from vehicle emissions from vehicle trips generated by the proposed project, as well as energy consumption and area sources.

Criteria Pollutant Emissions

Construction would result in numerous activities that would generate dust. The fine, silty soils in the project area and often strong afternoon winds exacerbate the potential for dust, particularly in the summer months. Grading, leveling, earthmoving and excavation are the activities that generate the most particulate emissions. Impacts would be localized and variable. The initial phase of project construction would involve grading and leveling the project site and installation of supporting underground infrastructure, such as water, sewer, storm drain, and electrical lines.

Operational activities would also generate criteria pollutant emissions, primarily associated with mobile vehicles, energy consumption, and area sources. Development of the site for urban uses and the corresponding criteria pollutant emissions that would be associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

Response c): Less than Significant. Sensitive receptors are those parts of the population that can be severely impacted by air pollution. Sensitive receptors include children, the elderly, and the infirm. The nearest sensitive receptors to the project site are the residences located adjacent to the project site to the north and south.

Development of the site for urban uses and the corresponding potential to expose sensitive receptors to substantial pollutant concentrations that would be associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

Response d): Less than Significant. Operation of the proposed project would not generate notable odors. The commercial uses included in the proposed project would be compatible with the surrounding land uses. People in the immediate vicinity of construction activities may be subject to temporary odors typically associated with construction activities (diesel exhaust, hot asphalt, etc.). However, any odors generated by construction activities would be minor and would be short and temporary in duration.

Examples of facilities that are known producers of operational odors include: Wastewater Treatment Facilities, Chemical Manufacturing, Sanitary Landfill, Fiberglass Manufacturing, Transfer Station, Painting/Coating Operations (e.g., auto body shops), Composting Facility, Food Processing Facility, Petroleum Refinery, Feed Lot/Dairy, Asphalt Batch Plant, and Rendering Plant. If a project would locate receptors and known odor sources in proximity to each other further analysis may be warranted; however, if a project would not locate receptors and known odor sources in proximity to each other, then further analysis is not warranted. The project does not propose sensitive receptors that could be exposed to odors in the vicinity. Should any of the commercial uses generate odors during construction, the odors would be contained within the

building envelope(s) and proper ventilation would be provided. This is a **less-than-significant impact**.

IV. BIOLOGICAL RESOURCES -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant.

As described in the General Plan EIR, land use and development consistent with the proposed General Plan, including within the project site, could result in adverse impacts on special-status species or essential habitat for special-status species.

Impacts to special-status species occur for a number of reasons, though primarily through increased utilization of a landscape by humans for travel (i.e., roadways), agricultural, residential, commercial, or industrial purposes, resulting in habitat fragmentation, encroachment by exotic weeds and area-wide changes in surface water flows due to development of previously undeveloped areas. Any development within areas that are currently undeveloped could result in impacts to habitat resources that may support special-status species. Construction within the project could result in direct take of habitat and loss of individuals of these species.

Where there are direct impacts to special-status species, indirect impacts could occur as well. Indirect impacts include increased human/wildlife interactions and loss resulting from encroachment by exotic weeds.

Development of the site for urban uses and the corresponding potential to have a substantial effect on any candidate, sensitive, or special status species that would be associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

Response b): No Impact. Riparian natural communities support woody vegetation found along rivers, creeks and streams. Riparian habitat can range from a dense thicket of shrubs to a closed canopy of large mature trees covered by vines. Riparian systems are considered one of the most important natural resources. While small in total area when compared to the state's size, they provide a special value for wildlife habitat.

Over 135 California bird species either completely depend upon riparian habitats or use them preferentially at some stage of their life history. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians depend on riparian habitat. Riparian habitat also provides riverbank protection, erosion control and improved water quality, as well as numerous recreational and aesthetic values.

There is no riparian habitat or other sensitive natural communities located on the project site. As such, the proposed project would have **no impact** on these resources, and no mitigation is required.

Response c): No Impact A wetland is an area that is inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Wetlands are defined by regulatory agencies as having special vegetation, soil, and hydrology characteristics. Hydrology, or water inundation, is a catalyst for the formation of wetlands. Frequent inundation and low oxygen causes chemical changes to the soil properties resulting in what is known as hydric soils. The prevalent vegetation in wetland communities consists of hydrophytic plants, which are adapted to areas that are frequently inundated with water.

Hydrophytic plant species have the ability to grow, effectively compete, reproduce, and persist in low oxygen soil conditions.

There are no wetlands located on the project site. As such, the proposed project would have **no impact** on this environmental topic, and no mitigation is required.

Response d): Less than Significant. There are no documented wildlife corridors or wildlife nursery sites on or adjacent to the project site. Implementation of the proposed project would have a **less-than-significant impact**.

Responses e), f): Less than Significant. No habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) occur within the City of Orland. Development of the project site would not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan. Therefore, this is a **less-than-significant impact**.

V. CULTURAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to '15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a), b), c): Less than Significant. The City of Orland General Plan and EIR do not identify the project site as having prehistoric period, or cultural resources. Additionally, there are no known unique cultural, historical, paleontological or archeological resources known to occur on, or within the immediate vicinity of the project site.

Because the site has been previously disturbed by preexisting agricultural operations, it is not anticipated that site grading and preparation activities would result in impacts to cultural, historical, archaeological or paleontological resources. There are no known human remains located on the project site, nor is there evidence to suggest that human remains may be present on the project site. However, as with most projects in California that involve ground-disturbing activities, there is the potential for discovery of a previously unknown cultural and historical resource or human remains.

The implementation of Project Requirement 1 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this requirement would reduce this impact to a **less than significant** level.

Project Requirement(s)

Project Requirement 1: *If any prehistoric or historic artifacts, human remains or other indications of archaeological resources are found during grading and construction activities, an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, shall be consulted to evaluate the finds and recommend appropriate mitigation measures.*

- *If cultural resources or Native American resources are identified, every effort shall be made to avoid significant cultural resources, with preservation an important goal. If significant sites cannot feasibly be avoided, appropriate mitigation measures, such as data recovery excavations or photographic documentation of buildings, shall be undertaken consistent with applicable state and federal regulations.*

- *If human remains are discovered, all work shall be halted immediately within 50 meters (165 feet) of the discovery, the County Coroner must be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.*
- *If any fossils are encountered, there shall be no further disturbance of the area surrounding this find until the materials have been evaluated by a qualified paleontologist, and appropriate treatment measures have been identified.*

VI. ENERGY

<i>Would the project:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a-b): Less than Significant. Appendix G of the State CEQA Guidelines requires consideration of the potentially significant energy implications of a Project. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usage (Public Resources Code Section 21100, subdivision [b][3]). According to Appendix G of the CEQA Guidelines, the means to achieve the goal of conserving energy include decreasing overall energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. In particular, the proposed project would be considered “wasteful, inefficient, and unnecessary” if it were to violate state and federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy inefficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an inconsistency with applicable plan, policy, or regulation.

The amount of energy used at the project site would directly correlate to the energy consumption (including fuel) used by vehicle trips generated during project construction, fuel used by off-road construction vehicles during construction, fuel used by vehicles during project operation, and electricity usage during project operation.

The proposed project would comply with all existing energy standards, including those established by the City of Orland and Glenn County. For example, buildings developed as part of the proposed project would be required to comply with the latest version of the California Building Energy Efficiency Standards (Title 24), which require a high degree of energy efficiency for new buildings. Additionally, the project would be required to comply with other statewide measures, including those intended to improve the energy efficiency of the statewide passenger and heavy-duty truck vehicle fleet (e.g., the Pavley Bill and the Low Carbon Fuel Standard), which improve vehicle fuel economies, thereby conserving gasoline and diesel fuel for any trips that would be generated by the project. These energy savings would continue to accrue over time.

Overall, the proposed project would not violate any state or federal energy standards and/or result in significant adverse impacts related to project energy requirements, energy efficiencies, energy intensiveness of materials, cause significant impacts on local and regional energy supplies or generate requirements for additional capacity, fail to comply with existing energy standards, otherwise result in significant adverse impacts on energy resources, or conflict or create an

inconsistency with applicable plan, policy, or regulation. Therefore, the proposed project would not be expected cause an inefficient, wasteful, or unnecessary use of energy resources nor cause a significant impact on any of the threshold as described by Appendix G of the CEQA Guidelines. This is a **less-than-significant impact**.

VII. GEOLOGY AND SOILS -- WOULD THE PROJECT:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a.i), a.ii): Less than Significant. The project site, as with virtually all sites within the State of California, is subject to minor ground shaking and potential secondary hazards (i.e., liquefaction and subsidence) as a result of earthquakes. The primary seismic hazard associated with the project site is minor ground shaking, which can result in partial collapse of buildings and extensive damage in poorly built or substandard structures. The project site is not located within an Alquist-Priolo earthquake hazard zone. The closest active fault system is the 40-mile-long Willows fault, located about 10 miles west of the City. As such, future seismic events associated

with this fault system are not anticipated to adversely affect the project site, and ground rupture due to faulting is considered to be unlikely.

Based upon the seismologic and geologic conditions within the project site, significant damage or risk due to earthquake activity is relatively unlikely. The City adopted the 2001 California Code of Regulations, Title 24, also known as the California Building Standards Code or California Building Code. Implementation of these regulations throughout development is designed to prevent significant damage from ground shaking during seismic events resulting from movement on any of the faults or fault systems.

Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead-and-live loads. The code-prescribed lateral forces are generally considered to be substantially smaller than the comparable forces that would be associated with a major earthquake. Therefore, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse but with some structural as well as nonstructural damage.

Building new structures for human use would increase the number of people exposed to local and regional seismic hazards. Seismic hazards are a significant risk for most property in California.

The Safety Element of the Orland General Plan includes several goals, objectives and policies to reduce the risks to the community from earthquakes and other geologic hazards. The Safety Element contains a policies, such as Policy 4.6.A and Program 4.6.A.1, that require the City to consider the potential for expansive soils and earthquake-related hazards when reviewing applications for development projects. In most cases the City may require a soils report in order to evaluate shrink-swell and liquefaction potential of proposed project sites and implement measures to minimize unstable soil hazards. General Plan Program 4.6.A.2 requires that public buildings and areas designed for assembly within the Planning Area are constructed to meet seismic safety standards. Program 4.6.A.3 and Program 4.6.A.4 provide assistance to owners of existing buildings making structural improvements to meet seismic standards.

The City reviews all proposed development projects for consistency with the General Plan policies and California Building Code provisions identified above. This review occurs throughout the project application review and processing stage, and throughout plan check and building inspection phases prior to the issuance of a certificate of occupancy.

Consistency with the requirements of the California Building Code and the Orland General Plan policies identified above would ensure that impacts on humans associated with seismic hazards would be **less than significant**.

Responses a.iii): Less than Significant. Liquefaction normally occurs when sites underlain by saturated, loose to medium dense, granular soils are subjected to relatively high ground shaking. During an earthquake, ground shaking may cause certain types of soil deposits to lose shear strength, resulting in ground settlement, oscillation, loss of bearing capacity, landsliding, and the

buoyant rise of buried structures. The majority of liquefaction hazards are associated with sandy soils, some silty soils of low plasticity, and some gravelly soils. Cohesive soils are generally not considered to be susceptible to liquefaction. In general, liquefaction hazards are most severe within the upper 50 feet of the surface, except where slope faces or deep foundations are present. Soils that underlay the project site consist of predominantly clay soil particle sizes. Clay-type soils are generally not subject to liquefaction.

As identified in the Orland General Plan EIR, the majority of the Orland Planning Area, including the project site is at low risk for liquefaction. Prior to development of the project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities. Adherence to the engineering requirements contained in the subsurface geotechnical report would ensure that this impact is **less than significant**.

Project Requirement(s)

Project Requirement 2: *Prior to development of the project site, a subsurface geotechnical investigation must be performed to identify onsite soil conditions and identify any site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities.*

Responses a.iv): Less than Significant. The project site is relatively flat and there are no major slopes in the vicinity of the project site. As such, the project site is exposed to little or no risk associated with landslides. This is a **less-than-significant impact**.

Response b): Less than Significant. During the construction preparation process, exposed surfaces could be susceptible to erosion from wind and water. Effects from erosion include impacts on water quality and air quality. Exposed soils that are not properly contained or capped increase the potential for increased airborne dust and increased discharge of sediment and other pollutants into nearby stormwater drainage facilities. Risks associated with erosive surface soils can be reduced by using appropriate controls during construction and properly re-vegetating exposed areas. Project Requirement 3 (Hydrology and Water Quality) would require the implementation of various best management practices (BMPs) and a SWPPP that would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction activities. The implementation of these requirements would ensure impacts are **less than significant**.

Responses c), d): Less than Significant. The project site has a low to high potential for expansive soils, as described in the Orland General Plan EIR. A soil's potential to shrink and swell depends on the amount and types of clay in the soil. Certain clays expand when wet and disproportionately shrink when dry. Soils with moderate to high shrink/swell potential tend to expand during wet seasons and shrink during dry seasons. In addition, soils with moderate to high shrink-swell potential generally have low plasticity levels which affect the expansion potential of soils. The clayey soils within the project site contain layers of highly expansive soils dispersed throughout the area, which could pose development constraints. Highly expansive soils

can cause structural damage to foundations and roads and are less suitable for development than non-expansive soils.

According to the Glenn County General Plan, the project site has a relatively high potential for expansive soils. Detailed geologic investigations may be necessary for areas with moderate to high shrink-swell potential. Development on expansive soils requires special grading and construction techniques.

As previously noted, the City has adopted the California Building Code. The California Building Code includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soil-related impacts. In addition, for subdivision projects requiring a final map, the Subdivision Map Act requires a preliminary soils report. Furthermore, Project Requirement 2 requires a subsurface geotechnical investigation to be performed to identify onsite soil conditions, and identification of site-specific engineering measures to be implemented during the construction of building foundations and subsurface utilities.

To reduce the potential for post-construction distress to the proposed structures resulting from swelling and shrinkage of these materials, a geotechnical evaluation is required by Project Requirement 2 in order to reduce the potential for damaging differential settlement of overlying improvements. Additionally, the California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2 requires specific geotechnical evaluation when a preliminary geotechnical evaluation determines that expansive or other special soil conditions are present, which, if not corrected, would lead to structural defects. As such, this is a **less-than-significant impact**.

Response e): No Impact. The project site would be served by public wastewater facilities and does not require an alternative wastewater system such as septic tanks. Implementation of the proposed project would have **no impact** on this environmental issue.

Response f): Less than Significant. The project site is located in an area with the potential to contain paleontological resources. The implementation of Project Requirement 1 would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including paleontological resources. As such, this is a **less-than-significant impact**.

XIII. GREENHOUSE GAS EMISSIONS – WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?			X	

BACKGROUND DISCUSSION

Various gases in the Earth’s atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth’s surface temperature. Solar radiation enters Earth’s atmosphere from space, and a portion of the radiation is absorbed by the Earth’s surface. The Earth emits this radiation back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation.

Naturally occurring GHGs include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also GHGs, but they are, for the most part, solely a product of industrial activities. Although the direct GHGs CO₂, CH₄, and N₂O occur naturally in the atmosphere, human activities have changed their atmospheric concentrations. From the pre-industrial era (i.e., ending about 1750) to 2019, concentrations of these three GHGs have increased globally by 47, 156, and 23 percent, respectively (IPCC, 2023).

Greenhouse gases, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation that otherwise would have escaped back into space is now retained, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor, nitrous oxide (N₂O), and chlorofluorocarbons (CFCs).

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Consumption of fossil fuels in the transportation sector was the single largest source of California’s GHG emissions in 2024, accounting for 39% of total GHG emissions in the state. This category was followed by the industrial sector (23%), the electricity generation sector (including both in-state and out-of-state sources) (16%) and the agriculture and forestry sector (8%).²

² California Energy Commission. 2026. California Greenhouse Gas Emission Inventory – 2025 Edition. Available at: <https://ww2.arb.ca.gov/ghg-inventory-data>

As the name implies, global climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern, respectively. California produced approximately 371 million gross metric tons of carbon dioxide equivalents (MMTCO_{2e}) in 2022.³ Given that worldwide emissions from human activities totaled approximately 53 billion gross metric tons of carbon dioxide equivalents (BMTCO_{2e}) in 2024, California's incremental contribution to global GHGs is approximately 2%.⁴

Carbon dioxide equivalents are a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted.

RESPONSES TO CHECKLIST QUESTIONS

Response a), b): Less than Significant. Development of the site for urban uses and the corresponding generation of GHG emissions associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR.

On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts. Overall, the project would result in **less-than-significant** impact relative to this environmental topic.

³ California Energy Commission. 2026. California Greenhouse Gas Emission Inventory – 2025 Edition. Available at: <https://ww2.arb.ca.gov/ghg-inventory-data>

⁴ European Commission. 2025. World emissions hit record high, but the EU leads trend reversal. September 9, 2025. Available at: https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/world-emissions-hit-record-high-eu-leads-trend-reversal-2025-09-09_en

IX. HAZARDS AND HAZARDOUS MATERIALS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed project would place new commercial uses in an area of the City that currently contains predominantly agricultural, commercial, light industrial, and rural residential uses. The proposed commercial land uses would not routinely transport, use, or dispose of hazardous materials, or present a reasonably foreseeable release of hazardous materials, with the exception of common residential grade hazardous materials such as household cleaners, paint, etc. The operational phase of the proposed project would not pose a significant hazard to the public or the environment.

As stated in the City’s General Plan and General Plan EIR, all uses that handle potentially hazardous materials are required, prior to issuance of a building permit or license, to obtain approval of a hazardous material permit from the County Environmental Health Department. The hazardous material permit requires the applicant to list all hazardous materials used or

generated in the operation of their business. Their plan to store, handle, or release these hazardous materials must receive the approval of the County Environmental Health Department. The business is monitored by the Environmental Health Department on a regular basis to determine compliance with the hazardous material permit approved by the department.

Any operations that involve the use of hazardous materials would be required to have the hazardous material transported, stored, used, and disposed of in compliance with local, state, and federal regulations. The Glenn County Air Pollution Control District is the Certified Unified Program Agencies (CUPA) for Glenn County and is responsible for the implementation of statewide programs within the city including Hazardous Materials Business Plan (HMBP) requirements, among numerous other programs. Additionally, businesses are regulated by Cal/Occupational Safety and Health Administration (OSHA) and are therefore required to ensure employee safety. Specific requirements include identifying hazardous materials in the workplace, providing safety information to workers that handle hazardous materials, and adequately training workers. To further ensure the safety of employees, and reduce the potential for accidental release of hazardous materials into the environment, the applicant must submit a HMBP to the APCD for review and approval prior to bringing hazardous materials onsite.

Construction equipment and materials would likely require the use of petroleum-based products (oil, gasoline, diesel fuel), and a variety of common chemicals including paints, cleaners, and solvents. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials. In addition, Project Requirement 3 (Hydrology and Water Quality) requires the project applicant to implement a SWPPP during construction activities, which would prevent any contaminated runoff from leaving the project site. Therefore, compliance with applicable federal, state, local statutes and regulations, and the SWPPP provided in Project Requirement 3, the proposed project would have a **less-than-significant impact** relative to this issue.

Response c): Less than Significant. The project site is not located within 1/4-mile of an existing school. The nearest school to the project site is the C.K. Price Middle School, located approximately 0.7 miles east of the project site. Therefore, this is a **less-than-significant impact**.

Response d): Less than Significant. According the California Department of Toxic Substances Control (DTSC), there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or adjacent to the project site. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5.

The nearest site to the proposed project is located approximately 0.7 miles northeast of the project site. Information relating to this site is provided below:

VERESCHAGIN OIL COMPANY (11510007)

- Cleanup Status: REFER: RWQCB AS OF 12/30/2008
- Site Type: Evaluation

- National Priorities List: No
- Cleanup Oversight Agency:
 - None Specified

Additionally, there are no Federal Superfund Sites, State Response Sites, or Voluntary Cleanup Sites on, or adjacent to the project site. The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5. Therefore, implementation of the proposed project would result in a **less-than-significant impact** relative to this environmental topic.

Response e): Less than Significant. The Federal Aviation Administration (FAA) establishes distances of ground clearance for take-off and landing safety based on such items as the type of aircraft using the airport.

The Orland Airport (Orland-Haigh Field) is the closest airport to the project site, located approximately 3 miles to the southeast. The Airport is owned by Glenn County. The airport is not located within two miles of the project site, nor is the project site located within an airport land use plan. Therefore, implementation of the proposed project would result in a **less-than-significant impact** relative to this environmental topic.

Response f): No Impact. The General Plan includes policies that require the City to maintain emergency access routes that are free of traffic impediments (Policy 4.1.B, Program 4.1.B.1, Program 4.1.B.2). The proposed project does not include any actions that would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project involves the development of commercial land uses within an urbanized environment and would not interfere with any emergency response or evacuation plans. Implementation of the proposed project would result in **no impact** on this environmental topic.

Response g): Less than Significant. The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

The project site is not located within a designated wildfire hazard area.⁵ Since the project site is not located within a designated wildfire hazard area, this is a **less-than-significant impact**.

⁵ <https://www.glenncountyrcd.org/files/9a9d8cabb/Map+B.pdf>

X. HYDROLOGY AND WATER QUALITY -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:			X	
(i) result in substantial erosion or siltation on- or off-site;			X	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to provide substantial additional sources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. Construction associated the project would consist of grading and vegetation removal activities that would increase soil erosion rates. These activities would result in the exposure of raw soil materials to the natural elements (wind, rain, etc.). In rainy periods, grading operations may impact the surface runoff by increasing the amount of silt and debris carried by runoff. Areas with uncontrolled concentrated flow would experience loss of material within the graded areas, and this could potentially impact the downstream water quality.

Refueling and parking of construction equipment and other vehicles on-site during construction may result in spills of oil, grease, or related pollutants that may discharge into drainages.

Improper handling, storage, or disposal of fuels and materials or improper cleaning of machinery close to area waterways could cause water quality degradation.

The State Water Resources Control Board is responsible for implementing elements of the Clean Water Act and has issued a statewide General Permit (Water Quality Order 99-08-DWQ) for construction activities within the state. The State General Construction Activity Storm Water Permit is implemented and enforced by Regional Water Quality Control Boards and applies to construction activities that disturb one acre or more. This permit also requires the preparation and implementation of a Storm Water Pollution Prevention Plan that identifies BMPs to minimize pollutants from discharging from construction sites to the maximum extent practicable.

The BMPs that must be implemented can be grouped into two major categories: (1) erosion and sediment control BMPs and (2) non-stormwater management and materials management BMPs. Erosion and sediment control BMPs fall into four main subcategories:

- Erosion controls
- Sediment controls
- Wind erosion controls
- Tracking controls

During construction of projects within the City, the dischargers must eliminate non-stormwater discharges to stormwater systems, develop and implement a Storm Water Pollution Prevention Plan, and perform monitoring of discharges to stormwater systems.

During operation, runoff from the project site could contain oils, grease, fuel, antifreeze, and byproducts of combustion (such as lead, cadmium, nickel, and other metals), as well as nutrients from fertilizers and animal waste, sediment, pesticides, herbicides, and other pollutants. Also, sizable quantities of animal waste from pets (e.g., dogs, cats, and horses) contribute bacterial pollutants into surface and source waters. Precipitation during the early portion of the wet season displaces these pollutants into the stormwater runoff, resulting in high pollutant concentrations in the initial wet weather runoff. This initial runoff, containing peak pollutant levels, is referred to as the “first flush” of storm events. It is estimated that during the rainy season, the first flush of heavy metals and hydrocarbons would occur during the first 5 inches of seasonal rainfall.

The amount and type of runoff generated by development of the project site would be greater than that under existing conditions due to increases in impervious surfaces. There would be a corresponding increase in urban runoff pollutants and first flush roadway contaminants such as heavy metals, oil, and grease, as well as an increase in nutrients (i.e., nitrates and phosphates), and pesticides and herbicides from landscaped areas. These constituents would result in water quality impacts to on- and off-site drainage flows and to downstream area waterways, including Hambright and Stony Creeks as well as the Sacramento River.

Surface waters provide for a variety of functions for plants and animals, including a water source, habitat, foraging, cover, and migration and movement corridors. Adverse impacts to surface

waters can cause detrimental harm to the organisms that rely upon these waters and to biological integrity as a whole.

The collection of fees and determined fair share fee amounts are adopted by the City as Conditions of Approval (COAs) for all new development projects prior to project approval. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions. Additionally, through compliance with the NPDES permit requirements, and compliance with the SWPPP, the proposed project would not result in a violation of any water quality standards or waste discharge requirements. Therefore, through compliance with the NPDES, the SWPPP required by Project Requirement 3, impacts are considered **less than significant**.

Implementation of the above proposed General Plan policies and programs as well as compliance with NPDES permit requirements would ensure that both construction-related and operational impacts to surface water resources in the General Plan Planning Area would be less than significant.

Project Requirement(s)

Project Requirement 3: *The project applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that includes specific types and sources of stormwater pollutants, determine the location and nature of potential impacts, and specify appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff. The SWPPP shall require treatment BMPs that incorporate, at a minimum, the required hydraulic sizing design criteria for volume and flow to treat projected stormwater runoff. The SWPPP shall comply with the most current standards established by the North Coast RWQCB. Best Management Practices shall be selected from the City's Manual of Stormwater Quality Control Standards for New Development and Redevelopment according to site requirements and shall be subject to approval by the City Engineer and North Coast RWQCB.*

Response b): Less than Significant. The proposed project would not result in the construction of new groundwater wells, nor would it increase existing levels of groundwater pumping. The proposed project would be served by the City's municipal water system.

Groundwater recharge occurs primarily through percolation of surface waters through the soil and into the groundwater basin. The addition of significant areas of impervious surfaces (such as roads, parking lots, buildings, etc.) can interfere with this natural groundwater recharge process. Upon full project buildout, portions of the project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the project site.

Because the City has adequate existing water service capacity to serve the project, and the limited scope of impervious surface coverage (when compared to the larger groundwater basin), the proposed project would result in **less-than-significant impacts** related to depletion of groundwater supplies and interference with groundwater recharge.

Response c): Less than Significant. When land is in a natural or undeveloped condition, soils, mulch, vegetation, and plant roots absorb rainwater. This absorption process is called infiltration or percolation. Much of the rainwater that falls on natural or undeveloped land slowly infiltrates the soil and is stored either temporarily or permanently in underground layers of soil. When the soil becomes completely soaked or saturated with water or the rate of rainfall exceeds the infiltration capacity of the soil, the rainwater begins to flow on the surface of land to low lying areas, ditches, channels, streams, and rivers. Rainwater that flows off of a site is defined as storm water runoff. When a site is in a natural condition or is undeveloped, a larger percentage of rainwater infiltrates into the soil and a smaller percentage of flows off the site as storm water runoff.

The infiltration and runoff process is altered when a site is developed with urban uses. Houses, buildings, roads, and parking lots introduce asphalt, concrete, and roofing materials to the landscape. These materials are relatively impervious, which means that they absorb less rainwater. As impervious surfaces are added to the ground conditions, the natural infiltration process is reduced. As a result, the volume and rate of storm water runoff increase. The increased volumes and rates of storm water runoff may result in flooding if adequate storm drainage facilities are not provided.

There are no rivers, streams, or water courses located on or immediately adjacent to the project site. As such, there is no potential for the project to alter a water course, which could lead to on or offsite flooding. Drainage improvements associated with the project site would be located on the project site, and the project would not alter or adversely impact offsite drainage facilities.

Development of the project site would place impervious surfaces on portions of the project site. Development of the project site would potentially increase local runoff production, and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels. Stormwater flows from the project site would be directed to the two proposed retention basins by a new stormwater conveyance system.

In order to ensure that stormwater runoff from the project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, Project Requirement 3 requires the preparation of a SWPPP. As described previously, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site during both the construction and operational phases of the project.

The project is also required to pay all applicable development impact fees, which would include funding for offsite Citywide storm drainage infrastructure. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of applicable development impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards future system expansions.

In order to ensure that stormwater runoff from the project site does not adversely increase pollutant levels in adjacent surface waters and stormwater conveyance infrastructure, or otherwise degrade water quality, Project Requirement 3 requires the preparation of a SWPPP, and structural BMPs. As described above, the SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. The implementation of this requirement would reduce this impact to a less than significant level.

Implementation of Project Requirements 3 would ensure that this impact is **less than significant**.

Response d): Less than Significant. Flooding can be a major problem and is most predominant throughout the Central Valley region along the Sacramento River corridor. All of the mapped floodplains in the City of Orland Planning Area are located along Hambright and Stony Creeks. These two creeks traverse areas in the vicinity of locations where future development is likely to occur. However, the project site is not located near these creeks, nor is it located within the 100-year floodplain. The 100-year floodplain denotes an area that has a one percent chance of being inundated during any particular 12-month period.

Floodplain zones are determined by the Federal Emergency Management Agency (FEMA) and used to create Flood Insurance Rate Maps (FIRMs). These tools assist cities in mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction, whether residential, commercial, or industrial within 100-year floodplains.

Separately, the project site is located within a dam inundation risk area for the Black Butte Dam. Figure 5 shows a dam failure inundation map, in comparison to the project site. As shown, the City of Orland, including the project site, is within this dam inundation risk area.

The safety of dams in California is stringently monitored by the California Department of Water Resources, Division of Safety of Dams (DSD). The DSD is responsible for inspecting and monitoring the dam in perpetuity. The proposed project would not result in actions that could result in a higher likelihood of dam failure. There will always be a remote chance of dam failure that results in flooding of portions of the city.

The proposed project is identified for commercial land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts, relating to dam inundation.

Additionally, there are no significant bodies of water near the project site that could result in the occurrence of a seiche or tsunami. Additionally, the project site and the surrounding areas are

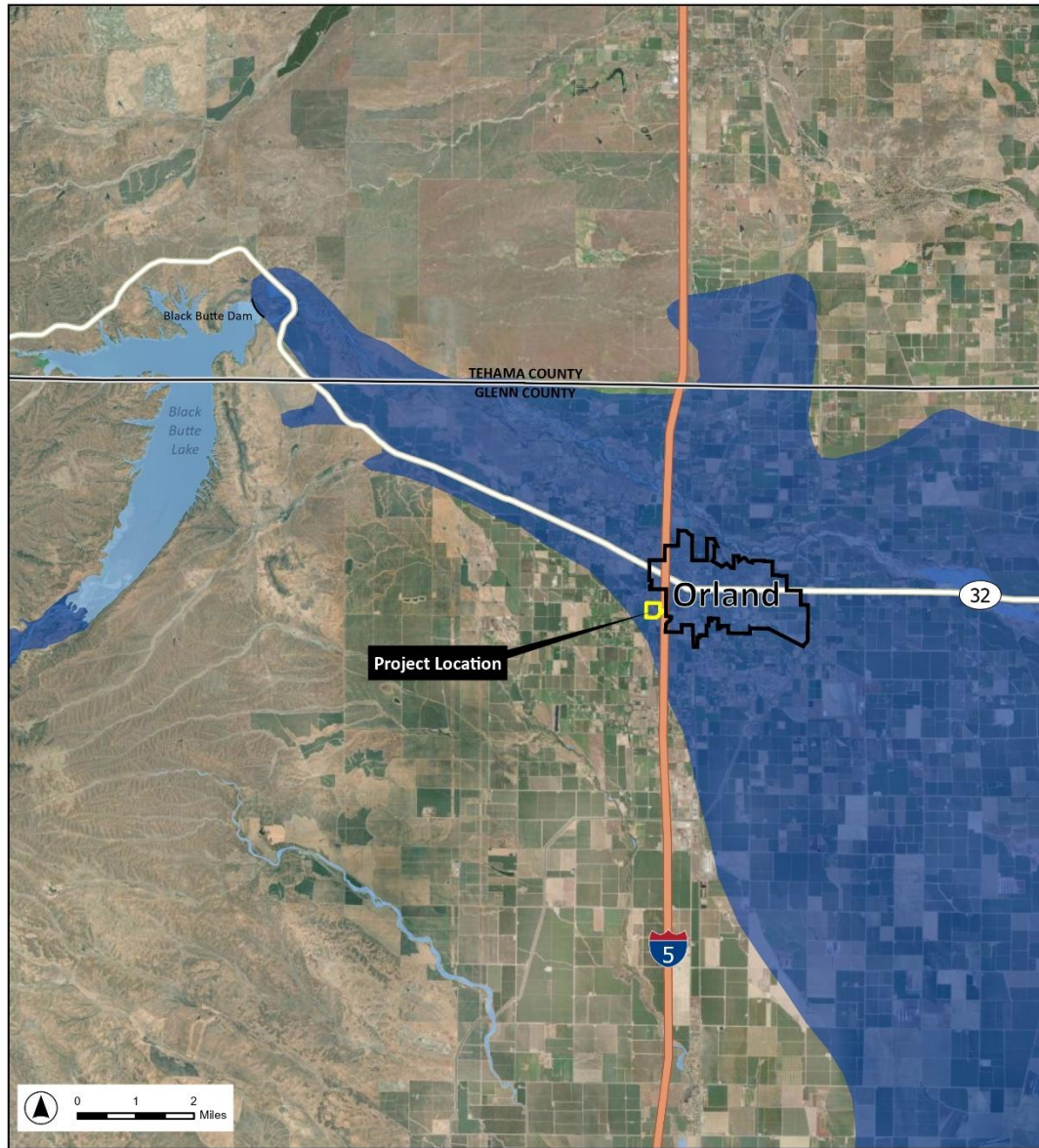
relatively flat, which precludes the possibility of mudflows occurring on the project site. This is a **less-than-significant impact**.

Response e): Less than Significant. As discussed previously, upon full project buildout, portions of the project site would be covered in impervious surfaces, which would limit the potential for groundwater percolation to occur on the project site. However, given the relatively large size of the groundwater basin in the Orland area, the areas of impervious surfaces added as a result of project implementation will not adversely affect the recharge capabilities of the local groundwater basin. Additionally, the project would maintain pervious surfaces within the on-site landscaping and retention basins. These pervious areas could maintain opportunities for groundwater recharge.

Additionally, Project Requirement 3 requires the preparation of a SWPPP, and structural BMPs. The SWPPP would require the application of BMPs to effectively reduce pollutants from stormwater leaving the site, which would ensure that stormwater runoff does not adversely increase pollutant levels, and would reduce the potential for disturbed soils and ground surfaces to result in erosion and sediment discharge into adjacent surface waters during construction and operational phases of the project. Additionally, the project will be required to submit a stormwater control plan that demonstrates the project incorporates site design measures, landscape features, and engineered treatment facilities (typically bioretention facilities) that will minimize imperviousness, retain or detain stormwater, slow runoff rates, and reduce pollutants in post-development runoff.

Conclusion

Overall, implementation of the proposed project would have a **less-than-significant impact** relative to this topic.



Legend

- West Orland Annexation Area
- City of Orland
- County Boundary
- Water Feature
- Black Butte Dam Failure Inundation Area

WEST ORLAND ANNEXATION

Figure 5. Dam Failure Inundation Areas

Sources: California State Geoportol; USGS Transportation Dataset; California Office of Emergency Services. Map Date: January 5, 2026.

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XI. LAND USE AND PLANNING - WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): No Impact. The project site is located in a commercial, light industrial, and rural residential area. The surrounding area adjacent to the project site includes agricultural uses to the east, west, and south; rural residential uses to the north, east, and south; some commercial uses are located to the east of the Project site (i.e. the Orland Inn and the K&M Thai Noodle House). Orland Estates, a mobile home park, is located south of the Project site. Additionally, Interstate 5 (I-5) travels north-south just to the east of the project site. The project site and the surrounding uses are designated Commercial, Light Industrial/Commercial, Rural Residential, and Medium Residential by the City’s General Plan. The project would be consistent and compatible with the surrounding land uses, and would not divide an established community. There is **no impact**.

Response b): Less than Significant. The City Orland General Plan land use designation for the project site is Commercial, Light Industrial/Commercial, and Low Density Residential. The Commercial designation allows up to 60 percent building coverage and up to 100 percent coverage by parking/paved areas in the downtown area. This classification is intended to provide for a range of uses including retail stores, restaurants, professional and medical offices, large office complexes, light manufacturing plants, outdoor recreation facilities, hotels, and many other uses involving the sale of a product or a service. The Light Industrial/Commercial designation allows for uses such as processing, packaging, machinery, repair, fabricating, distribution, warehousing and storage, research and development, and similar uses which omit limited amounts of smoke, noise, light, or pollutants. Lastly, the Low Density Residential designation allows for development at a density of up to 6 dwelling units per acre.

The proposed use and density on the project site is consistent with the General Plan designations of Commercial, Light Industrial/Commercial, and Low Density Residential. The project’s consistency with other General Plan policies that provide environmental protections are addressed within the relevant sections of this document. This is a **less-than-significant impact**.

XII. MINERAL RESOURCES -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): No Impact. The sand and gravel currently mined in the region is used primarily for construction. Construction aggregates are an important, fundamental building material used extensively as a foundation and road base material. In terms of volume and price, there is presently no economically viable substitute for aggregate products. The demand for aggregate products in the region has increased with the region’s population and corresponding physical growth. Under the proposed General Plan, demand is expected to increase, as population and physical growth continue to increase. Should known resources become depleted or unavailable, the aggregates industry will need to relocate or begin importing, at a much higher cost, from more distant areas.

There is currently no mining activity occurring within, nor is it allowed in the project site. Furthermore, the General Plan, nor the Glenn County General Plan identify any mineral resource zones within the City of Orland or the project site. Therefore, implementation of the project would have a less than significant impact on mineral resources. Therefore, the project would not result in the loss of availability of a known mineral resource. There is **no impact**.

XIII. NOISE -- WOULD THE PROJECT RESULT IN:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The proposed project is located in an area consisting predominately of commercial, light industrial, agricultural, and rural residential uses. Depending on the ultimate tenant of the proposed buildings, the commercial land uses would generate operational noise levels similar to those associated with common commercial land uses, such as retail and consumer service activities, and office uses. However, traffic generated by the proposed project has the potential to contribute to roadway noise levels in the vicinity of the project site and throughout other areas of the City. Increases in roadway noise and other sources of noise associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

The proposed project is identified for commercial, light industrial, and low density residential land uses in the Orland General Plan. The proposed project is consistent with the overriding considerations that were adopted for the General Plan and the established mitigation measures under that Plan. As such, implementation of the proposed project would not create new impacts over and above those identified in the General Plan EIR, nor significantly change previously identified impacts.

The Orland General Plan Noise Element contains several policies that are intended to ensure that new development projects are not exposed to excessive noise levels. The General Plan Noise Element policies applicable to the proposed project are summarized below.

Policy 6.1.A and Policy 6.1.F identify interior and exterior noise level standards for noise-sensitive areas of new uses affected by traffic or railroad noise sources as well as non-

transportation noise sources in the City of Orland. Policies 6.1.B and 6.1.H state that where the noise level standards (Table 6-3 and 6-5 in the proposed General Plan) are predicted to be exceeded at new uses proposed within the City of Orland which are affected by traffic or railroad noise and/or are affected by or include non-transportation noise sources, appropriate noise mitigation measures and/or conditions of approval shall be included in the project design to reduce projected noise levels to a state of compliance with the standards identified in Table 6-3 and 6-5 in the proposed General Plan.

Policy 6.1.D states that if future railroad operations occur during nighttime hours (10 p.m. to 7 a.m.), then proposals for the development of new residential uses within 1,000 feet of railroad grade crossings should address noise impacts in terms of the potential for sleep disturbance. Policy 6.1.E states that if an acoustical analysis is required by the City to assess compliance with the City's Noise Element standards, it shall be prepared in accordance with Table 6-4 of the proposed General Plan, Requirements for Acoustical Analyses Prepared in Orland. This table identifies noise analysis standards such as the requirement that all noise analyses include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions as well as the need for all noise analyses to be prepared by qualified persons experienced in the fields of environmental noise assessment and architectural acoustics.

The proposed project would not directly generate increased noise beyond those activities commonly found in commercial uses. The noise directly generated by the project would not differ from the existing ambient noises currently generated by the surrounding commercial, light industrial, agricultural, and rural residential uses. The project is not anticipated to generate significant noise levels, given that activities would be limited to vehicle traffic, and the loading and unloading of materials.

However, the proposed project is expected to increase ambient noise levels in the project vicinity through the introduction of additional vehicle trips to area roadways, particularly along nearby roadways such as Bungalow Road and W. Newport Road. However, as described above, development of the site for commercial uses and the subsequent increase in vehicle roadway noise was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the significant generation of long-term ROG, NO_x, and PM emissions resulting from adoption of the General Plan.

Additionally, construction activities at the project site would result in temporary increases in noise levels that could expose adjacent residences to increased noise levels and noise nuisances. Construction activities could create temporary noise levels of up to 90 dBA at distances of 50 feet. Because the project site is surrounded by existing residential neighborhoods, this temporary increase in construction noise is considered potentially significant.

Project Requirement 4 would place restrictions on the time of day that construction activities can occur, and includes additional techniques to reduce noise levels at adjacent residences during

construction activities. The implementation of this requirement would reduce this temporary impact to a **less-than-significant** level.

Project Requirement(s)

Project Requirement 4: *The following requirements shall be implemented during all construction phases of the project:*

- a) *Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Construction activities shall be prohibited on Sundays and federal holidays.*
- b) *Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.*
- c) *Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.*

Response b): Less than Significant. No major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. In addition, the proposed project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at nearby existing land uses. However, construction activities associated with the proposed project would require the use of various tractors, trucks, and potentially jackhammers that could result in intermittent increases in groundborne vibration levels. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for construction of the proposed project.

Groundborne vibration levels commonly associated with construction equipment are summarized in Table NOISE-1. Based on the levels presented in Table NOISE-1, groundborne vibration generated by construction equipment would not be anticipated to exceed approximately 0.09 inches per second (in/sec) peak particle velocity (ppv) at 25 feet. Predicted vibration levels would not be anticipated to exceed recommended criteria for structural damage and human annoyance (0.2 and 0.1 in/sec ppv, respectively) at nearby land uses. As a result, short-term groundborne vibration impacts would be considered **less than significant** and no mitigation is required.

Table NOISE-1: Representative Vibration Source Levels for Construction Equipment

<i>EQUIPMENT</i>	<i>PEAK PARTICLE VELOCITY AT 25 FEET (IN/SEC)</i>
Large Bulldozers	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozers	0.003

SOURCE: FTA 2006, CALTRANS 2004.

Response c): Less than Significant. The Orland Airport (Orland-Haigh Field) is the closest airport to the project site, located approximately 3 miles to the southeast. The Airport is owned by Glenn County. There are no airports within 2 miles of the project site. The project site is also not within the vicinity of a private airstrip or an airport land use plan. This is a **less-than-significant impact**.

XIV. POPULATION AND HOUSING -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The proposed project could induce population growth directly and/or indirectly, dependent on the exact uses located within the Project site. Regardless, the potential for the project to directly or indirectly induce population growth in the City of Orland is not a significant impact in and of itself. Population growth can result in impacts to other environmental topics, such as traffic, service demands, etc. The population and employment growth that would occur as a result of approval and development of the proposed project was considered in the Orland General Plan and General Plan EIR. The proposed project is consistent with the land use designation for the site that was addressed in the General Plan EIR, and the environmental effects of the employment growth generated by the project were considered in the analysis of buildout of the Orland General Plan. Additionally, as described throughout this environmental document, the employment growth attributable to the proposed project would not result in any significant site-specific environmental impacts to other environmental topics that cannot be mitigated to a less-than-significant level. Therefore, this impact is **less than significant**, as demonstrated throughout this document.

Response b): Less than Significant. There are no residences located on the project site. As such, the project would not displace any residences. Moreover, the land uses proposed as part of the project were considered in the Orland General Plan and General Plan EIR. The proposed project is consistent with the land use designation for the site that was addressed in the General Plan EIR, and the environmental effects of the displacement generated by the project was considered in the analysis of buildout of the Orland General Plan. Therefore, the project would have a **less-than-significant impact**.

XV. PUBLIC SERVICES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?			X	
ii) Police protection?			X	
iii) Schools?			X	
iv) Parks?			X	
v) Other public facilities?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a):

i) Fire Protection and Emergency Medical Services: Less than Significant. The Orland Volunteer Fire Department was formed in 1911 after much of Orland’s downtown burned in a devastating fire. In July of 2019, the City in partnership with the Orland Rural Fire Protection District and OVFD, hired Orland’s first paid Fire Chief, Justin Chaney. Chief Chaney has been the fire chief for the volunteers since 2017.

Recognizing the potential need for increases in fire protection and emergency medical services, the City’s General Plan includes policies to ensure that adequate related facilities are funded and provided to meet future growth. Implementation of the proposed project would not adversely impact existing fire and emergency services within the city and would not require the construction of new fire protection facilities. Impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant as COAs prior to project approval, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund capital and labor costs associated with fire protection services.

In order to provide adequate fire protection and suppression services to the project site, the Orland Volunteer Fire Department must have access to adequate onsite hydrants with adequate fire-flow pressure available to meet the needs of fire suppression units. The final site plans and development specifications developed for the proposed project will indicate the location and design specifications of the fire hydrants that will be required within the project site. Therefore, this is considered a **less-than-significant impact**.

ii) Police Protection: Less than Significant. The Orland Police Department is the local law enforcement agency serving the city of Orland, California, located at 817 4th Street, Orland, CA 95963. The department is dedicated to proactive policing, crime prevention, community safety, and emergency response, operating 24/7 with a team of 10 full-time sworn officers and 2 full-time civilians.

Impact fees from new developments are collected based upon projected impacts from each development by the City as COAs prior to project approval. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, and other revenues generated by the project, would fund capital and labor costs associated with police services.

It is not anticipated that implementation of the proposed project would result in significant new demand for police services. Project implementation would not require the construction of new police facilities to serve the project site, nor would it result in impacts to the existing response times and existing police protection service levels. Furthermore, the City's General Plan ensures the City maintains adequate police staffing, performance levels and facilities to serve Orland's existing population as well as any future growth. Therefore, this is considered a **less-than-significant impact**.

iii) Schools: Less than Significant. Implementation of the proposed project would result in modest employment growth within the City of Orland, which may increase enrollment at schools within the Orland Unified School District incrementally. The Orland Unified School District collects impact fees from new developments under the provisions of SB 50. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from taxes, would fund capital and labor costs associated with school services. The adequacy of fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund improvements associated with school services and would ensure that project impacts to school services are **less than significant**.

iv) Parks: Potential project impacts to parks and recreational facilities are addressed in Section XVI, Recreation, of this document.

v) Other Public Facilities: Less than Significant. Other public facilities in the City of Orland include libraries, hospitals, and cultural centers. The proposed project may increase demand on these facilities in a limited capacity. The City of Orland General Plan requires new development to pay its fair share of the costs of public buildings. Payment of the applicable impact fees by the project applicant, as COAs prior to project approval, and ongoing revenues that would come from taxes, would ensure that project impacts to public facilities are **less than significant**.

XVI. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Less than Significant. The proposed project would not increase demand for parks and recreational facilities within the City of Orland and would not increase the use of the City’s existing parks and recreation system. The City of Orland requires the payment of the project’s fair share in-lieu parks fees, as required by the City’s General Plan. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. Fees paid aid in the development of new park space and maintenance as required, to ensure continued high quality park facilities for all City residents. As such, this is a **less-than-significant impact**.

XVII. TRANSPORTATION -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. The project would not conflict with any existing plans or policies related to alternative transportation. The payment of fair-share traffic impact fees would provide funding for transportation improvements throughout the city.

The proposed project is consistent with the General Plan land use designation for the site and is consistent with the assumed density level for development of the site. The generation of vehicle traffic associated with the proposed project was considered during preparation of the Orland General Plan. The Orland General Plan identifies the roadway and intersection improvements needed in order to maintain acceptable levels of service throughout the city.

The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of applicable traffic impact fees by the proposed project would ensure that the project pays its fair-share of capital improvement fees towards the future transportation system improvements and expansions. The payment of these fair-share traffic impact fees would assist the City of Orland with implementation of the various improvements previously planned for, in order to maintain acceptable levels of service throughout the city.

The proposed project would not induce any additional required improvements. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. The payment of the required traffic impact fees to the City of Orland would reduce project-related traffic impacts to a **less than significant** level.

Response b): Less than Significant. As noted previously, the Orland General Plan land use designation for the project site is consistent with the proposed project. An EIR for the City's General Plan was prepared previously, and the proposed project is consistent with the uses assumed for the project site in both documents. The project would not increase transportation-related impacts beyond which were previously analyzed in both the General Plan EIR. This impact would be **less than significant**.

Response c): Less than Significant. Implementation of the proposed project would not result in a geometric design feature that is inconsistent with applicable design standards for the City of Orland. The project would not result in a significant change to the vehicle mix or speed of traffic that is not compatible with the design of existing or planned facility design.

The project would not propose any new roadways or transportation facilities that would be inconsistent with applicable design standards for the City of Orland. The project proposes an increased land use density, which would result in increased travel activity, including vehicle (cars and trucks), bicycle, pedestrian, and potentially transit trips. In order to provide access to and from the project site, the accesses the project site would be designed to serve automobiles, bicyclists, pedestrians, and Surface Transportation Assistance Act (STAA) vehicles. These project-generated trips would be served by existing and planned facilities that are constructed to applicable design standards to serve these travel modes. Therefore, the proposed project would not result in a change to the vehicle mix or speed of traffic that is not compatible with the design of existing or planned roadways and transportation facilities. This impact would be **less than significant**.

Response d): Less than Significant. Implementation of the proposed project would not create roadway and transportation facilities that impede access for emergency response vehicles. The proposed site accessways, improvements to nearby roadways, and internal transportation network is designed to maintain levels of accessibility for police and fire response times, which ensures vehicles have the necessary access when responding to an emergency.

Several emergency (police and fire) services are located near to the project site. The internal circulation is designed to meet City code for emergency vehicle access and would maintain high levels of emergency vehicle accessibility and mobility, which ensures vehicles have the necessary access when responding to an emergency. Emergency vehicles would have unimpeded access to the project site. Therefore, this is considered a **less-than-significant impact**.

XVIII. TRIBAL CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?			X	
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a-b): Less than Significant. There is a potential for the discovery of prehistoric, ethnohistoric, or historic archaeological sites that may meet the definition of Tribal Cultural Resources (TCRs). Although no TCRs have been documented on the project site, the project is in a region where significant cultural resources have been recorded and there remains a potential that undocumented archaeological resources that may meet the TCR definition could be unearthed or otherwise discovered during ground-disturbing and construction activities. Examples of significant archaeological discoveries that may meet the TCR definition would include villages and cemeteries. Due to the possible presence of undocumented TCRs within the project site, construction-related impacts on tribal cultural resources may occur.

Project Requirement 1 in Section V, Cultural Resources, would require appropriate steps to preserve and/or document any previously undiscovered resources that may be encountered during construction activities, including human remains. Implementation of this requirement would reduce this impact to a **less than significant** level.

XIX. UTILITIES AND SERVICE SYSTEMS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reductions goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a), c): Less than Significant.

Wastewater

The City wastewater collection and treatment system comprises an extensive collection system and four sewage treatment ponds. Treated effluent from the treatment facility is discharged to a 50-acre parcel.

All sewage that is generated inside of the city limits is collected and treated by the Orland Wastewater Collection and Treatment Facility (WCTF). Areas immediately surrounding Haigh Field are also served by the WCTF. Other than Haigh Field, areas outside of the city limits are treated by private on-site septic systems. The treatment facility utilizes a primary treatment process consisting of a bar-screen located at the headworks building with screened effluent being disposed into a rotating series of four sewage disposal ponds located west of the airport. These four primary settling ponds, along with two specially lined and isolated brine ponds, are located on a 50-acre City-owned parcel of land.

The Orland General Plan EIR determined that no significant wastewater-related impacts were identified as a result of buildout of the General Plan. Because the project is consistent with the

intended uses allowed under the General Plan no impacts beyond those identified should result from implementation of the proposed project.

The City has adequate capacity to serve the project's projected demand for wastewater treatment services in addition to its existing commitments, and no improvements or expansions to the existing WCTF are required to serve the proposed project. The addition of project-generated wastewater would not result in any RWQCB violations related to effluent treatment or discharge. Implementation of the proposed project would have a **less-than-significant impact**.

Stormwater

The City of Orland's stormwater drainage system consists primarily of surface water conveyance utilizing curbs and gutters which lead to underground drainage pipes that eventually discharge into the Lely Aquatic Pond, the Stony Creek Basin Tributary Area, or on-site retention basin and leach field systems.

Development of the project site would place impervious surfaces on the majority of the project site. Development of the project site would potentially increase local runoff production and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

Permanent onsite storm drainage would be installed to serve the proposed project. The potential environmental impacts of construction of the onsite storm drainage system are addressed throughout this Initial Study, given that all improvements would occur onsite, within the area proposed for disturbance. As described above under the Hydrology and Water Quality Section, new development projects in the City of Orland are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach as required by the City of Orland.

The development of an onsite storm drainage system that is approved by the City engineer, the payment of all applicable fees, and the implementation of a SWPPP that includes specific types and sources of stormwater pollutants, determines the location and nature of potential impacts, and specifies appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff (as required under Project Requirement 3), ensure that impacts to storm water drainage facilities are **less than significant**.

Response b): Less than Significant. Potable water for the proposed project would be supplied from the City's municipal water system. The City of Orland's primary water system, Public Water System 1110001, consists of six wells distributed throughout the City. The sole source of water within the City is groundwater. The wells have an average depth of approximately 200 feet, and the average depth of groundwater is generally between 20 and 50 feet. Pressure for the City water system is provided by gravity flow from an 80,000-gallon elevated storage tank. The wells produce between approximately 500 and 1,200 gallons per minute each.

The water transmission and distribution systems consist of approximately 34 miles of pipeline ranging in diameter from 4 inches to 10 inches. To serve the new development associated with the project site, water lines would need to be installed or extended.

The Colusa Subbasin, which supplies potable water to the City of Orland, shows an average seasonal fluctuation of approximately 5 feet for normal and dry years. Despite seasonal variations, long-term groundwater levels of the Colusa Subbasin have remained relatively constant. As described in the Orland General Plan EIR, the estimated storage capacity to a depth of 200 feet is approximately 13,025,887 acre-feet and estimates of groundwater extraction for agricultural, municipal and industrial, and environmental wetland uses are 310,000; 14,000; and 22,000 acre-feet, respectively. The Department of Water Resources has not identified the Colusa Subbasin as overdrafted in its DWR Bulletin 118. Also, there has been no indication of any existing or anticipated overdraft condition in studies prepared by other entities.

Based on an occupancy factor of 2.50 persons per water service connection and a City population of 12,286 residents, Orland will have approximately 4,914 active water service connections by 2028. Orland General Plan policies ensure that adequate water supply would be available for the proposed project.

Policy 5.6.E encourages conservation of water, as well as minimizing costs associated with pumping and delivery systems. Policy 5.7.B promotes the efficient use of water within the City's Planning Area, which would be achieved by promoting the use of water-conserving devices for new construction and major renovations (Program 5.7.B.1). Program 5.7.B.2 requires new development to fund its fair share portion of its impacts to all water supply-related services and facilities.

Implementation of the proposed General Plan policies and programs listed above as well as the mitigation measures contained within the Orland General Plan EIR, would ensure that sufficient water capacity is available to support new development in conjunction with existing development. Therefore, implementation of the proposed General Plan would result in water demand-related impacts that are considered less than significant. The City's water treatment and conveyance infrastructure is adequate to serve existing demand, in addition to the demand created by the proposed project. Therefore, this is a **less-than-significant impact**.

Responses d), e): Less than Significant. Glenn County prepared the required Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE) in 1992. Glenn County leases and operates a landfill located at the west end of County Road 33 off Interstate 5 in Artois. Orland residents can contract individually with Waste Management for curbside waste and recycling collection services. Orland area waste is delivered to the Glenn County Landfill by Waste Management.

The proposed project would not generate significant volumes of solid waste, beyond levels normally found in commercial developments. Using CalRecycle's commercial use solid waste generation rate of 5 pounds per 1,000 sf per day, the project is expected to produce a maximum

of approximately 8,058 pounds per day. The addition of the solid waste generated by the project would not exceed the capacity of the local landfills.

As described above, there is adequate landfill capacity to serve the proposed project, and the project will comply with all applicable statutes and regulations related to solid waste. This is a **less-than-significant impact**.

XX. WILDFIRE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

EXISTING SETTING

The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents) and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point, while fuels such as trees have a lower surface area to mass ratio and require more heat to reach the ignition point.

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b), c), d): Less than Significant. The proposed project is not located within a State Responsibility Area (SRA) or Local Responsibility Area (LRA).⁶ Overall, the project site is not located within a designated wildfire hazard area.

Moreover, the proposed project would require building construction to meet the fire code requirements, and would have fire hydrants consistent with the standards of the City; such fire hydrants would assist with fire suppression efforts if a fire was to occur on or near the project site. Additionally, there are no steep slopes on or near the project site. Development of the project would not exacerbate fire risks. Furthermore, development within the project site would require fire hydrants consistent with the standards of the City, and such fire hydrants would assist with fire suppression efforts if a fire was to occur. The proposed infrastructure improvements would

⁶ <https://www.glenncountyrca.org/files/9a9d8cabb/Map+B.pdf>

allow for decreased fire risk relative to existing conditions. The proposed project would also require the installation of storm drainage infrastructure to ensure that storm waters properly drain from the project site and does not result in downstream flooding or major drainage changes. The storm drainage plan would be designed and engineered to ensure proper construction of storm drainage infrastructure to control runoff and prevent flooding, erosion, and sedimentation. Overall, impacts related to wildfire would be considered **less-than-significant impact**.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

RESPONSES TO CHECKLIST QUESTIONS

Response a): Less than Significant. As described throughout the analysis above, the proposed project would not result in any significant impacts that would substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal to the environment.

All potentially significant impacts related to plant and animal species would be reduced to a less-than-significant level through the application of uniformly applied development policies and/or standards. The proposed project is required to implement a range of standard and uniformly applied development policies and standards, most of which are identified in the Orland General Plan, which would reduce any potentially significant impacts to a less than significant level. The cumulative impacts associated with development of the project were considered, analyzed and disclosed in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for all significant impacts resulting from adoption of the General Plan. The project would not result in any cumulative impacts that were not contemplated in the General Plan EIR. The project would not result in any peculiar site-specific impacts, impacts to biological resources or impacts to cultural and/or historical resources.

The proposed project would implement requirements aimed at reducing stormwater pollutants and runoff, as well as through compliance of various state, regional and local standards. Through the application of uniformly applied development policies and/or standards, the project would

not result in any cumulative impacts related to biological resources. Therefore, these are **less-than-significant impacts**.

Response b): Less than Significant. The General Plan EIR assumed full development and buildout of the project site, consistent with the use and density proposed by the project. The cumulative impacts associated with buildout of the City of Orland General Plan, including the project site, were fully addressed in the General Plan EIR. Additionally, as described throughout the analysis above, the proposed project would not result in any significant individual or cumulative impacts that would not be reduced to less than significant levels through the application of uniformly applied development policies and/or standards. Therefore, this is considered a **less-than-significant impact**.

Response c): Less than Significant. As described throughout the analysis above, the proposed project would not result in any significant impacts that would have environmental effects which will cause substantial adverse effects on humans. The analysis in the relevant sections above provides the application of uniformly applied development policies and/or standards reduce any potentially significant impacts on humans to less than significant levels. A variety of requirements including those related to cultural resources, seismic hazards, water pollution and water quality, and noise, ensure any adverse effects on humans are reduce to an acceptable standard. Therefore, this is considered a **less-than-significant impact**.

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ANNEXATION PLAN

FOR THE

WEST ORLAND ANNEXATION PROJECT

FEBRUARY 2026

Prepared for:

Glenn County Local Agency Formation Commission
525 West Sycamore Street, 2nd Floor
Willows, CA 95988

and

City of Orland
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A Land Use Planning, Design, and Environmental Firm

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WEST ORLAND –ANNEXATION PLAN

EXECUTIVE SUMMARY

Introduction

This Annexation Plan is designed to provide important background information to allow for a thorough justification of this annexation proposal and to ensure compliance with all Glenn County Local Agency Formation Commission (LAFCo) rules and regulations, as well as other applicable regulatory requirements, including the California Government Code.

The City of Orland (City) proposes to annex approximately 37 acres of land located in an unincorporated area of Glenn County (County) within the southwestern portion of the City of Orland’s Sphere of Influence (SOI) and Planning Area (the “Project site”). The proposed Project (hereinafter referred to as the “Annexation Project”) consists solely of annexation of the Project site into the City of Orland and rezoning of the site, as described below.

Approval of a site plan is not being requested by the applicant at this time, as all site plans and specific development proposals remain conceptual. No discretionary entitlements or specific development approvals are being requested as part of the Annexation Project beyond annexation and rezoning. For the purposes of this analysis, it is assumed that any future development application on the Project site would include commercial uses consistent with the City of Orland’s intended rezoning designation of Highway Service Commercial (C-H).

The Highway Service Commercial (C-H) zoning district is intended to provide services and conveniences for the traveling public along major roadways and highway frontages at appropriate intervals and locations, in developments designed for safety, convenience, and suitable appearance. Typical uses allowed under the C-H zoning designation may include traveler-oriented commercial uses such as lodging, restaurants, fueling stations, and related service commercial uses.

The Project site is located within the City of Orland’s SOI but outside the existing city limits and will require annexation approval by the City of Orland and Glenn County Local Agency Formation Commission (LAFCo). The proposed annexation represents a logical extension of the City limits and is consistent with the City’s adopted SOI and long-term planning framework. No amendment to the City’s SOI is required as part of the Annexation Project.

Glenn County LAFCo will require the Project site to be rezoned by the City of Orland in conjunction with the proposed annexation. The City’s rezoning for the Project site would be the Highway Service Commercial (C-H) zoning designation. Upon annexation into the City of Orland, the Highway Service Commercial (C-H) rezoning designation would become the formal zoning designation for the Project site.

ANNEXATION PLAN

Annexation Plan Contents

The proposed Annexation Project does not include any residential components, nor does it propose any residential zoning designations. The Project is limited to annexation and rezoning of the approximately 37-acre project site to the City of Orland Highway Service Commercial (C-H) zoning designation and is intended to accommodate future traveler-oriented and service commercial uses.

Accordingly, the proposed annexation will not impact the City of Orland's ability to accommodate its Regional Housing Needs Allocation (RHNA) under the current Housing Element. This project does not alter the City's residential capacity or hinder its compliance with state housing law as administered by the California Department of Housing and Community Development (HCD). Therefore, this Annexation Plan does not include sections related to residential land use, RHNA site inventory contributions, or fair-share housing development phasing, as they are not applicable.

This Annexation Plan includes the following sections:

OPEN SPACE CONVERSION STATEMENT

The **Open Space Conversion Statement** provides background on the Annexation Project, describes the existing agricultural characteristics and uses of the annexation area, provides an analysis of the agricultural and conservation-related fees that the City would be required to pay, and provides a description of the type of soils located within the annexation area. This section also discusses the Annexation Project regarding the following (pursuant California Government Code Section 56377):

- a) Development or use of land other than open space uses shall be guided away from existing prime agricultural lands in open space use and towards areas containing non-prime agricultural lands, unless that action would not promote the planned orderly, efficient development of an area.
- b) Development of existing vacant or non-prime agricultural land for urban uses within the existing jurisdiction of a local agency or within the SOI of a local agency should be encouraged before any proposal is approved which would allow for or lead to the development of existing open-space lands for non-open space uses which are outside of the existing jurisdiction of the local agency or outside the existing SOI of the local agency.

CITY SERVICES PLAN

The **City Services Plan** has been prepared to fulfill the following requirement:

"Pursuant to California Government Code Section 56653, the Glenn County Local Agency Formation Commission (LAFCo) requires that any application for a change of organization or reorganization be accompanied by a plan for providing services. In accordance with Section 56653, the plan shall include:

- an enumeration and description of services to be extended to the affected territory;
- the level and range of those services;

ANNEXATION PLAN

- an indication of when those services can feasibly be extended to the affected territory;
- an indication of any improvements or upgrading of structures, roads, sewer or water facilities, or other conditions that the local agency would impose or require within the affected territory if the change of organization or reorganization is completed; and
- information with respect to how those services will be financed.”

Overall, existing and planned public services provided by the City of Orland are anticipated to be capable of serving the proposed Annexation Project. The Annexation Project would require the future extension of City services to the project site upon annexation, including public safety services (police and fire protection) and municipal utilities, as applicable. The general level and range of public services that would ultimately be required to serve future development of the project site are described in this document and would be evaluated in greater detail as part of any future discretionary development applications.

Because no specific development project is proposed at this time, detailed design, engineering, and construction of infrastructure and service extensions have not yet been defined. Any future improvements to public facilities and infrastructure necessary to serve development of the project site would be required to comply with City of Orland standards and policies and would be financed by future project proponents, subject to approval by the City.

Glenn County LAFCo will rely on the environmental analysis prepared for the Annexation Project when evaluating the proposed boundary change and associated service provision.

TIMELY AVAILABILITY OF WATER SUPPLIES

The **Timely Availability of Water Supplies** describes the City of Orland’s ability to serve the proposed annexation area with adequate water supplies. The City of Orland General Plan designates the project site for Commercial and Light Industrial/Commercial land uses, and the proposed Annexation Project, including rezoning of the site to Highway Service Commercial (C-H), is consistent with these land use designations.

Because no specific development proposal is being requested as part of the Annexation Project, water demand estimates are conceptual at this time and would be refined as part of future discretionary development applications. However, future development of the project site would constitute planned growth within the City of Orland’s Sphere of Influence and Planning Area. To the extent that future development of the annexation area would require additional water supplies, such growth has been contemplated in the City of Orland General Plan Draft Environmental Impact Report (EIR).

Furthermore, based on the City of Orland General Plan EIR and service planning assumptions, water supplies are anticipated to be available to serve the annexation area in a timely manner during normal, dry, and multiple dry year conditions, subject to compliance with applicable water service policies and the preparation of project-level analyses at the time of future development.

ANNEXATION PLAN

Justification and Findings

The Cortese-Knox-Hertzberg (CKH) Local Government Reorganization Act of 2000 is the section of the California Government Code (Section 56000 et seq.) that provides LAFCo with its authority, procedures, and functions. The CKH Act gives LAFCo power to “approve or disapprove with or without amendment, wholly, partially or conditionally” proposals concerning the formation of cities and special districts, annexation or detachment of territory to cities and special districts, and other changes in jurisdiction or organization of local government agencies.

Consistent with the requirement for LAFCo to review the proposed annexation request pursuant to the criteria provided in California Government Code Section 56337, the following justifications and findings are made in support of approval of the annexation request.

- 1) Lands within the annexation area are planned for urban uses in the Orland General Plan.
- 2) The annexation request includes an amendment to the City’s 10-year planning horizon.
- 3) The Project proposes an orderly and logical boundary for annexation and is contiguous to the City limits.
- 4) The Project creates a logical extension of the City boundaries and can be served by existing infrastructure.

1. OPEN SPACE CONVERSION STATEMENT

The annexation area is located in unincorporated Glenn County within the City of Orland’s Sphere of Influence (SOI) and Planning Area and is immediately adjacent to the existing Orland city limits. The City of Orland General Plan Land Use Map designates the project site for Commercial, Light Industrial/Commercial, and Low Density Residential land uses. The surrounding area adjacent to the project site includes agricultural uses to the east, west, and south; rural residential uses to the north, east, and south; and existing commercial uses to the east of the project site, including the Orland Inn and K&M Thai Noodle House. Interstate 5 (I-5) travels in a north–south direction immediately east of the project site. Land uses to the south of the project site include Orland Estates, a mobile home park, along with surrounding agricultural lands.

In reviewing to approve or deny proposals which could reasonably be expected to induce, facilitate, or lead to the conversion of existing open space lands to uses other than open space uses, the Glenn County LAFCo shall consider, pursuant to California Government Code Section 56377, the following:

- a) Development or use of land other than open space uses shall be guided away from existing prime agricultural lands in open space use and towards areas containing non-prime agricultural lands, unless that action would not promote the planned orderly, efficient development of an area.
- b) Development of existing vacant or non-prime agricultural land for urban uses within the existing jurisdiction of a local agency or within the sphere of influence of a local agency should be encouraged before any proposal is approved which would allow for or lead to the development of existing open-space lands for non-open space uses which are outside of the

existing jurisdiction of the local agency or outside the existing sphere of influence of the local agency.

Agricultural Lands

The project site currently consists primarily of agricultural land. However, the Annexation Project is identified primarily for commercial uses in the Orland General Plan, and the project is consistent with the uses established by the General Plan. Development of the site for urban uses and the corresponding conversion of agricultural land associated with buildout of the Orland General Plan, including the project site, was taken into consideration in the City of Orland General Plan and General Plan EIR. On February 21, 2012 the Orland City Council adopted a Statement of Overriding Considerations (Resolution No. 2012-01) for the direct impacts to farmland resulting from adoption of the General Plan and EIR.

Under the City of Orland Municipal Code, development impact fees are imposed on new development to fund the construction or expansion of public facilities and infrastructure needed to serve growth. While the City of Orland does not currently have a dedicated “agricultural mitigation fee” program, the Orland Municipal Code authorizes the City to adopt and collect various impact fees to offset the costs of providing public services and facilities necessary to serve new development. These include water, sewer, storm drainage, transportation, parks and recreation, and public safety facility impact fees, as established through the City’s adopted Development Impact Fee schedule and related implementing resolutions and ordinances¹.

The City of Orland General Plan and associated agricultural buffering guidelines include policies and programs that encourage the protection of agricultural lands outside the City’s planning area and direct urban development toward areas already identified for growth. While the Orland Municipal Code does not include a standalone agricultural mitigation fee, General Plan mitigation measures applied through environmental review may require agricultural buffers and/or conservation measures for projects that convert important farmland to urban uses.²

The proposed conversion of the project site from agricultural to commercial uses is consistent with the City of Orland General Plan land use designations and was anticipated in the City’s planning and environmental documents. Impacts associated with loss of agricultural land were evaluated as part of the General Plan’s environmental review, and applicable mitigation measures, including agricultural buffering and conservation programs, remain available to reduce potential impacts from future development on the annexed property³.

¹ City of Orland. *Development Impact Fee Study*. City of Orland, Dec. 2019, <https://www.cityoforland.com/wp-content/uploads/2021/06/Developement-Impact-Fee-Schedule.pdf>.

² City of Orland. *Agricultural Buffering Guidelines*. City of Orland, https://www.cityoforland.com/wp-content/uploads/2021/06/FINAL_Agri_Buff_Guide.pdf.

³ City of Orland. *Orland General Plan Update Final EIR*. City of Orland, <https://www.cityoforland.com/wp-content/uploads/2021/06/OrlandGeneralPlanUpdateFEIRFinalFull.pdf>.

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Soils

There are several methods for classifying soil quality for agricultural uses. One method involves a soil capability rating provided the National Resources Conservation Service (NRCS). This classification shows, in a general way, the suitability of soils for most kinds of field crops. Crops that require special management are excluded. The soils are grouped according to their limitations for field crops, the risk of damage if they are used for crops, and the way they respond to management. The criteria used in grouping the soils do not include major and generally expensive landforming that would change slope, depth, or other characteristics of the soils; nor do they include possible but unlikely major reclamation projects. In the soil capability system rating, soils are generally grouped at three levels, which are capability class, subclass, and unit. Capability classes, the broadest groups, are designated by the numbers 1 through 8. The numbers indicate progressively greater limitations and narrower choices for practical use.

- Class 1 soils have slight limitations that restrict their use.
- Class 2 soils have moderate limitations that restrict the choice of plants or that require moderate conservation practices.
- Class 3 soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.
- Class 4 soils have severe limitations that restrict the choice of plants or that require special very careful management, or both.

Based on this classification system, soils within the proposed Annexation Project area include irrigated capability Classes 2, 3, and 4, and non-irrigated capability Classes 3 and 4, indicating that portions of the site contain soils with moderate to very severe limitations for agricultural use.

Justification for Approval

The annexation area is planned for urban uses in the Orland General Plan. The annexation request includes an amendment to the City's 10-year planning horizon. Despite the impacts to agricultural land in Glenn County, the Project will promote planned, orderly, and efficient development. Lastly, the Project proposes an orderly and logical boundary for annexation and is contiguous to the City limits. Consistent with the requirement that LAFCo review the proposed annexation request pursuant to the criteria provided in California Government Code Section 56337, the following justification and findings are made in support of approval of the annexation request:

- 1) Lands within the annexation area are planned for urban uses in the Orland General Plan.
- 2) The annexation request includes an amendment to the City's 10-year planning horizon.
- 3) The Project proposes an orderly and logical boundary for annexation and is contiguous to the City limits.

The Project creates a logical extension of the City boundaries and can be served by existing infrastructure.

ANNEXATION PLAN



WEST ORLAND ANNEXATION




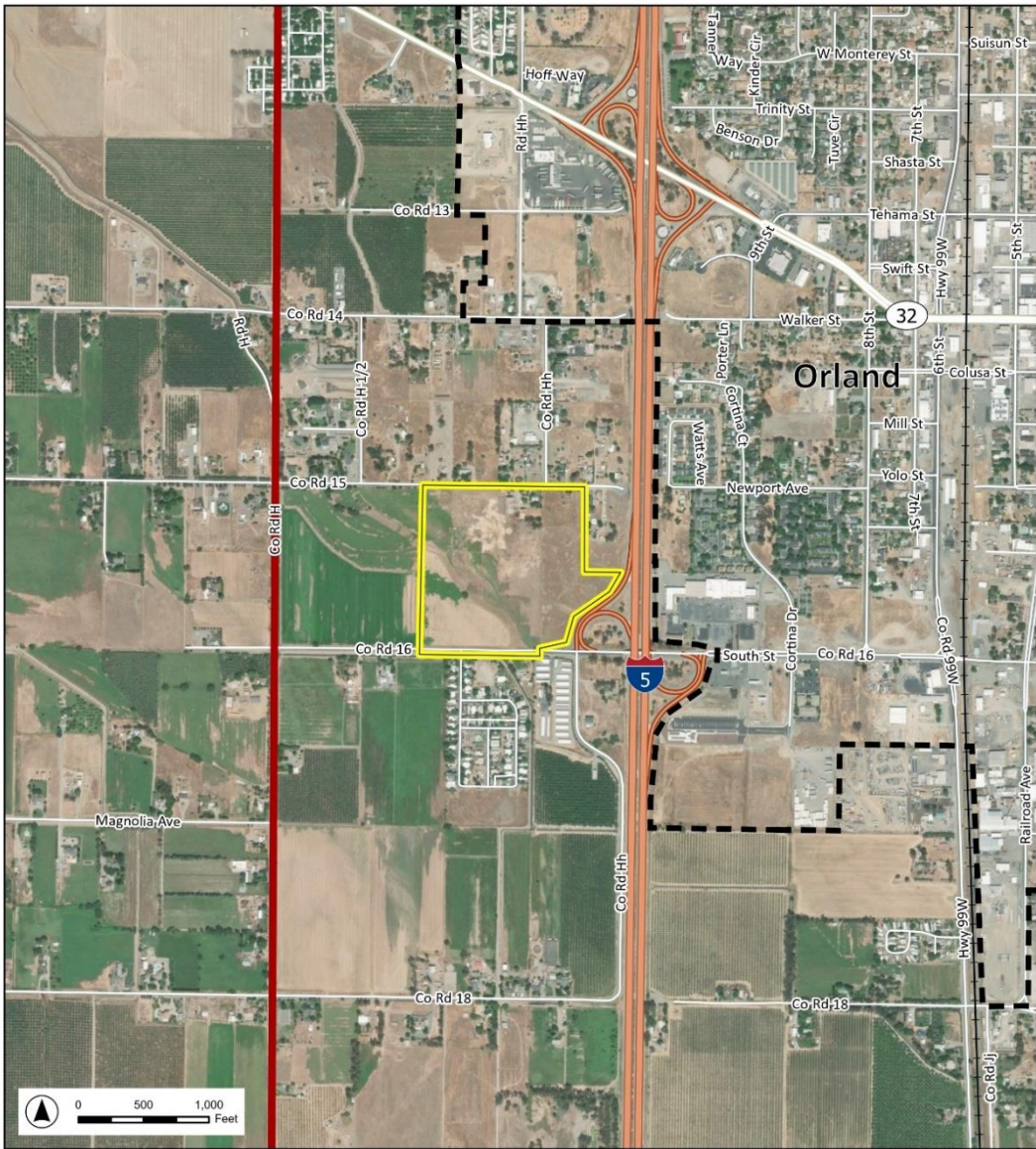
- Legend**
-  Project Location
 -  Incorporated Area
 -  County Boundary

Figure 1. Regional Map

Sources: California State Geoportal; USGS Transportation Dataset. Map Date: January 4, 2026



ANNEXATION PLAN



- Legend**
- West Orland Annexation Area
 - City of Orland
 - Orland Sphere of Influence

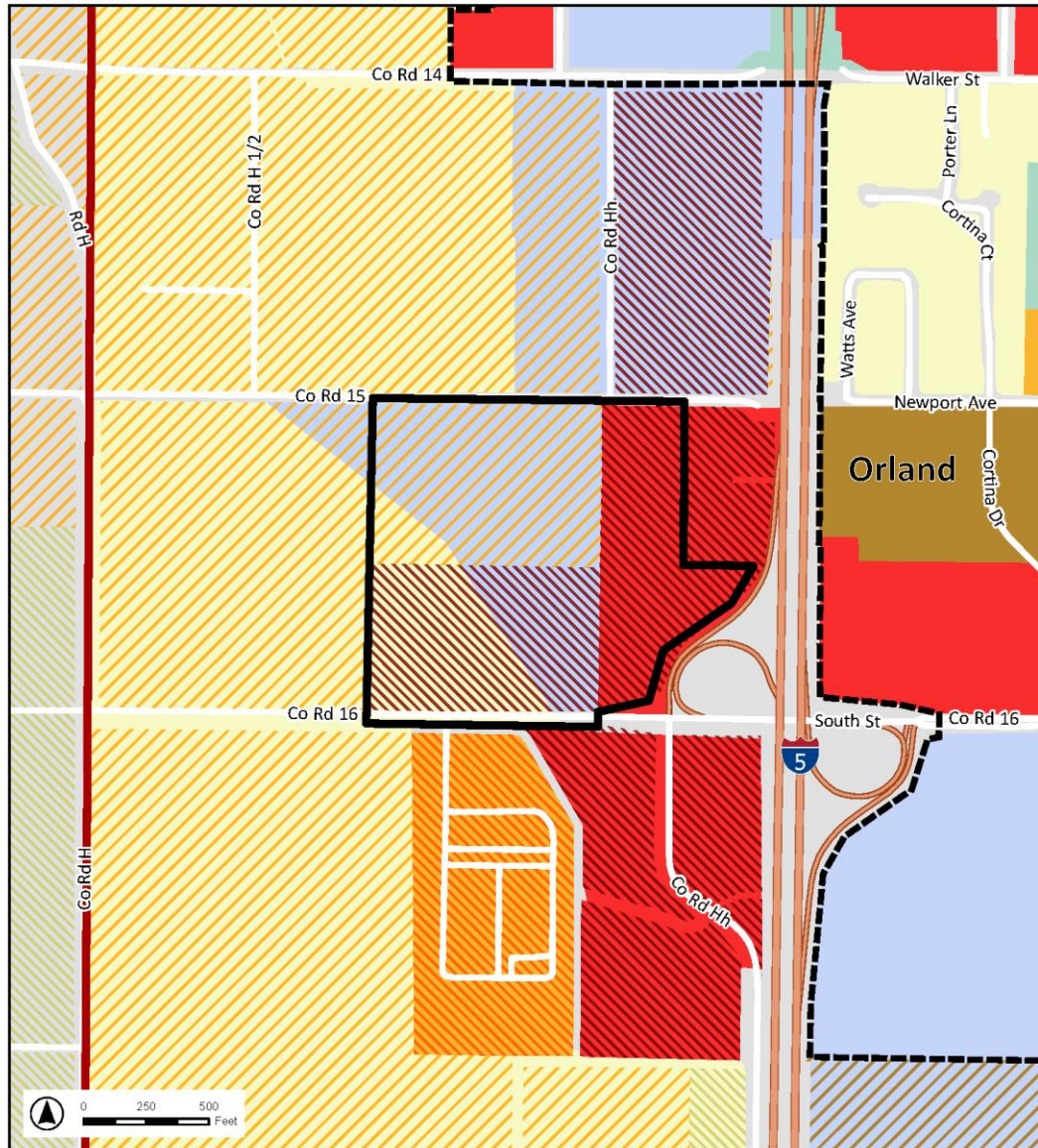
WEST ORLAND ANNEXATION

Figure 2. Vicinity Map

Sources: California State Geoportail, USGS Transportation Dataset; Fvivid Imagery 7/19/2023. Map Date: January 4, 2026.

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ANNEXATION PLAN

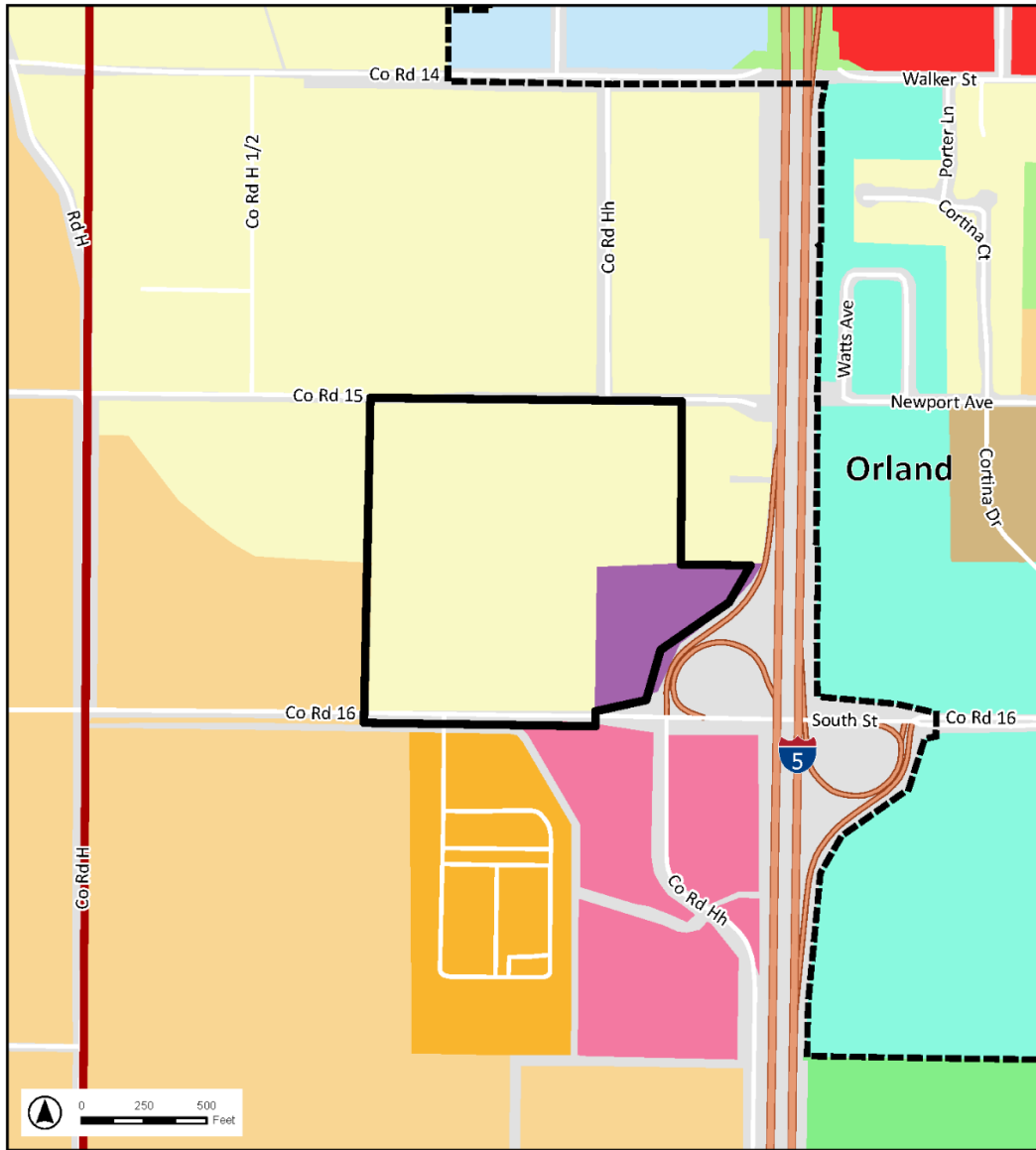


WEST ORLAND ANNEXATION

Figure 3. Existing General Plan

Sources: California State Geoportal; USGS Transportation Dataset; Glenn County General Plan; City of Orland General Plan. Map Date: January 4, 2026.

ANNEXATION PLAN



Legend		Glenn County Zoning	City of Orland Zoning
	West Orland Annexation Area		
	City of Orland		
	Orland Sphere of Influence		

WEST ORLAND ANNEXATION

Figure 4. Existing Zoning

Sources: California State Geoportal; USGS Transportation Dataset; Glenn County Zoning Map; City of Orland Zoning Map, Map Date: January 4, 2020.

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2. CITY SERVICES PLAN

Introduction

Pursuant to California Government Code Section 56653, the Glenn County LAFCo requires that any application for a change of organization or reorganization be accompanied by a plan for providing services. In accordance with Section 56653, the plan shall include:

- an enumeration and description of services to be extended to the affected territory;
- the level and range of those services;
- an indication of when those services can feasibly be extended to the affected territory;
- an indication of any improvements or upgrading of structures, roads, sewer or water facilities, or other conditions that the local agency would impose or require within the affected territory if the change of organization or reorganization is completed; and
- information with respect to how those services will be financed.

This Annexation Plan has been prepared to fulfill this requirement.

Discussion

As mentioned prior, approval of a site plan is not being requested by the applicant at this time, as all site plans and specific development proposals remain conceptual. No discretionary entitlements or development approvals are being requested as part of the Annexation Project beyond annexation of the project site into the City of Orland and rezoning, as described below.

For the purposes of this analysis, it is assumed that any future development application on the project site would develop the site with commercial uses consistent with the City of Orland General Plan land use designations and the intended rezoning of Highway Service Commercial (C-H).

The Highway Service Commercial (C-H) designation is intended to accommodate traveler-oriented and service commercial uses along major roadways and highway corridors. Typical uses within the C-H designation may include lodging, restaurants, fueling stations, convenience retail, and other service commercial uses designed to serve the traveling public and nearby community, subject to City development standards.

The Annexation Project would ultimately connect to existing or planned City of Orland infrastructure to provide water, wastewater, and storm drainage services to future development on the project site. While specific utility alignments and connection points have not yet been finalized due to the conceptual nature of future development, any future projects would be required to connect to and/or extend City utilities in accordance with City of Orland standards and policies, and subject to review and approval at the time of development.

ANNEXATION PLAN

Water

Potable water for the Annexation Project would be supplied from the City's municipal water system. The City of Orland's primary water system, Public Water System 1110001, consists of six wells distributed throughout the City. The sole source of water within the City is groundwater. The wells have an average depth of approximately 200 feet, and the average depth of groundwater is generally between 20 and 50 feet. Pressure for the City water system is provided by gravity flow from an 80,000-gallon elevated storage tank. The wells produce between approximately 500 and 1,200 gallons per minute each.

The water transmission and distribution systems consist of approximately 34 miles of pipeline ranging in diameter from 4 inches to 10 inches. To serve the new development associated with the project site, water lines would need to be installed or extended.

The Colusa Subbasin, which supplies potable water to the City of Orland, shows an average seasonal fluctuation of approximately 5 feet for normal and dry years. Despite seasonal variations, long-term groundwater levels of the Colusa Subbasin have remained relatively constant. As described in the Orland General Plan EIR, the estimated storage capacity to a depth of 200 feet is approximately 13,025,887 acre-feet and estimates of groundwater extraction for agricultural, municipal and industrial, and environmental wetland uses are 310,000; 14,000; and 22,000 acre-feet, respectively. The Department of Water Resources has not identified the Colusa Subbasin as overdrafted in its DWR Bulletin 118. Also, there has been no indication of any existing or anticipated overdraft condition in studies prepared by other entities.

Based on an occupancy factor of 2.50 persons per water service connection and a City population of 12,286 residents, Orland will have approximately 4,914 active water service connections by 2028. Orland General Plan policies ensure that adequate water supply would be available for the Annexation Project.

Policy 5.6.E encourages conservation of water, as well as minimizing costs associated with pumping and delivery systems. Policy 5.7.B promotes the efficient use of water within the City's Planning Area, which would be achieved by promoting the use of water-conserving devices for new construction and major renovations (Program 5.7.B.1). Program 5.7.B.2 requires new development to fund its fair share portion of its impacts to all water supply-related services and facilities.

Implementation of the proposed General Plan policies and programs listed above as well as the mitigation measures contained within the Orland General Plan EIR, would ensure that sufficient water capacity is available to support new development in conjunction with existing development. Therefore, the City's water treatment and conveyance infrastructure is adequate to serve existing demand, in addition to the demand created by the Annexation Project.

As mentioned prior, the Annexation Project would require extension of offsite water conveyance infrastructure to the Project site for potable water and irrigation water. All offsite water utility improvements will be in or adjacent to existing roadways along the perimeter of the Project site.

Stormwater

The City of Orland’s stormwater drainage system consists primarily of surface water conveyance utilizing curbs and gutters which lead to underground drainage pipes that eventually discharge into the Lely Aquatic Pond, the Stony Creek Basin Tributary Area, or on-site retention basin and leach field systems.

Drainage improvements will be constructed in order to maintain the service level standard. This is accomplished by constructing the storm drainage and flood protection facilities for each new area that is developed, and by ensuring that necessary facilities are developed efficiently prior to and during construction activities.

Development of the project site would place impervious surfaces on the majority of the project site. Development of the project site would potentially increase local runoff production and would introduce constituents into storm water that are typically associated with urban runoff. These constituents include heavy metals (such as lead, zinc, and copper) and petroleum hydrocarbons. BMPs will be applied to the proposed site development to limit the concentrations of these constituents in any site runoff that is discharged into downstream facilities to acceptable levels.

Permanent onsite storm drainage would be installed to serve the Annexation Project. The potential environmental impacts of construction of the onsite storm drainage system are addressed throughout this Initial Study, given that all improvements would occur onsite, within the area proposed for disturbance. As described above under the Hydrology and Water Quality Section, new development projects in the City of Orland are required to provide site-specific storm drainage solutions and improvements that are consistent with the overall storm drainage infrastructure approach as required by the City of Orland.

Wastewater

The City wastewater collection and treatment system comprises an extensive collection system and four sewage treatment ponds. Treated effluent from the treatment facility is discharged to a 50-acre parcel.

All sewage that is generated inside of the city limits is collected and treated by the Orland Wastewater Collection and Treatment Facility (WCTF). Areas immediately surrounding Haigh Field are also served by the WCTF. Other than Haigh Field, areas outside of the city limits are treated by private on-site septic systems. The treatment facility utilizes a primary treatment process consisting of a bar-screen located at the headworks building with screened effluent being disposed into a rotating series of four sewage disposal ponds located west of the airport. These four primary settling ponds, along with two specially lined and isolated brine ponds, are located on a 50-acre City-owned parcel of land.

The City has adequate capacity to serve the project’s projected demand for wastewater treatment services in addition to its existing commitments, and no improvements or expansions to the existing WCTF are required to serve the Annexation Project. The addition of project-generated wastewater would not result in any RWQCB violations related to effluent treatment or discharge.

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Solid Waste

Glenn County prepared the required Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE) in 1992. Glenn County leases and operates a landfill located at the west end of County Road 33 off Interstate 5 in Artois. Orland residents can contract individually with Waste Management for curbside waste and recycling collection services. Orland area waste is delivered to the Glenn County Landfill by Waste Management.

The Annexation Project would not generate significant volumes of solid waste, beyond levels normally found in commercial developments. Using CalRecycle's commercial use solid waste generation rate of 5 pounds per 1,000 sf per day, the project is expected to produce a maximum of approximately 8,058 pounds per day. The addition of the solid waste generated by the project would not exceed the capacity of the local landfills.

As described above, there is adequate landfill capacity to serve the Annexation Project, and the project will comply with all applicable statutes and regulations related to solid waste.

Electricity and Natural Gas

Pacific Gas and Electric Company (PG&E) is responsible for provision of electricity and natural gas to the City and the annexation area. PG&E delivers approximately 86,179 million kilowatt-hours (kWh) of electricity to its 15 million customers throughout the 70,000-square-mile service area in northern and central California.

PG&E is also responsible for the provision of natural gas to the City. Gas is delivered to the City and the City Planning Area through portions of PG&E's 48,198 miles of natural gas pipelines. Residents, owners, and/or tenants would be responsible for paying for electricity and natural gas services, based on the amount of energy used.

Police Services

The Orland Police Department is the local law enforcement agency serving the city of Orland, California, located at 817 4th Street, Orland, CA 95963. The department is dedicated to proactive policing, crime prevention, community safety, and emergency response, operating 24/7 with a team of 10 full-time sworn officers and 2 full-time civilians.

Impact fees from new developments are collected based upon projected impacts from each development by the City as COAs prior to project approval. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, and other revenues generated by the project, would fund capital and labor costs associated with police services.

It is not anticipated that implementation of the Annexation Project would result in significant new demand for police services. Project implementation would not require the construction of new police facilities to serve the project site, nor would it result in impacts to the existing response times and existing police protection service levels. Furthermore, the City's General Plan ensures the City maintains adequate police staffing, performance levels and facilities to serve Orland's existing population as well as any future growth.

Fire Services and Emergency Medical Services

The Orland Volunteer Fire Department was formed in 1911 after much of Orland’s downtown burned in a devastating fire. In July of 2019, the City in partnership with the Orland Rural Fire Protection District and OVFD, hired Orland’s first paid Fire Chief, Justin Chaney Chief Chaney has been the fire chief for the volunteers since 2017.

Recognizing the potential need for increases in fire protection and emergency medical services, the City’s General Plan includes policies to ensure that adequate related facilities are funded and provided to meet future growth. Implementation of the Annexation Project would not adversely impact existing fire and emergency services within the city and would not require the construction of new fire protection facilities. Impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant as COAs prior to project approval, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund capital and labor costs associated with fire protection services.

In order to provide adequate fire protection and suppression services to the project site, the Orland Volunteer Fire Department must have access to adequate onsite hydrants with adequate fire-flow pressure available to meet the needs of fire suppression units. The final site plans and development specifications developed for the Annexation Project will indicate the location and design specifications of the fire hydrants that will be required within the project site.

ISO RATING

The Insurance Services Office (ISO) Public Protection Classification Program currently rates the Orland Fire Protection District as a Class 1. ISO ratings are provided on a scale of 1 to 10, with 1 being the highest possible protection rating and 10 being the lowest. The ISO rating measures individual fire protection agencies against a Fire Suppression Rating Schedule, which includes such criteria as facilities and support for handling and dispatching fire alarms, first-alarm response and initial attack, and adequacy of local water supply for fire suppression purposes. The ISO ratings are used to establish fire insurance premiums.

School Services

Implementation of the Annexation Project would result in modest employment growth within the City of Orland, which may increase enrollment at schools within the Orland Unified School District incrementally. The Orland Unified School District collects impact fees from new developments under the provisions of SB 50. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from taxes, would fund capital and labor costs associated with school services. The adequacy of fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the project, would fund improvements associated with school services.

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Parks and Recreation

The Annexation Project would not increase demand for parks and recreational facilities within the City of Orland and would not increase the use of the City's existing parks and recreation system. The City of Orland requires the payment of the project's fair share in-lieu parks fees, as required by the City's General Plan. The collection of fees and determined fair share fee amounts are adopted by the City as COAs for all new development projects prior to project approval. Fees paid aid in the development of new park space and maintenance as required, to ensure continued high quality park facilities for all City residents.

Other Government Facilities

The Annexation Project would be subject to Chapter 15.42 of the City of Orland Municipal Code which establishes development impact fees requiring that new development provide a fair share contribution toward the provision of services. Payment of the fee is required to implement the goals and objectives of the General Plan and to mitigate the impacts caused by future development in the City. The payment of fees has been identified to finance public facilities and/or compensation measures, and to pay for each development's fair share of the construction costs of these improvements, and/or the costs of the compensation measures.

Findings

Overall, existing public services, with improvements proposed as a part of the Project, would be adequate to serve the Project. The Annexation Project would require the extension of services provided by the City, including public safety and utility services. The design, engineering, and construction of these services and infrastructure improvements will be financed by the developer subject to approval by the City of Orland.

3. TIMELY AVAILABILITY OF WATER SUPPLIES

The provision of public services and the construction of on-site and off-site water infrastructure would be required to serve future development associated with the proposed Annexation Project. Upon annexation into the City of Orland, potable water would be provided by the City's municipal water system through extension of the existing underground water distribution network in accordance with City standards and specifications. Off-site water improvements would generally occur within or adjacent to existing public rights-of-way along the perimeter of the project site, and on-site improvements would occur within the project area.

Water demands associated with future development of the site would be supplied by the City of Orland's existing groundwater-based water system. According to the City's Water System Master Plan, the City's water system is served by six groundwater wells that produce water for potable use, and the Plan identifies improvements and additions to well, storage, and distribution infrastructure to ensure reliable service to existing and future service areas. The City's long-range water planning anticipates water use demands resulting from growth and supports extension of water service into areas such as the project site following annexation.

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The City is also engaged in ongoing water system expansion and resiliency efforts, including the Orland Area Water Supply Project, which extends water mains, storage, and pumping capacity to serve customers beyond existing city limits and improve overall system reliability.⁴

Water demands for the Annexation Project would be served using the City’s existing and planned future water supply portfolio. Development proponents would provide their proportionate share of required funding for water system extensions and improvements necessary to serve development on the annexed site, consistent with City of Orland policy and applicable fee programs.

Water supplies are expected to be available to serve future development of the annexation area during normal, single-dry, and multiple-dry year conditions without the need for expansions of water entitlements beyond those planned and funded by the City. Any additional water supply projects or infrastructure improvements identified in the City’s water planning documents would be implemented through the City’s capital improvement planning process as dictated by the pace and timing of development in the annexation area. As identified above, the Annexation Project would not result in insufficient water supplies available to serve the Project from existing entitlements and resources.

Therefore, the City of Orland will have sufficient water supplies to meet the projected demands from development allowed by the General Plan, and has sufficient water supplies available to serve the Annexation Project from existing entitlements and resources, and would not require new or expanded entitlements during normal, dry, and multiple dry years. The Annexation Project is considered planned growth and to the extent that the Annexation Project would require additional water supply.

⁴ City of Orland. *Orland Area Water Supply Project Press Release*. Feb. 9, 2022, <https://www.cityoforland.com/wp-content/uploads/2022/02/Orland-Area-Water-Project-Press-Release.pdf>.

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